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From: lemassey@powersystems.rockwell.com  
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Sent: Tuesday, December 02, 2003 9:35 AM  
To: equivalencycomments@dol.gov  
Cc: jim\_cigler@nema.org  
Subject: Comments in Support of Equivalency

Rockwell Automation is a global manufacturer of products used in Hazardous Areas. Our electric motors, provided under the Reliance brand, or private branded for major mining equipment manufacturers are used world wide.

We acknowledge that the IEC standards, and the MSHA standards are different, but from a design perspective, products designed to comply with the IEC standards provide an equivalent level of protection against the risk of explosion as the MSHA products.

Therefore, we fully support equivalency of the IEC Standards to the existing MSHA requirements without modification, additions, or deviations.

Within the IEC community, there exists an international agreement between countries relative to the IECEx standards, called the IECEx Scheme. (<http://www.iecex.com/>) The United States is a participating country to this scheme.

The scheme includes formal accreditation policies for Ex Testing Laboratories (ExTL), so we also support incorporation of this ExTL concept into the MSHA rules, allowing for testing to be conducted by any ExTL.

Sincerely,

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