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**From:** L Winston [lacy@cwv.net]  
**Sent:** Sunday, February 05, 2006 11:34 AM  
**To:** zzMSHA-Standards - Comments to Fed Reg Group  
**Subject:** RIN 1219-AB44 Safety Equipment

I would hope that you would make it law that mine companies use the PEDS System of communications. I have a fair degree of understanding of this system based upon my research and work with National Mine Service Company here in Beckley, Wv from 1992-2001 and I am pretty confident this is the only system that has proven itself in the field and is reliable right now.

I highly recommend the use of Oxygen/Refuge Chambers. There should be at least 2 of these within 1000 feet of the work area or no farther away than 10 minutes from the section. It should accommodate all working miners in that section even if they have to put in two or three of them. They should be equipped with enough food, water, and medical supplies for a least 5 days. The communications to these chambers needs to be independent of the normal mine communications and Permissible in nature. Some sort of beacon needs to be installed (if not already installed with the unit) and miners able to see it in near zero visibility. It should have a system of generating it's own internal oxygen and a separate system for generating internal power (for communications and such). All this should be Permissible under the Law.

There should be no delay in implementing these as the devices are already available and in use at other mines in Australia and elsewhere in the world. The longer the delay the more of a chance that more miner will loose their lives in the meantime. The research has already been done for you by the manufacturer and no further research should be required. The only responsibility you have now is to move as quickly as possible to make these units mandatory.

Thank you,

Lacy Winston Jr.  
National Mine Service 1992-2001  
Class A Electronics Technician

P.S. You need to correct your comments link it is incorrect and bouncing e-mails

**MSHA Docket No.  
AB44-Comm-15**