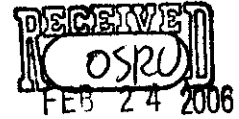


February 17, 2006



MSHA, Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2313
Arlington, Virginia 22209-3939

Re: RIN 1219-AB 44

As underground coal miners we are compelled to "...assist the agency in determining an appropriate course of action as necessary to improve mine rescue capabilities".

It is fairly common knowledge among experienced underground coal miners that leaving old works unsealed for extended periods of time literally constitutes an open invitation to disaster. We feel that MSHA's continued failure to establish strict industry-wide time limits for the sealing of old works increases the potential for mine disasters. Certainly the design and construction of "explosion-proof" seals needs to be more carefully reconsidered in light of recent events. In addition, the amount of air that is allowed to travel down belt lines needs to be restricted in some instances, since it has the potential to contribute to the rapid spread of belt fires.

While improving methods and equipment used in response to mine disasters is commendable, we feel the most significant improvements can be accomplished by taking measures to eliminate some of the existing practices and hazardous conditions that could conceivably contribute to, or may result in the use of and increased need for mine rescue equipment.

Sincerely,

A handwritten signature in cursive script that reads "Greg Mahan".

Greg Mahan
President of UMWA Local 1969
P.O. Box 672
Taylorville, Illinois 62568
Phone #217-824-2789

cc: David Yard

AB29-COMM-29