
From: Kathleen Vaughn [kvaughn@oxysure.com]
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To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: RIN 1219-AB44

OxySure Systems, Inc hereby respectfully submits comment related to new catalytic oxygen generation technologies and new rebreather technologies, specifically applied to and incorporated into a next generation self rescuer (SCSR) . We believe that the technology exists to deploy this next generation self rescuer device into the mining industry , as we have researched, developed, validated and tested this over a 4 year period. We believe that the next self rescue device should include:

- > INCREASED reliability and exceptional dynamic performance as compared with older self rescuer devices.
- > Oxygen supplementation. Rebreathers should be supplemented with medically pure oxygen in a closed circuit.
- > DEVICES should be cost effectively replenishable in order to provide miners with access to breathable air with limited or no interruption.
- > Safety. Oxygen supplementation should be provided safely, and should be generated on demand. Therefore, no compressed storage should be involved. This can be achieved by catalytic means, such that the oxygen generation reaction does not create excessive heat or pressure.
- > NO need to transfer. Because of the high stress and dangerous conditions that miners are expected to don, transfer of SCSRs can be problematic and possibly fatal. We believe that a next generation SCSR should provide continuous breathable air without the need to don multiple SCSRs.
- > Training - Retention of training by miners is key in successful donning, egress and transfer of SCSRs, therefore a new SCSR should economically allow hands-on training where actual units are deployed in a training scenario.
- > IMPROVED Carbon Dioxide Removal - we believe and submit that new SCSRs should overcome the current technology's shortcomings of high heat generation, inconsistent rate of CO2 absorption and unreliable duration.

Respectfully submitted,

Julian T. Ross
Chairman & CEO
OxySure Systems, Inc.
214-618-7918
jross@oxysure.com