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**From:** Bill K. Caylor [bcaylor@kentuckycoal.com]  
**Sent:** Friday, November 16, 2007 3:24 PM  
**To:** zzMSHA-Standards - Comments to Fed Reg Group; Silvey, Patricia - MSHA  
**Subject:** comments on proposed rules on mine rescue teams and equipment -- RIN 1219-AB53  
November 16, 2007

MSHA  
Office of Standards, Regulations, and Variances  
1100 Wilson Boulevard, Room 2350  
Arlington, Virginia 22209-3939

RE: Comments on proposed rules on mine rescue teams and equipment  
RIN 1219-AB53

Dear Sir/Madam:

The Kentucky Coal Association would like to take this opportunity to comment on the proposed rule on mine rescue teams and equipment. The Kentucky Coal Association represents large and small, surface and underground coal operators in both the eastern and western Kentucky coal fields. Our members mine a major portion of Kentucky's coal.

The Kentucky coal industry strongly feels that the Kentucky's state mine rescue teams should qualify as certified mine rescue teams. The Kentucky state teams meet the one-hour travel requirement and are superior teams. These state teams are the backbone of mine rescue in Kentucky. The final rule should recognize these teams and allow the state team to substitute for 100% of the training required under this proposal. The state teams should be allowed to be substituted for individual mine rescue teams under this proposal. The state inspectors who serve on the state teams are familiar with the mines and are dedicated to mine rescue. Failure to recognize state teams may lead to the elimination of state teams which would severely and adversely affect coal mine safety in Kentucky. The intent of the MINER Act was to promote the most effective mine rescue teams, not penalize Kentucky's state teams.

Sincerely,

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