



February 20, 2003

Marvin W. Nichols, Jr.  
Mine Safety and Health Administration  
Office of Standards, Regulation, and Variances  
1100 Wilson Blvd., Room 2313  
Arlington, Virginia 22209-3939

RE: Comments Alternate Locking Devices for Plug and Receptacle-Type Connectors on  
Mobile Battery-Powered Machines  
Deer Creek Mine 42-00121

Dear Mr. Nichols:

We have reviewed the proposed changes for the “direct final rule” concerning revisions to 30 CFR 18.41(f). We would make the following written comments:

1. **Additional Language:** This change in the regulation would cover advances in the industry to address this subject. We feel there may be additional improvements besides those listed by MSHA. We would propose an additional item which could allow for future advancements in lieu of using an interlocking device. Proposed wording could be:

(4) Other means accepted or approved by MSHA.

This would allow for future advancements with out having to go through another change in the regulations. MSHA would have control over the approval of these devices.

2. **Special Tool:** Item (2) would require the use of a special tool to separate the connector. We can see where the device should be captive but why a special tool? Any type tool could be used to secure the device such as an allen wrench. Is this a special tool or is it to common a tool to meet the requirement of the proposed regulation? The wording “special tool” will only cause interpretation problems. We would suggest removing the word “special” and just use the word “tool or device”.

AA98(PHASE10)COMM-3

We appreciate the opportunity to make comments on this proposed standard. Should you have any questions regarding our comments please feel free to contact me at (435) 687-6642.

Sincerely,

Kevin Tuttle  
Manager of Health,  
Safety and Training

Cc: Randy Tatton, Gary Christensen