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**From:** Jake Drenth [mailto:jd@drenthbrothers.com]  
**Sent:** Thursday, September 25, 2008 4:47 PM  
**To:** zzMSHA-Standards - Comments to Fed Reg Group  
**Subject:** RIN 1219-AB41

We are a small sand and gravel company that has a zero-tolerance drug policy and also are compliant with the DOT requirements for random testing and reasonable suspicion training and observation. The proposed MSHA laws are very close to what we are already doing. It would be good if we didn't have to re-invent the wheel with the new MSHA law and could easily incorporate them into our existing policies, as currently all of our miners have CDLs and are under DOT requirements.

The compliance burden on small businesses such as ours seems to be growing at an exponential rate. Any time that I have to do paperwork is time away from producing product and generating income. Keep the new laws simple, easy to incorporate into existing policies, and relatively low on the maintenance level.

Thanks,

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