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Department of Interior
Minerals Management Service
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Herndon, VA 20170-4817

To Whom It May Concern:

I am writing in response to the Notice of Proposed Rulemaking on Incident Reporting Requirements which appeared in the Federal Register on 8 July 2003.

I applaud the Minerals Management Service for this proposed rule. It is long past the time when all workplaces in the United States were covered by a single, consistent, set of requirements for reporting workplace injuries and illnesses. The proposed rule is a step in the right direction. However, it falls short.

MMS should simply require all employers on the Outer Continental Shelf to report occupational injuries and illnesses in accordance with criteria identical to those of the Occupational Safety and Health Administration.

MMS's placement of the reporting responsibility with leaseholders or designated operators serves to shield individual employers from their responsibility for their employees.

You ask "what kind of information should MMS collect about contractor performance on the OCS" indicating that more information "might provide insight to operators, contractors and MMS about ways to decrease injuries." Why have you not recognized the need for individual employees and employee organizations to obtain information about individual employers? Is it because MMS doesn't wish to upset the big oil companies? As noted above, I believe that MMS should establish a reporting system that requires each employer to report on injuries and illnesses involving their employees in a reporting system essentially identical to that administered by OSHA.

Obviously, for such a system to work effectively, the employers would need to also report on hours worked by their employees.

Since many OCS employees eat and sleep offshore, the MMS reporting requirements should apply to all the time that the employees are offshore, not just working hours; however, the system should be able to distinguish between injuries occurring during working hours and those during time off. And, since the employer typically provides the living accommodations and food, the reporting of illnesses should be included.

Sincerely,

Byron Matthews