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PO Box 58
Harvel, Illinois 62538
June 19, 2011

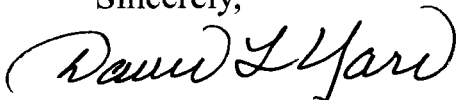
MSHA
Office of Standards, Regulations, and Variances
1100 Wilson Blvd., Room 2350
Arlington, Virginia 22209-3939

Re: MSHA RIN1219-AB75
*Examination of Work Areas in Underground Coal Mines for Violations of
Mandatory Health and Safety Standards*

To Whom it may concern,

If certified mine examiners are going to be required to conduct more complete and thorough examinations, MSHA should consider setting limits on the length of the route to be examined instead of allowing mine management to do so. While it may be the intention of MSHA to create a proactive program, I can envision instances where any such program could conceivably fall far short of the stated intent depending on the degree of accountability to which mine examiners may be held by mine management (and/or MSHA), particularly if they happen to be saddled with a route that is excessive in length to the point of being burdensome. The length of examiners' routes is certainly a variable that needs to have reasonably set limits established as a prerequisite to the creation of additional responsibilities for mine examiners.

Sincerely,



David L. Yard
Vice-president
UMWA L.U. 1969

cc: Dennis O'Dell

AB 75-COMM-24