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Sent: Sunday, February 06, 2011 9:49 PM

To: zzMSHA-Standards - Comments to Fed Reg Group

Subject: MSHA Proposed POV Rule

2011 FEB -7 A 10:27

I would like to comment, as we are subject to US DOT as well as US MSHA requirements. The DOT has a rigid schedule of what generates the requirements to schedule an audit. They have a pattern of what to check. I presently work for a very safety orientated company...but several years ago I worked for a outfit that used DOT's rigid scheduling to their advantage and often to unsafe shortcuts. I have worked, for the past several years, for a trucking company that works at Mine Sites and had an well above average safety record. In our company.....a employee never knows when one of our safety people will show up at the job site. They never know management will be double checking from week to week and it makes a real difference in how our crews work and how individuals work when away from the main office. I strongly recommend that you allow the inspectors to walk in any time and check anything, if you want the MSHA safety record to continue to reduce injuries and fatalities. I also suggest that you have every outfit with a MSHA number to have an administrative paperwork review at least every other year....and as I said before.....a lot of walk in visits in the field at the actual working site/area.

AB73-COMM-3