

## PUBLIC SUBMISSION

As of: 3/13/15 1:22 PM
Received: March 12, 2015
Status: Posted
Posted: March 13, 2015 <b>MAR 13 2015</b>
Tracking No. 1jz-8hog-7165
Comments Due: March 12, 2015
Submission Type: Web

**Docket:** MSHA-2014-0009

Criteria and Procedures for Assessment of Civil Penalties, 30 CFR Part 100

**Comment On:** MSHA-2014-0009-0082

Criteria and Procedures for Assessment of Civil Penalties

**Document:** MSHA-2014-0009-0095

Comment from Scott Higdon, NA

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### General Comment

I oppose everything contained in this rule, my opposition has already been stated by almost every commentator that has already written. All of the proposed changes only benefit MSHA and are detrimental to the operator. The pay 20% and not contest is so transparent it is laughable. Mitigating factors will no longer be used as a defense. This proposed rule is just another way to stack the deck in MSHA's favor and reduce what few rights and options the operator's have left to defend themselves.

AB72-COMM-49