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30 CFR Part 5 Fees for Testing, Evaluation, and Approval of Mining Products

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Fees for Testing, Evaluation and Approval of Mining Products

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Comment from Anonymous Anonymous, NA

Submitter Information

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Organization: NA

General Comment

How does this make mining safer?

Change from \$97 to \$121 Charging more when:

- 1) The industry consensus is we are currently being overcharged for every approval.
- 2) The industry consensus is we are not getting what we pay for now. Approval times are ridiculously long. What use to take 3-4 weeks, now takes 9-12 months or longer.
- 3) This includes paying full price for minor changes on every approval. Every update or change is treated like a new approval and costs the same as a new approval. Discrepancies on updating are rarely anything new on the approvals.
- 4) It is often very obvious when the MSHA inspector is not at all familiar with the equipment under review. We are in essence, paying to train the MSHA inspectors.
- 5) Is MSHA trying to be a more profitable government agency?

Charging for internal quality control activities:

- 1) Unethical, MSHA could charge for unknown and exaggerated paperwork evaluation(s). Who will watch over MSHA to verify there is no favoritism, retaliation, or harassment?
- 2) I cannot charge my venders separately for this; they could not include it in their prices. This is usually considered overhead.

Charging approval holders for post approval audits

- 1) Unethical, MSHA could charge for unknown and exaggerated paperwork evaluation(s).
- 2) I cannot charge my venders for this; they could not include it in their prices.

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3) Try charging any government agency these costs.

4) MSHA could audit the same company as often as they want. The industry consensus is that MSHA has let politics get into the approval /audit process. This could put anyone MSHA personnel do not like out of business.