

# PUBLIC SUBMISSION

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**Docket:** MSHA-2014-0016

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

**Comment On:** MSHA-2014-0016-0002

Fees for Testing, Evaluation and Approval of Mining Products

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Comment from anonymous anonymous, NA

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## Submitter Information

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## General Comment

To me it seems that these fees are just being added on only for financial reason, and not reasons to help improve the environment and the conditions for coal miners.

So much money is being calculated into these "fees" that are just used as testing not inspection of these mines. Until its justified that \$2,499 is need just for testing purposes I see no need for feels to be calculated that high. This extra money that is being used to tack on fees could be going to use to something far more useful, just as improvements for the conditions of these miners. or even the State Mine Inspector.

A "fee for approval program services" to me sounds like a fee that is just being added on to these bills as a way to get more taxpayer dollars. That nothing substantial and beneficial comes from these certain fee.

It states that "under the proposed rule, MSHA would continue to determine an hourly rate to cover direct and indirect costs" what are these indirect costs and what is justified as an indirect cost? It also states that theres is a scheduling fee? My taxpayer dollars should be spent on something that protects the workers safety and health no for a "scheduling fee". billing a mine up to \$2,499 for these tests should be spent on the structural integrity of these mind not aimless testing.

"Approximately \$100,000 in increased fees is primarily attributable to foreign entities" ...

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\$100,000 is a large increase in fees, is there no way to cut these in order to save money on "testing, and scheduling" so that this amount of money can be put use to productions costs and then would decrease the consumer costs?