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WHERE SAFETY IS SUCCESS.™

December 15, 2015

Ms. Shelia McConnell  
Acting Director  
Office of Standards, Variances and Regulations  
Mining Safety and Health Administration  
201 12th Street South, Suite 4E401  
Arlington, VA 22209

Re: Strata Worldwide Comments on Proposed Rule, "Proximity Detection Systems for Mobile Machines in Underground Mines," RIN 1219-AB78; 80 Fed. Reg. 53,070 (Sept. 2, 2015)

Dear Ms. McConnell:

Strata Worldwide ("Strata") submits these comments in response to the Mine Safety and Health Administration ("MSHA") proposed rule, "Proximity Detection Systems for Mobile Machines in Underground Mines," (80 Fed. Reg. 53,070). We greatly appreciate having the opportunity to comment on this important rulemaking.

Strata Worldwide has been a manufacturer of Proximity Detection Systems since 2010 when it acquired the technology and underlying intellectual property from Frederick Mining Controls, LLC ("FMC"). FMC began proximity trials as early as 2005. Strata Worldwide owns 11 U.S. patents and 16 corresponding foreign patents, primarily in Australia and South Africa, and continues to develop enhancements to the proximity technology.

#### Technology is Proven

Globally, Strata Worldwide has shipped over 900 proximity detection systems for use in underground coal mining environments and more than 300 proximity systems for use in surface/hard rock environments. Each system covers one piece of equipment. We believe about 85%, or somewhere around 1000 systems, are actively running today.

South Africa has led the way with the use of proximity detection as our systems have been installed on more than 20 different types of equipment in coal environments. The types of machinery include, but are not limited to, continuous miners, shuttle cars, battery haulers, scoops, LHDs, feeder breakers, tractors, graders, mules, and various types of diesel equipment. Well over 6000 miner Personal Alarm Devices ("PADs") are currently in the mines and operating daily.

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With regard to the United States, Strata has had proximity detection systems running on mobile equipment, as well as continuous miners, since 2009. Several mines in the US have adopted the strategy of installing proximity detection on all equipment, including: continuous miners, shuttle cars, scoops, feeder breakers, loaders and other equipment. Strata has also outfitted a continuous haulage system with proximity detection systems in a hard rock environment in Canada. We have active customers that have been successfully running proximity on both continuous miners and mobile equipment for over three years in the US.

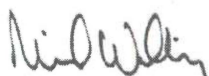
Strata Worldwide has installed proximity detection systems on nearly 150 pieces of diesel machinery. The large majority of the diesel installations have taken place in South Africa. In both South Africa and the United States, there are instances where the proximity system interfaces with the piece of diesel machinery and can assist in slowing and stopping the piece of equipment. In South Africa, it is required that diesel equipment in coal mining environments stop before contacting a miner; much like the proposed rule in the U.S.

#### Installation Options

To date, Strata has installed complete proximity systems at OEM facilities including, Joy Machinery, CAT, Sandvik, Phillips and others. Strata has also installed a large number of systems in various rebuild shops around the world as well as machine shops that are owned by the mines themselves. Because of the tough economic conditions, we have seen fewer customers sending machinery to rebuild shops, which has allowed us the opportunity to install many of the active proximity systems in an underground environment. Of the 200+ systems running in underground environment in the United States today, around 65%, have been installed on equipment underground. Installation time in an underground environment depends on the type of machinery and the condition of the equipment. Installation times range anywhere from 3 shifts up to 8 shifts (8 hour shifts). Underground installations include: continuous miners, shuttle cars, scoops, feeder breakers, loaders, roof bolters and coal haulers. In the hard rock environment, systems have been installed on various types of mobile equipment as well as continuous haulage systems underground.

In summary, Strata appreciates the opportunity to comment on the proposed ruling for proximity detection systems on mobile equipment. Strata's goal is to work closely with all governing bodies, as well as mine operators, in order to make mining conditions safer for all people(s) involved. Regardless of the outcome of the ruling, Strata will continue to advance technologies in the mining industry in order to promote safety in all areas of the industry.

Sincerely,



Mike Walling  
Product Manager - Proximity  
Strata Products Worldwide, LLC