From: Joseph Riney <joseph@nevadamining.org>
Sent: Tuesday, December 15, 2015 9:44 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: RIN1219-AB78, Docket No. MSHA-2014-0019
Attachments: PDS - Comments.pdf

Attached you will find comments on behalf of the Nevada Mining Association in response to the proposed rule on Proximity Detection Systems for Mobile Machines in Underground Mines, RIN 1219-AB78.

NEVADA Mining Association

Joseph Riney
Director of Workforce Engagement

201 W. Liberty Street, Suite 300 | Reno, Nevada 89501
775.829.2121 | vCard | website | email

Champion of Nevada's 21st-century mining industry

NEVADA
Mining Association

201 West Liberty Street
Suite 300
Reno, NV 89501
(775) 829-2121 TEL
(775) 852-2631 FAX
www.nevadamining.org

December 15, 2015

Mine Safety & Health Administration
Office of Standards, Regulations, and Variances
1100 Wilson Boulevard
Arlington, VA 22209

RE: Proximity Detection Systems for Mobile Machines in Underground Mines
RIN 1219-AB78

To Whom It May Concern:

The Nevada Mining Association (NvMA) offers the following comments to the Mine Safety and Health Administration (MSHA) concerning its proposed rule "Proximity Detection Systems for Mobile Machines in Underground Mines" 80 Fed. Reg. 53070 (September 2, 2015). Our comments specifically address the proposal for the application of Proximity Detection Systems in metal/non-metal underground mines.

The Nevada Mining Association (NvMA) represents more than 430 firms and individuals who have a vested interest in mining exploration, operation, and vendor services. The Association works to ensure that the Nevada Mining Industry has a significant and consistent voice on policy issues relating to mining in Nevada and appreciates the opportunity to provide the following comments on this issue. NvMA supports, facilitates, and values the cooperative relationship that has been established between member companies and MSHA. We work diligently to ensure that all miners return home to their families safe and sound every day. Members strive to be proactive in their assessment of safety and health risks and attempt to go beyond what is required by the regulations.

The concept of advanced detection systems and the added safety that can be gained from such systems is very positive. However, at this time the technology has not been proven to work consistently and reliably in the metal/non-metal underground environment. Some of the issues that our members have experienced while testing Proximity Detection Systems are nuisance alarms that lead to alarm fatigue in operators, which may increase the chance of a hesitation when a valid alarm is triggered. Reliability and maintenance have also been problematic.

While some system manufacturers have stated that the systems are ready, they have not been tested in the metal/non-metal environment. It would be prudent that the technology be given thorough and proper testing before any rulemaking is proposed for the metal/non-metal mining industry.

Further, the nature of the mining process in metal/non-metal underground mines differs from that of coal mines whereby the frequency of miners working outside of equipment or alongside remote equipment is much less than in coal mines.

In conclusion, NvMA suggests that the Proximity Detection Systems be allowed to mature for use in metal/non-metal underground mines before a new rule is proposed.

Thank you for giving us the opportunity to submit comments on Proximity Detection Systems application in metal/non-metal mining.

Sincerely,
Joseph Riney
Director of Workforce Engagement