**Subject:** Comments for MSHA and RIN 1219-AB78 or Docket No. MSHA-2014-0019

**From:** David Clardy [mailto:David.Clardy@matrixteam.com]
**Sent:** Wednesday, December 16, 2015 12:20 AM
**To:** zzMSHA-Standards - Comments to Fed Reg Group
**Subject:** Comments for MSHA and RIN 1219-AB78 or Docket No. MSHA-2014-0019



To Whom It May Concern,

Please see the attached comments concerning the Proposed Rule, "Proximity Detection Systems for Mobile Machines in Underground Mines", RIN 1219-AB78.

Kind Regards,

David Clardy
Matrix Design Group

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AB78-LATE-COMM-1
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Matrix Design Group

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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: Matrix Design Group Comments on MSHA's Proposed Rule, "Proximity Detection Systems for Underground Mobile Machines in Underground Mines: RIN 1219-AB78; 80 Fed. Reg. 53,070

Dear Ms. McConnell:

These comments are submitted by of Matrix Design Group, an MSHA-approved proximity system manufacturer, in response to the Mine Safety and Health Administration (MSHA) proposed rule, "Proximity Detection Systems for Continuous Mining Machines in Underground Coal Mines," (80 Fed. Reg. 53,070). Matrix appreciates the opportunity to comment on this rulemaking.

Comments:

I. To enhance proximity system reliability and availability, Matrix strongly recommends that proximity systems be installed either during initial machine assembly or at a rebuild facility during the machine remanufacturing process. Proper placement, installation, and protection of cables and componentry are crucial to successful proximity system operation.

II. Vehicle control systems to handle outputs from a proximity system do not exist for many haulage vehicles or scoops, especially diesel-powered equipment. Braking systems must be tested to

ensure that continued use of additional braking in daily use does not affect braking system effectiveness or durability. Additionally, the automated braking system effort requested by the proximity system must be consistent to facilitate dependable stopping distances. Also, machine control systems for any vehicle utilizing a manual clutch are not developed at the present time.