
From: Bill Aufderheide <BillA@mrpaving.com>
Sent: Tuesday, April 25, 2017 4:37 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: workplace exam rule RIN 1219-AB87

I am writing to urge MSHA to delay or cancel the new workplace exam rule **RIN 1219-AB87**. We do not see the true benefit of these additional regulations. I am not convinced it will make anyone safer than the current rules. All I see is an additional tool for inspectors to fine us, and our employees, thereby enriching their budgets. The rule seems vague/ambiguous in some areas. This confusion will cause more opportunities for fines.

We put much effort in making our mines safe for our people. Additional regulations and financial threats only divert attention from the true dangers with concerns for making a paper trail. Once employees know they may be personally financially responsible for this paperwork, it will be difficult to find workers willing to sign off on them. What does the industry do when we already having problems finding quality workers?

Please delay this indefinitely until it's status is finalized. Or better yet, throw it out.

Sincerely

Bill Aufderheide
HR/Safety Manager
M.R. Paving & Excavating
507-354-4171