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**From:** Matt Bunner <MatthewBunner@mulzer.com>  
**Sent:** Friday, April 07, 2017 2:30 PM  
**To:** zzMSHA-Standards - Comments to Fed Reg Group  
**Subject:** RIN 1219-AB87

APR 07 2017

Workplace Exam Rule ( A non-safety rule)

This new rule needs to be stopped. It serves zero value and the documentation used to propose it is not scientific or valid. The accidents referenced in the Federal Registry would have been prevented if the mine operators had enforced the current regulations.

This new law serves nothing but granting intrusion into mining businesses procedures and business practices. It also allows MSHA the ability to write more paper based on task training of examiners, hazards being willful do to them should have been found prior to shift starting ,and the mine operator documenting hazards found as proof under the mine act as a hazard existing or could have existed.

The regulation does not cover multi-shift mines, hazards that occur after the mine start-up occurs (vibration, speed, and humans arriving to their work zones.) Look at the past numbers fatalities are down without this regulation, and this incurs people changing their current inspection of workplace culture.

It will also increase cost at several levels.

This regulation should be permanently suspended due to lack of proof and invalid science. MSHA told the industry that they cannot quantify whether this regulation will improve anything.

MSHA's personnel could not answer, "What if this does not work or increases accidents or fatalities?"

Sincerely,

M Bunner

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