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Exposure of Underground Miners to Diesel Exhaust

Comment On: MSHA-2014-0031-0076
Exposure of Underground Miners to Diesel Exhaust: Request for Information; Reopening of Rulemaking Record; Extension of Comment Period

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Comment from h h, NA

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General Comment

TAX REFORM STOP THE REGULATIONS AND COST OF REGULATION ENFORCEMENT, SAVE BILLIONS ...Regulatory dark matter, Federal Register is probably the most frequently cited measure of regulation's scope, which unintentionally highlights the abysmal condition of regulatory oversight and measurement. At the end of 2014, the page count stood at 78,978, the fifth-highest level in the Register's history . Both 2010 (81,405 pages) and 2011 (81,247 pages) were all-time record years. The 79,435 count in 2008 under George W. Bush holds the third-highest title. In keeping with the modern "pen-and-phone" ethos, of six all-time-high Federal Register page counts, five have occurred during the Obama administration. stressed accountability, noting that much law comes from agencies rather than elected lawmakers: while agencies issued 3,541 rules in 2014, Congress passed 129 laws that were signed by the president. it took 9.453 billion hours in 2013 to complete the paperwork requirements from 22 executive departments and six independent agencies. Looked at that way, 9.5 billion hours of paperwork iequivalent of 13,488 full human lifetimes, not other directives, mandates, or restrictions involved in actually carrying out regulation. Compliance officers driven by complicated new laws, regulations, and fines. per-employee regulatory costs for firms of fewer than 50 workers can be 29% greater than those for larger firms. cost estimates of the regulatory enterprise range from few billion the Office of Management and Budget bothers to proclaim (recall from part 5 that OMB has presented costs for 157 rules since 2000), through the \$2.028 trillion annually the National Association of Manufacturers (NAM) estimated in 2014 (Crain and Crain, 2014: 1), into the stratosphere according to an academic estimate of

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dozens of trillions in LOST GDP annually. 1994 regulatory costs at \$647 billion in 1995 dollars (US GAO, 1995), which around \$990 billion in 2013 dollars even assuming no new regulation in 20 years. (SBA), with various levels of critique and venom, have noted annual costs in the hundreds of billions, some well in excess of \$1 trillion converted into today's dollars. NAM's 2012 total annual regulatory costs in the economy of \$2.028 trillion. Each element of regulatory costs demands a dissertation for those affected but the largest components portrayed are legacy economic regulation, environmental regulation, and paperwork burdens. In the modern United States after Dodd-Frank and the Affordable Care Act the health services and financial components can be expected to expand. In any event, \$1.88 trillion omits much: most regulations' costs are never tabulated and some entire classes of government interventions such as antitrust, government manipulation of money, credit, and interest rates, and restricted access to resources are ignored by officialdom. In both the 112th and 113th Congresses, the House passed the REINS Act (Regulations from the Executive in Need of Scrutiny, H.E. 367) to require an expedited congressional vote on all major or significant rules before they are effective. Congress needs to broaden the REINS objection to any controversial rule, whether or not tied to a cost estimate that deems it a major rule. Furthermore, in the era of regulatory dark matter, the requirement for congressional approval should extend further to guidance documents and other agency decrees. Congress should also explore allocating regulatory cost authority among agencies in a "regulatory budget", while distinguishing between categories like economic, health/safety, and environmental regulations. A "budget" would create incentives promoting other supervisory mechanisms like central review, cost analysis, and sunsets, and inspire agencies to "compete" with one another in terms of lives they save or some other regulatory benefit rather than think within their own box. There were 72 laws passed by Congress and signed by the president in 2013 (US GPO, 1995-2014); agencies, implementing laws passed earlier issued 3,659 RULES AND REGULATIONS, 51 rules for every law. Legislatures rarely control spending, unaccountable bureaucracies, economic, environmental, and social interventions escalate. On occasions regulatory liberalization and is able to mobilize for reform, the inspiration is often smaller business burdens and job concerns. Regulatory Flexibility Act has directed federal agencies to assess their rules' effects on small businesses and describe regulatory actions under development. The 1996 Congressional Review Act (CRA) requires agencies to submit reports to Congress. Unfunded Mandates Reform Act of 1995 (P.L. 104-4) AND regulatory process is the post-New-Deal Administrative Procedure Act (APA) of 1946 (P.L. 79-404),