

# PUBLIC SUBMISSION

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**Docket:** MSHA-2018-0016

Safety Improvement Technologies for Mobile Equipment at Surface Mines, and for Belt Conveyors at Surface and Underground Mines.

**Comment On:** MSHA-2018-0016-0111

Safety Program: Surface Mobile Equipment

**Document:** MSHA-2018-0016-0135

Comment from Oaks, Emily

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## General Comment

My only comment is, why do we need a new set of Standards to cover items already covered by existing regulations? Task training, pre-use exams, not using beyond manufacturers recommendations, etcetera - we have the Standards, so why make something new?

Is it because of how the definitions are written?

Is it because the new Standard is written to cover everything from a skateboard to a drag conveyor?

Is it because MSHA is wanting to place a catch-all set of Standards out there to generate revenue?

Honestly, why write a new set of Standards when existing ones are in place?