

# 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-2018-0016-0142

Comment from American Society of Safety Professionals, [ASSP]

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## Submitter Information

**Email:** TFisher@ASSP.Org

**Organization:** American Society of Safety Professionals, [ASSP]

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## General Comment

Please see the attached revised comment from the American Society of Safety Professionals. There is the one revised comment file and then three additional files with supporting materials. This revised comment file is to replace the original comment submitted in October.

It is important to note that the intent of the Society with this revised statement is to note we do not have an overall position on the proposed rule regarding surface mobile equipment. This submission is intended to offer technical materials and background materials addressing safety management systems since several of our standards are cited and recognized by MSHA in the proposed rule.

Any questions or requests for additional information should come to my attention.

Thanks and Regards, Tim Fisher at ASSP

ASSP Contact Information

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## **Attachments**

ROI Paper 2020

Position Statement on Consensus Standards reaffirmed

OSHMS DOL Study of Sept 2021

MSHA Comment of Nov 2021