PUBLIC SUBMISSION

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

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Safety Program: Surface Mobile Equipment

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Comment from Hartness, Thomas

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General Comment

What is amazing to me is that after all these years since the MSH Act of 1977, and all the thousands of people who have perished from mobile equipment accidents over that time, is that MSHA still has no idea about how to affect such accidents at all. Where are the root cause analyses of all those mobile equipment accident investigations, and why is there no comprehenisive root cause conclusion analysis that explains why mobile equipment accidents occur according to the accident record as reported by MSHA??? Why not tell everyone what the root cause analyses of all those investigations reveal??

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Upon what statistical evidence do you think that another "TRAINING SOLUTION" will make the difference...do you have any scientific studies that back up your conclusions that make this an effective solution??

Since most of what you do is not based upon any scientific evidence, I guess it really does not matter anyway. Just keep doing what makes you feel good, and don't worry about the consequences, just like all your your forebearers...I have been involved in this insanity since the 1970's...and have seen nothing from the government worthwhile other than the training requirements ;and the standards. You have no scientific validity to back your "Solution" to fix the problem, but that is not really surprising in this political environment anyway. Keep on fixing what you don't understand.