From: Sell, Robert [mailto:Robert.Sell@draeger.com] **Posted At:** Thursday, January 08, 2009 1:22 PM

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Conversation: Federal Register/Vol. 73, No. 244 Dated Thursday, December 18, 2008:

Comment on Program Policy Letter

Subject: Federal Register/Vol. 73, No. 244 Dated Thursday, December 18, 2008: Comment on

Program Policy Letter

To Whom It May Concern:

Draeger Safety has reviewed the Program Policy Letter for Wireless Communications and Electronic Tracking Systems Guidance and we are providing the following comment for consideration as a modification to the proposed PPL:

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2. Coverage Area

b. The system also generally should provide continuous coverage along the escapeways and a coverage zone both inby and outby strategic areas of the

mine, such as belt drives and transfer points, power centers, loading points, refuge alternatives, SCSR caches and other areas identified by the District

Manager. While a coverage zone of 200 feet (line of sight) inby and 200 feet (line of sight) outby strategic areas normally should be adequate, the District Manager may require longer or shorter distances given circumstances specific to the mine.

Substantiation: Radio communications are hampered by obstructions between the personnel operating the radios and the ideal situation is that there are no obstructions which would hinder the signal.

If there should be any questions concerning our comment, please do not hesitate to contact me.

Regards

Bob Sell

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