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**From:** Roger Huczko <RHuczko@khcontrols.com>  
**Sent:** Monday, December 21, 2020 1:55 PM  
**To:** zzMSHA-Standards - Comments to Fed Reg Group <zzMSHA-COMMENTS@DOL.GOV>  
**Subject:** RIN 1219-AB93 Docket No. MSHA-2020-0018 Comments

MSHA Team,

Please see the attached document for our comments regarding the proposed rule RIN 1219-AB93 Docket No. MSHA-2020-0018.

Feel free to contact me if you have any questions regarding our comments.

Regards,  
Roger

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Roger Huczko  
President

KH Controls, Inc.  
75 Innovation Drive  
Blairsville, PA 15717-8098

[rhuczko@khcontrols.com](mailto:rhuczko@khcontrols.com)

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Regarding RIN 1219–AB93, Docket No. MSHA–2020–0018  
Testing, Evaluation, and Approval of Electric Motor-Driven Mine Equipment and Accessories  
Comments from KH Controls, Inc.  
December 21, 2020

MSHA Team,

Thank you for the opportunity to comment on the proposed rule. I have included a few comments and questions on behalf of KH Controls, Inc.

1. **INTRINSICALLY SAFE POWER:** There is wide recognition in the mining industry and the proposed rule that products certified to the Voluntary Consensus Standards could bring technology to the US underground coal mining industry resulting in improved safety and productivity. However there does not seem to be recognition in the proposed rule that there are technologies that have been evaluated by MSHA that provide improved safety and productivity relative to products certified to the Voluntary Consensus Standards. Intrinsically safe power for longwall electro-hydraulic controls is one of these technologies. The higher current systems accepted by MSHA result in up to a four to one reduction in the number of components when compared to other systems certified to the Voluntary Consensus Standards. These components include the intrinsically safe power supplies, enclosures and electrical connection devices. Will MSHA continue to evaluate and accept this type of equipment under Part 18 after the transition even though the Voluntary Consensus Standards theoretically address intrinsically safe power supplies?
2. **TRANSITION TIME PERIOD:** Please consider extending the 1 year transition period. A minimum of 3 years would be more practical.
3. **MSHA PROCESS FOR VCS PRODUCTS:** Please clarify the intended MSHA process for acceptance of products conforming to Voluntary Consensus Standards. To what extent will an application, document submittal, sample submittal, MSHA review and MSHA labeling be required? What is MSHA's long term role regarding products conforming to the Voluntary Consensus Standards?
4. **FLAMEPROOF ENCLOSURES PER IEC 60079-1:** The proposed rule states that "MSHA is proposing to include the 60079-1 standard for FP enclosures, but only for Level of Protection "da". . . . . Level of Protection "da" is applicable only to catalytic sensors of portable combustible gas detectors." Will the existing PART 18 requirements remain in effect for all other Explosion Proof Enclosures going forward?

Thank you for your consideration,

Roger Huczko  
President  
KH Controls, Inc.  
75 Innovation Drive  
Blairsville, PA 15717-8098

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[rhuczko@khcontrols.com](mailto:rhuczko@khcontrols.com)