

United Mine Workers of America



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May 18, 2012

2012 MAY 21 P 3:00

Mr. Greg Moxness, Chief
Economic Analysis Division
Office of Standards, Regulations, and Variances
Mine Safety and Health Administration
1100 Wilson Boulevard
Arlington, VA 22209-3939

Re: OMB Control Number 1219-0131

Dear Mr. Moxness:

Attached are the comments of the United Mine Workers of America on the above-named Proposed Extension of Existing Information Collection; Training, Training Plans, and Records. I ask that you forward a copy of our comments to the appropriate persons in your Agency for consideration.

Should you have any questions concerning this matter, please feel free to contact me.

Sincerely,

Dennis O'Dell, Administrator
Department of Occupational Health & Safety

**Comments of the United Mine Workers of America
On the Proposed Information Collection Request;
Training, Training Plans, and Records
May 21, 2012**

MSHA indicates that this proposal is part of the Department of Labor's continuing effort to reduce paperwork and respondent burden in accordance with the requirements of the Paperwork Reduction Act of 1995. This proposal provides the general public and Federal agencies with an opportunity to comment on proposed and/or continuing collections of information to ensure that requested data can be provided in the desired format, reporting burden is minimized, collection instruments are clearly understood, and the impact of collection requirements on respondents can be properly assessed. MSHA indicates it is particularly interested in comments that:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

UMWA COMMENT: The requirements related to this request apply at shell dredging, sand, gravel, surface stone, surface clay, colloidal phosphate, and surface limestone mines. These requirements are intended to help protect miners by ensuring that they are trained about the hazards to which they can be exposed as a result of their employment at these operations. The benefits of training can be summed up as:

- **Fewer accidents-** Errors are likely to occur if the employees lack knowledge and skills required for doing a particular job. The operators are always the responsible party for ensuring the workplace is a safe environment and that their employees are properly trained. The more trained an employee is, the less are the chances of committing accidents on the job and the more proficient the employee becomes.

The only way the Agency can perform follow up evaluations and to assure these protections are in place is to continue to collect the information as defined. The practical utility is to assure continued hazard training, a proven tool to reducing accidents and injuries at the workplace.

- Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

UMWA COMMENT: The UMWA has no way to determine if the Agencies Estimated Total Burden Hours of 137,570 hours and that the Estimated Total Burden Cost of \$315,641 is accurate so we cannot comment.

- Suggest methods to enhance the quality, utility, and clarity of the information to be collected; and

UMWA COMMENT: Qualitative research most commonly involves the systematic collection, ordering, description and interpretation of textual data generated from talk, observation or documentation. Rather than just relying on submitted written comments, observing and communicating directly with miners in the field will give the Agency a wealth of information that would be valuable in this process.

- Address the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses, to minimize the burden of the collection of information on those who are to respond.

UMWA COMMENT: The Union agrees that electronic submissions could be provided to take advantage of technology but other means must also be provided. Some miners and operators lack access to computers and computer skills so mail with hard copies will still be necessary.