

# United Mine Workers of America



TELEPHONE  
(703) 291-2400

UNITED MINE WORKERS' HEADQUARTERS  
18354 QUANTICO GATEWAY DRIVE, SUITE 200

**Triangle, VA**

22172-1779



2012 MAY 21 P 3:00

May 18, 2012

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 1219-0120

Dear Mr. Moxness:

Attached are the comments of the United Mine Workers of America on the above-named Proposed Extension of Existing Information Collection; Occupational Noise Exposure. 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 Extension of Existing Information Collection;  
Occupational Noise Exposure  
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 UMWA supports the continued collection of information as outlined in 30 CFR §62.190 Records (as shown below). The purpose of these standards is to prevent the occurrence and reduce the progression of occupational noise-induced hearing loss among miners. This part sets forth mandatory health standards for each surface and underground metal, nonmetal, and coal mine subject to the Federal Mine Safety and Health Act of 1977. 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 in 30 CFR §62.190 Records. The practical utility is to assure continued protection for our miners from hearing loss.

- 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 Agency's Estimated Total Burden Hours of hours and that the Estimated Total Burden Cost 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.

In closing, The UMWA would point out that all portions of 30 CFR PART 62-Occupational Noise Exposure are important mandates of the law. For the Agency to continue to provide enforcement protections for our Nations miners, the continuing collection of such information and records are necessary to ensure that these enforcement protections are kept. The reporting burden pales in comparison to the value added for protecting our Nation's miners.