



**Great
Northwest
Inc.**

August 24, 2016

MSHA
Office of Standards, Regulations & Variances
201 12th Street South, Ste 4E401
Arlington, VA 22202-5452

AUG 30 2016

Office of Information and Regulatory Affairs, Office of Management and Budget
New Executive Office Building
725 17th Street NW.
Washington, DC 20503
Attn: Desk Officer for MSHA.

RE: Docket No. MSHA-2014-0030

To whom it may concern:

We would like to voice our objection to the proposed rule for Examinations of Working Places in Metal and Nonmetal Mines.

The proposed rule appears to be more than the industry requires and will likely undercut an operator's ability to manage for safety. Operators have taken steps to improve safety in ways that make sense for their unique facilities, equipment, and processes. We have focused on improving staff and management behaviors at every level rather than just evaluating conditions at the start of every shift. Conditions must be evaluated by all involved personnel on a continuous operation, not just at the beginning of shift.

This proposal would also increase administrative tasks without requisite safety benefits. Some smaller operators will have a hard time complying with the administrative requirements of this proposal.

Our firm has been awarded many safety awards from MSHA and other stakeholders, and has enjoyed one of the lowest workers comp experience modifiers in our industry. This rulemaking will only add to the paperwork burden we are already saddled with and will do nothing to make our workplace safer than it already is. In fact, it could lead operators into a sense of complacency that as long as they perform the evaluations at the beginning of every shift nothing more is required. We urge you to avoid implementing this rulemaking.

The best way to improve workplace safety is through proactive methods to include education and information sharing, not recordkeeping.

Respectfully,
Great Northwest, Inc.
Randy Brand, Vice President

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