

United Mine Workers of America



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REG-21

July 3, 2025

MSHA Office of Standards, Regulations, and Variances
200 Constitution Avenue NW
Washington, DC 20210
Room C3522

Re: Docket Number: MSHA-2025-0072
Regulation Identification Number: 1219-AC18

The United Mine Workers of America (UMWA) respectfully requests a 60-day extension of the comment period for the Department of Labor's Mine Safety and Health Administration's proposed rule regarding roof control plan approval criteria (Docket No. MSHA-2025-0072, RIN 1219-AC18) that was published in the Federal Register on July 1, 2025.

The UMWA supports any effort that enhances health and safety protections for miners. However, the Agency could better ensure this rule becomes a success by allowing for additional time for comments. A 60-day extension of the comment period will allow the UMWA the needed time to review the eighteen rules published by MSHA that will require extensive research and analysis before any meaningful comments can be considered for submittal to MSHA. The Agency has normally granted requests for an extension of the comment period for nearly all previous rules it has published in the past.

The short 30-day comment period provided for the proposed MSHA rule (as well as 17 others that the Agency published at the same time) does not provide ample time to allow the UMWA to properly review, research, and develop meaningful comments that could be valuable in finalizing such rules pertaining to roof control plan approval criteria. As well as to determine the impact on our members' health and safety. Especially given the unexpected release of these rules.

Sincerely,

Josh Roberts, Administrator of Occupational Health and Safety