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July 18, 2025

James P. McHugh  
Deputy Assistant Secretary for Policy  
Mine Safety and Health Administration  
United States Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Re: Training and Retraining of Miners; Docket ID: MSHA-2025-0085

Dear Deputy Assistant Secretary McHugh:

On behalf of North America's Building Trades Unions (NABTU), its fourteen affiliated national and international unions and the three million construction workers they represent, I am writing to respectfully request a 60-day extension of the comment period for the Department of Labor's Mine Safety and Health Administration's proposed rule regarding training and retraining of miners that was published in the *Federal Register* on July 1, 2025.

On the same date, MSHA published eighteen proposed rules that each require extensive research and analysis to determine if meaningful comment needs to be provided. A 60-day extension of the comment period will allow NABTU and other stakeholders the necessary time to properly determine the rules' impact on our members' health and safety and develop constructive comments on training plan criteria for the agency to consider.

The Federal Mine Safety and Health Act (Mine Act) authorizes MSHA to establish 30-day comment periods, and to extend the comment period upon a finding of good cause published in the *Federal Register*. The simultaneous release of eighteen proposed rules, all subject to the same 30-day comment period, is good cause for an extension. Historically, MSHA has granted similar extension requests for nearly all previous rules.

We urge the agency to extend the comment period to 60 days to ensure stakeholders can provide the thoughtful and comprehensive comments necessary to support effective safety and health standards.

Sincerely,

Chris Trahan Cain  
Director of Safety and Health