



July 22, 2025

Via Email

MSHA Office of Standards, Regulations, and Variances
Washington, D.C. 20210

Re: United Steelworkers urges you to provide a 60-day extension of the comment period for Docket No. MSHA-2025-0086, the proposed rule on Trolleys (RIN 1219-AC20).

Dear Acting Director Senk:

On behalf of the 850,000 members — and specifically, the tens of thousands of miners — of the United Steelworkers union (USW), I urge you to provide a 60-day extension of the comment period for the Department of Labor’s Mine Safety and Health Administration’s (MSHA) proposed rule regarding Trolleys (RIN 1219-AC20).

USW takes seriously any proposed effort to improve the safety and health for our members, including the tens of thousands of metal/non-metal miners we represent across the country. This commitment dates back to our eight founding principles in 1942, one of which was “to secure by legislative enactment, laws protecting the limbs, lives and health of our members...and such other legislation as will be beneficial.”¹

Unfortunately, we believe that the 30-day comment period for this proposed MSHA rule does not provide us with enough time to analyze the rule, engage with our Locals on how they would be impacted, and submit a thoughtful comment before the deadline. This tight timeline is particularly amplified given the multiride of proposed actions MSHA announced, all with the same 30-day deadline of July 31, 2025.

We strongly request that you extend the comment period, so that we can provide the most robust comments possible on the proposed rule.

In Solidarity,

Roy Houseman Jr.
Legislative Director

Assistant to the International President

¹ [United Steelworkers](#), “About USW”, Accessed July 22, 2025.