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NIOSH Docket Office
Robert A. Taft Laboratories
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4678 Columbia Parkway
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Greetings:

This is to respond to 42 CFR Part 84, the proposed rule for respiratory protective devices. We are pleased to see this first step in a series of upgrades in testing procedures. This first step recognizes that the certification process addresses the health care setting, which is crucial and long-overdue.

Categorizing the minimum efficiency performance standards of the filters of particulate respirators into the three proposed levels makes sense and will eliminate the need for/use of the sometimes confusing terms: HEPA, dust/mist/fume, etc.

We believe that 95% filter efficiency should be acceptable for most health care worker needs and that the certification process will identify several respirators meeting this category that previously were believed to be inadequate respiratory protection.

Our facility recognizes and supports any regulation that protects health care workers while performing patient care. At the same time, we feel the necessary level of protection should be provided in such a manner that is efficient, as well as reasonable.

Thank you for publishing the proposed rule for respiratory protective devices. We anxiously await the results of the NIOSH certification process.

Sincerely,

Ed Rollins

Ed Rollins
Chairman, Safety Committee

Joel S. Sexton

Joel S. Sexton, MD
Chairman, Infection Control Committee

Suzie Arthur R.N.

Suzie Arthur, RN
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/wmt

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