

NORTH

January 28, 1988

84-150
RECEIVED

1988 FEB -4 PM 7:16

NIOSH

NIOSH Docket Office
Mail Stop E-23
1600 Clifton Road, NE
Atlanta, GA 30333

Dear Sir:

The National Institute for Occupational Safety and Health (NIOSH) currently certifies respirators for use in general industry, mining and construction. On August 27, 1987, NIOSH proposed (42 CFR 84, Federal Register) regulations which will have a disastrous impact on worker safety and on our industry.

The Industrial Safety Equipment Association, of which Siebe North Inc. is a part, feels strongly that this proposal must be withdrawn.

The proposal provides no protocol, nor specific requirements, so it is impossible for us to exercise our right to comment on it in a meaningful way. This denies us due process.

While our industry recognizes the value of regulation and, by and large, has little problem with the concept of workplace testing, the fact of the matter is that the technology is not available to conform to the proposed change. This is not the way to improve a process; it will, in fact, destroy a process which works but needs tuning.

Even though 90 percent of the respirators in use today are used for non-mining (industrial and construction) purposes, the proposal requires that we test all respirators under mining conditions thereby ignoring the safety interest of the majority of workers who use respirators.

Finally, the proposed changes will cost our industry up to \$700,000,000 which will threaten the very viability of the industry as well as worker safety.

The management and employees of Siebe North Inc. trust that we can count on your support in this matter of critical interest to labor and industry.

We urge you to immediately contact Health and Human Services Secretary, Dr. Otis Bowen, to request that the proposed ruling be withdrawn.

Enclosed is a fact sheet which outlines the proposal, our objections and recommendations.

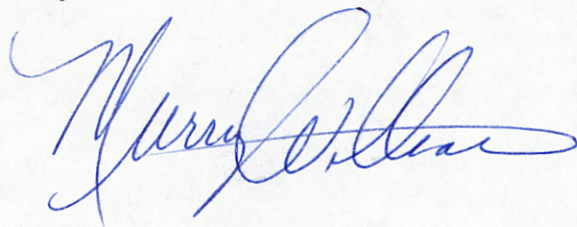
North Safety Equipment
A Division of Siebe North, Inc.

2000 Plainfield Pike
Cranston, RI 02920
401-943-4400
Telex: 6814009 VIA WUI

I look forward to hearing from you once you have contacted Secretary Bowen as we are very anxious about the resolution of this problem.

Thanks for your assistance on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Garry Bowen", written in a cursive style.