

**TESTIMONY PREPARED FOR THE NIOSH
PANEL REGARDING 42 CFR PART 84 ,
RESPIRATORY PROTECTION MODULES**

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MODULE PRIORITY RANKING

- **WRITTEN EVALUATION TO BE SUBMITTED BY
MID - AUGUST WILL HAVE RECOMMENDATIONS
FORMULATED VIA A DECISION MATRIX**

INTERNATIONAL STANDARDS

- **THERE ARE SEVERAL PERTINENT
EUROPEAN STANDARDS PROVIDING
EXCELLENT GUIDANCE**

- **EXAMPLES INCLUDE : EN 140 ; EN 147
and EN 403**

QUALITY CONTROL

- RANDOM SELECTION AT THE DISTRIBUTION OR MANUFACTURING SITE BY AN AUDITOR MUST BE THE METHOD OF OBTAINING RESPIRATORS FOR NIOSH LAB TESTING
- GOV'T MUST QUICKLY REIMBURSE VENDOR
- MANUFACTURERS MUST NOT BE ALLOWED TO SELECT THE CERTIFYING LABORATORY FOR PRODUCT CERTIFICATION. IN FACT, THERE MUST BE *INTRA AND INTER* LABORATORY CHECKS AND BALANCES. ADDITIONALLY, THERE MUST BE BLIND, AND IF POSSIBLE , DOUBLE BLIND CONTROLS

RESPIRATORY PROTECTIVE ESCAPE DEVICE

(RPED)

THREE PRODUCT ABSORPTION/FILTERING
EFFICIENCY LEVELS

- NONE or VIRTUALLY NONE
- TOXICS, EXCEPT CARBON MONOXIDE
- TOXICS AND CARBON MONOXIDE

RPED MARKETING

- ONLY THE TOXIC & CARBON MONOXIDE
(COMBINATION) VERSIONS BE LEGAL FOR
CONSUMER PURCHASE
- THE TOXIC ONLY VERSION MAY BE
ACCEPTABLE FOR USE BY HIGHLY
TRAINED INDIVIDUALS, AND UNDER CERTAIN
SPECIFIC CONDITIONS , BUT EVEN THIS MAY
CREATE A FALSE SENSE OF SECURITY
- PURCHASE AND USE COMBINATION VERSIONS