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December 2, 1987

Director
Division of Safety Research
NIOSH
944 Chestnut Ridge Road
Morgantown, WV 26505

Dear Sir:

This letter is to express the viewpoint of the management at this location concerning the proposed standard, 42 CFR Part 84, concerning respirator certification.

In our opinion, the proposed standard, with its unspecified testing requirements, would:

1. Add costs to products we need and regularly use.
2. Provide factors of protection that may not be achievable or that would significantly increase the size and weight of available respirators, and thus decrease their acceptance by employees.
3. Eliminate the certification of respirators needed in general industry.

Consequently, we could not support a standard with such deficiencies.

Sincerely,

Brian McClure
Employee Relations Manager

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