Miller, Diane M. (CDC/NIOSH/EID)

From: Alyx Fier [alyx@truenorthgear.com]
Sent: Thursday, November 19, 2009 6:28 PM
To: NIOSH Docket Office (CDC)
Subject: Supplied Air Respirators (SAR) - NIOSH Docket # 083B
Attachments: True North Letter.DOC

Please attached document.

Best regards,

Alyx Fier
President
True North LLC

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Thursday, November 19th, 2009

NIOSH Docket Office
Robert A. Taft Laboratories, M/S C 34
Supplied Air Respirators (SAR) – NIOSH Docket # 083B
4676 Columbia Parkway
Cincinnati, OH 45226
Email: niocindocket@cdc.gov

Dear Sir or Madam,

After reviewing NIOSH's proposal to change 42 CFR part 84, Subpart J, True North opposes broadening the definitions of what constitutes Supplied Air Respirators (SAR's & SAR/SCBA) systems to include items not previously covered such as carts, and other ancillary items as part of the approval process. We respectfully request NIOSH not include these items in the revision of Subpart J and instead maintain the existing method of approval that does not include them as a component part of Supplied Air Respirators (SAR's & SAR/SCBA) systems. Inclusion of carts and other ancillary items into the approval process fails to address any of the concerns stated in NIOSH's own Abbreviated Draft Preamble for 42 CFR Part 84 Subpart J.

Additional regulatory considerations proposed by NIOSH that incorporate carts and other items which are ancillary to the SAR will not improve worker safety. Inclusion of these historically unregulated items will have negative results for end users by limiting competition which in turn limits choice and ultimately creates anti-competative, monopolistic scenarios that raise costs while doing nothing to increase worker safety.

True North urges NIOSH to refrain from including carts and other ancillary items into the approval process as it provides no real added benefits and in fact results in severe economic and operational hardships for end users.

Sincerely,

Alyx Fier
President
True North LLC

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