

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

From: Claire.A.Kammer@us.ul.com
Sent: Wednesday, April 15, 2009 11:23 AM
To: NIOSH Docket Office (CDC)
Subject: 146 - (PPT) Action Planning
Attachments: 09.04.14 UL Submission Docket Number NIOSH-146.doc

NIOSH,
Per NIOSH submission instructions, attached please find comments addressing Docket Number NIOSH-146, NIOSH Personal Protective Technology Program-Plan to Implement the National Academies Evaluation Recommendations.

Any questions or issues with delivery, please do not heistate to contact me.

Sincerely,
Claire A. Kammer
Manager, Government Affairs

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the standard in safety

Underwriters
Laboratories

April 15, 2009

NIOSH Mailstop: C-34
Robert A. Taft Lab.
4676 Columbia Parkway
Cincinnati, Ohio 45226

**RE: Docket Number NIOSH-146, *NIOSH Personal Protective Technology Program-
Plan to Implement the National Academies Evaluation Recommendations***

To Whom it May Concern:

We write today to commend the National Institute for Occupational Safety and Health (NIOSH) and the National Personal Protective Technology Laboratory (NPPTL) for your efforts to advance work-related safety. The outlined plans for implementation of the National Academies' recommendations form a strong platform for continued enhancements to advance the program's mission.

As NPPTL looks to implement recommendations of the National Academies evaluation, especially those detailed in Issues 1.3 and 1.4, we do feel it is important to address proposed plans for government product testing and certification beyond the current respirator scope. We write to encourage the NPPTL to give thoughtful consideration to the role that third party certification bodies play in the advancing the safety of personal protective equipment and ensembles.

As you are likely aware, Underwriters Laboratories (UL) has served as a third party conformity assessment body for more than a century, working with fire safety and personal protective equipment (PPE) for much of that time. As an independent, 501(c)(3) we share with your program a commitment to advancing safety science to support the protection of human health and safety.

We also recognize and support efforts by NPPTL and NFPA Technical Committees to address interface issues between respirators and other ensemble components. Addressing safety from a "systems approach" is a recognized method in the standards process that serves as a useful tool where the technology interface is critical to the performance of equipment. The standards process, as it is designed, serves as the best platform for addressing these and many other issues. By putting in place the appropriate requirements in the standard and working with certification organizations and test laboratories to ensure compliance with those protocols, your organization can help ensure that the products making up the full PPE ensemble are working together effectively to protect workers, regardless of where certified and tested.

We do have concerns that taking on all PPE certification at NPPTL would be difficult to achieve and might adversely impact the advancement of protective ensemble safety. Testing of all pieces of equipment – from eye protection and hearing to gloves and footwear – will present capacity issues that would require heavy investment to ensure that products are getting approved in a timely manner and into the marketplace. This is especially true with new advancements in safety technology, as it is essential that new innovations that might further enhance workforce safety move smoothly and quickly into the market.

We agree that products should be thoroughly tested to establish compliance with state of the art performance standards and be manufactured in quality facilities. However, we believe that independent certification organizations and laboratories play a critical role in this approach. Accordingly, we believe that the NPPTL should continue its efforts in standards reform, and it should also focus efforts on certification organization and testing laboratory qualification criteria to ensure that the labs doing the testing are adhering to the appropriate protocols and have the necessary expertise.

As you look to implement these strategies and expand on-going PPT Program standards and certification efforts, we would welcome an opportunity to collaborate with your program on how best to find the appropriate balance between government and private laboratories in ensuring that safer products and systems are available to protect the American workforce. We will follow up with your office in the coming weeks, or in the interim please feel free to contact me at (202) 296-8092. We look forward to working with you.

Sincerely,

A handwritten signature in cursive script that reads "Claire A. Kammer".

Claire A. Kammer
Manager, Government Affairs
Underwriters Laboratories, Inc.