



July 20, 1994

NIOSH Docket Office
Robert A. Taft Laboratories
Mail Stop C34
4676 Columbia Parkway
Cincinnati, Ohio 45226

To Whom It May Concern;

This letter is in response to the rule changes regarding the use of Respiratory Protective Devices that were announced in the Tuesday, May 24 Federal Register.

We would like to commend NIOSH for responding to the legitimate concerns of health care providers by introducing both science and common sense into the process for certifying respiratory protective devices.

The current rules concerning the use of HEPA respirators for prevention of TB transmission, fail to take into account three important factors in delivering patient care. The factors are:

1. Comfort
2. Communication
3. Cost

The HEPA respirators that are currently mandated by NIOSH are very thick and difficult to breath thru. The masks significantly increase the work of breathing for for the user and are very hot. Hospital workers find in very difficult to breath thru these devices to for extended periods of time. The result of the discomfort is that compliance with these respirators is less then 100%. A respirator that is not worn provides no protection what so ever to the health care worker.

The thickness of the HEPA respirator also makes communication very difficult. Hospitalized patients often have difficulty hearing. Even patients with normal hearing have difficulty understanding a health care worker who is wearing a HEPA respirator. A patient with a hearing difficulty is often completely unable to understand a health care worker that is wearing one of these devices.

The cost of HEPA respirators is very high. HEPA respirators cost between \$5.00 and \$6.00. The cost of dust mist respirators is under one dollar. There is no scientific evidence that a HEPA respirator is superior to a dust mist respirator for prevention of the spread of TB.



Jul 19, 1994

Page 2

Once again we would like to commend NIOSH on the common sense changes that have been proposed for Respiratory Protective Devices. We strongly support these proposed changes.

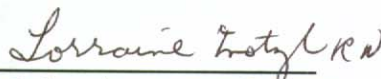
Sincerely;

Peter Holtermann



Director of Respiratory Therapy

Lorraine Motyl



Infection Control Nurse