



**MOLDEX
METRIC,
INC.**

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10, December 1987

Nelson Leidel, Docket Officer
NIOSH M.S. E-23
1600 Clifton Rd, NE
Atlanta, GA 30333

Dear Dr Leidel:

On behalf of Moldex-Metric Inc I would like to request time to comment on the proposed NIOSH 42CFR84 document at the San Francisco public hearing on January 20, 1988. We would like to be allotted 15 minutes for our presentation and I would be the presentor. Enclosed you will find an outline of the talk.

Thank you for your time in consideration of this request.

Sincerely,

Jeffrey S Birkner
Technical Service Manager

JSB/jm

NIOSH
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SUMMARY OF MOLDEX-METRIC'S COMMENTS FOR
NIOSH PUBLIC MEETING

- I. Introduction
 1. Moldex as a Safety Product Manufacturer
 2. Member of ISEA - Active Participant
- II. Proposed 42CFR84
 1. Need to revise standard
 - a. Standardization for manufacturers
 - b. Protection of the public
 2. Ramifications of reduced NIOSH involvement in certification
 - a. Standardization of testing
 - b. Cost aspect
- III. International standardization of certification (e.g. CEN)
 1. Benefits
 - a. Workplace testing
 - b. Using various test stands
 2. Standardization amongst advanced industrial nations
- IV. Conclusions