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**ISEA** THE SAFETY EQUIPMENT ASSOCIATION

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Due 9/8/99

August 19, 1999

Dr. Greg Wagner, Director  
Respiratory Disease Studies Division -B101  
National Institute of Occupational and Safety Health  
1095 Willowdale Road  
Morgantown, WV 26505

Dear Dr. Wagner:

ISEA—The Safety Equipment Association has recently met with two of your division branch chiefs, Dr. Paul Jensen and Mr. Richard Metzler. During discussions with them, ISEA has learned that NIOSH is contemplating the inclusion of a fit test requirement for respirators in the draft revision of a new Administrative and Quality Assurance module.

ISEA has always been a supporter of the modular approach to NIOSH rulemaking. We believe that it allows everyone to address the actual issues in a proposed regulation without numerous controversial and unrelated issues clouding the needed revisions to the standard.

Fit testing and the administrative and quality assurance needs are not related and therefore should not be addressed in the same rulemaking. Properly designed fit testing protocols have not been validated for use in product certification and there is significant controversy surrounding the whole concept of the meaning of such testing. OSHA, when faced with dealing with a similar issue, assigned protection factors, chose to carve it away from its proposed 29CFR1910.134 respiratory protection regulation, rather than delay the whole regulation while dealing with this one issue.

The Administrative/QA Module contains important new requirements that will lead to additional NIOSH funds, improved product assurance for users of respirators, and the ability of manufacturers to submit respirators with new technical advances that users need which are not allowed under the current 42CFR84. We believe that the Administrative \ QA module should not be delayed, and the inclusion of a highly controversial, technical issue such as fit testing would surely delay the promulgation of this new module.

I look forward to receiving additional details of this proposal. If you have any questions please do not hesitate to contact me.

Sincerely,

*Janice C. Bradley*

Janice Comer Bradley, CSP  
Technical Director