July 20, 1994

NIOSH DOCKET OFFICE
Robert A. Tafts Laboratories
Mail Stop C34
4676 Columbia Parkway
Cincinnati, OH 45226

RE: Approval of "Class C" respirators

The restriction of health care workers (HCW) to the use of HEPA filter respirators for TB control because there has been no authorized certification procedures to evaluate the efficacy of other respiratory types is dramatic "overkill."

The approval of a certification procedure for the new generation "Class C" respirator is strongly recommended. These respirators deliver protection to a 95% level at the 0.3 micron particle size. This level of filter efficiency should be acceptable for most HCW needs.

The new testing and certification procedures will enable manufacturers to produce a broader range of more practical and economic respirators that meet the performance criteria established by the CDC for respiratory-protective devices for TB.

It is anticipated that these respirators will be more economically priced than the more stringent HEPA respirators.

We seek to provide quality care to our patients in the most cost effective manner possible while providing appropriate protection to our care-givers. The "Class C" filters would appear to support this goal.

Your support of our request will help to ensure the fulfillment of our goal.

Thank you,

Respectfully yours,

ST. CLAIRE MEDICAL CENTER

Roger D. Russell
Safety Officer
SC