NIOSH Docket Office  
Mail Stop E-23  
1600 Clifton Rd. NE  
Atlanta, Ga. 30333

RE: Proposed 42 CFR 84

Gentlemen;

We are opposed to the proposed criterion for respiratory protection certification. Our reasons include: 1) Apparent focus of criterion based on standards that only reflect realistic needs of only 10% of the nations respirator use; 2) The certain increase in the cost of respiratory protection to the respirator manufacturers and end-users; and 3) The deleterious effect on worker safety.

Our recommendations are: 1) That proposed 42 CFR 84 be rewritten; 2) NIOSH should continue testing respirators as part of the certification protocol; and 3) Work place testing should only be instituted when technology is developed to make it reliable.

Please accept our hesitancy concerning this proposal.

Respectfully,

Robin Roberts  
Branch Manager

RR:11