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Sent: Monday, April 20, 2009 6:49 PM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 146 - PPTActionPlan Comments

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Comments

Specifically on Recommendation 2: Establish Research Centers of Excellence and Increased Extramural PPT Research.

The response and planned activities are only partially responsive to this recommendation. Proposed actions focus, almost entirely, on increased extramural research through mechanisms currently existing in OEP. The response sidesteps the specific recommendation to develop and support centers of excellence that "work closely with NIOSH intramural and research programs to improve PPT, increase field research..." Furthermore, the proposed actions to coordinate extramural research and prioritize needs for research in PPT, ignores the potential areas where technology leveraging have already been identified which could immediately be supported through creation of focused COEs. These areas include dermal protection, respirator classification, PPT component operability, and barriers to use of PPT by workers. These research aspects are not addressed NIOSH educational training centers. As recognized by the committee report, this will require the formation of new research oriented COEs which can develop unique research agendas and synergies with NPPTL.

Other proposed implementation actions appear to be designed to coordinate single issue OEP extramural projects and hold research review meetings on these OEP projects. While this is no doubt beneficial, these activities should not be substituted for the need for the fully integrated and focused extramural research that can uniquely occur in COE's. Nor can these activities provide the same potential for leveraging existing laboratory infrastructure and significant cost saving that are possible with COE's.

The proposed implementation plan has many fine points which should be beneficial to NPPTL and NIOSH, and most importantly to worker safety and health. However, in my opinion, the proposed implementation plan seriously misses the intentions regarding the need for COE's, which is among the most clearly and unequivocally stated recommendations in the committee's report.