

# **ISEA** Industrial Safety Equipment Association

June 9, 1994

NIOSH Docket Officer  
NIOSH Docket Office  
Robert A. Taft Laboratories  
Mail Stop C34  
4676 Columbia Parkway  
Cincinnati, Ohio 45226

Dear Sir:

In accordance with the NIOSH proposed rule for certification of respiratory protective devices at 42 CFR part 84, as published in the May 24, 1994 **Federal Register** (59 FR 26850) the Industrial Safety Equipment Association (ISEA) is requesting to participate in and provide oral comments at the informal public meeting scheduled for June 23/24, 1994 at the Vista Hotel, Washington, D.C..

ISEA is the leading national association for manufacturers of personal protective equipment and represents members who produce 95 percent of the respirators manufactured in the United States. This rulemaking is vitally important to the manufacturers of these products since it will directly affect their ability to produce new, higher performing respirators. The cost impact of redesigning and retooling their operations to conform to the newly proposed requirements warrants that ISEA be given ample time to address various issues raised by the NIOSH proposal. Therefore, ISEA is requesting that it be allotted 4 hours starting the afternoon of the first day, Thursday, June 23 to provide oral comment to the newly proposed regulation. In addition, ISEA recommends that the discussions be an interactive session between ISEA and NIOSH.

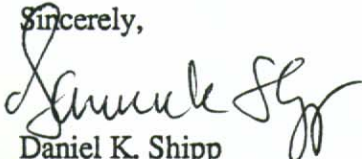
The ISEA presentation will be structured as follows:

<u>TOPIC</u>	<u>SPEAKER</u>
(1) Introduction.	Dan Shipp, President ISEA
(2) The Modular Approach & Grandfathering Provisions.	Barry Phillips, Scott Aviation, (Chair ISEA Respiratory Group)
(3) Test Protocol/Equipment, Air Flow Resistance, Filter Efficiency.	Bill Newcomb, North Safety
(4) Powered Air Respirators, Test Statistics.	Michael Bennett, Racal Health & Safety.
(5) Fit Testing, Assigned Protection Factors.	Don Wilmes, 3M

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ISEA appreciates the opportunity to contribute to the development of improved respiratory regulations that will provide the best protection available to end users. Please contact me if you require additional information.

Sincerely,



Daniel K. Shipp  
President

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