

1549 Morton Avenue  
New Bedford, MA 02745  
June 15, 1994

NIOSH Docket Office  
Robert A. Taft Laboratories  
Mail Stop C34  
4678 Columbia Parkway  
Cincinnati, Ohio 45226

Re: Proposed Rule on Respiratory Protective Devices (42 CFR Part 84 Fall Register, Volume 59, No. 99, pp. 26850-26893)


As a healthcare professional, Registered Nurse, Registered Respiratory Therapist, Certified Registered Nurse Anesthetist, and a Senior Administrator in an acute care facility, I am concerned with the potential impact of proposed changes in regulations that have the potential to seriously impact the cost of healthcare.

From the clinical perspective, I have read the articles and C.D.C. guidelines dealing with this subject. Clinically speaking, we must provide protection for workers in the field. Certainly, standards must be followed to ensure that products and personnel are safe. However, it is the cost of the process that must be seriously considered along with the reasonability of the change in practice that would be required in order to gain the broadest possible compliance that is of concern.

President Clinton informs us all that the goal of healthcare reform is "reasonable quality at a reasonable price". At present, I hear from Infection Control circles that the proposed changes will result in increased cost. Each proposed mask is expected to cost \$4.50 each with most disposable presently costing pennies by comparison. New York City hospitals would pay \$49 million to implement the proposed changes according to an article presented in Materiel Management.

Your focus on manufacturers is the appropriate target. They must come up with the design features to satisfy both standards of quality as well as reasonable price. This must be the direction we take as the system cannot accept yet another regulated increase in cost. In addition, please allow the time needed to develop a replacement product and leave the present system in place while alternative solutions are being considered. Thank you for the opportunity to comment.

Sincerely,



John P. Gurney

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JUN 20 1994