



DEPARTMENT OF EPIDEMIOLOGY  
AND INFECTION CONTROL

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July 15, 1994

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

Subject: May 24, 1994 Federal Register - NIOSH Proposed Rule for  
Reclassification of Particulate Respirators

Gentlemen:

I am in favor of the reclassification of particulate respirators and encourage the certification of a Class C respirator for use by health care providers for prevention of exposure to Mycobacterium tuberculosis (TB) patients. I strongly agree with the proposed certification process.

I advise against the mandate for a fit testing procedure with the Class C particulate respirator as the surgical mask, when worn by health care providers, is a time-proven method for prevention of exposure to TB. The surgical mask cannot be fit tested due to the design. Nevertheless, the surgical mask consistently prevented exposure to TB. Therefore, the Class C respirator designed to fit the contours of the face more snugly than the surgical mask will also prevent exposure to TB. The use of fit testing is a very expensive and needless procedure for the Class C respirator.

Sincerely,

Stuart H. Cohen, M.D.  
Clinical Director  
Department of Epidemiology/  
Infection Control

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