

July 18, 1994

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

To Whom It May Concern:

I am writing to comment about the HHS/NIOSH Respiratory Protective Device Proposed Rule. I urge you to promptly pass the HHS/NIOSH Respiratory Protective Device Proposed Rule.

I endorse the proposed certification procedures to include a class C respirator for the care of patients with tuberculosis.

- There is no scientific evidence that a HEPA style respirator is required to protect healthcare workers and the public from patients with known or suspected tuberculosis.
- Conversely, there is no scientific evidence that a Class C respirator, as described in the **FEDERAL REGISTER**, ***does not provide sufficient protection.***
- HEPA style respirators are difficult to wear.
- HEPA style respirators may reduce the ability of healthcare workers to provide optimal care to patients with tuberculosis.
- In these cases, the HEPA style respirator may reduce the quality of patient care while providing no additional protection over the proposed class C respirator

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There is considerable cost control pressure facing my institution. Implementation of tuberculosis protection using a HEPA style respirator will exacerbate these pressures.

- The class C respirator is 85% **less expensive** than the HEPA style respirator.
- Without scientific documentation that the HEPA style respirator is required for protection, mandated use of the HEPA style respirator will certainly drive up healthcare costs.
- The Class C respirator regulation, if promptly passed, will help to hold down healthcare costs.

Sincerely



David L. Dunlap, BA, RRT, RCP
Director of Respiratory Care

DLD/dld

cc: file

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