

84-085

MOTOR VEHICLE MANUFACTURERS ASSOCIATION
of the United States, Inc.

300 NEW CENTER BUILDING • DETROIT, MICHIGAN 48202 • AREA 313-872-4311
TLX NO. 1009770 AUTOMAKERS DET

DONALD E. PETERSEN, *Chairman*
THOMAS H. HANNA, *President and Chief Executive Officer*

December 21, 1987

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NIOSH

Mr. John Moran, Director
Division of Safety Research
National Institute of Occupational
Safety and Health
944 Chestnut Ridge Road
Morgantown, West Virginia 26505

Dear Mr. Moran:

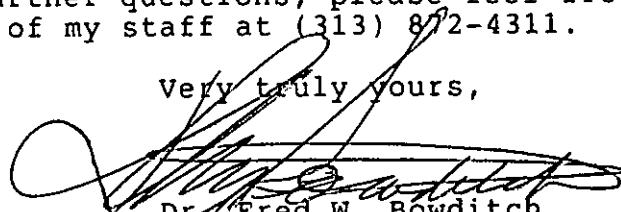
The Motor Vehicle Manufacturers Association (MVMA) submits the following comments in response to the proposed revision of Tests and Requirements for Certification of Respiratory Protective Devices, 42 CFR 84, which appeared in the Federal Register of August 27, 1987. It is our understanding that the comment period has been extended to December 28, 1987. These comments are made in response to the proposed revisions under this extension deadline.

We are concerned about the modification of the existing rules and the replacement by the revised approval procedures and the technical requirements for respirators as proposed by the National Institute of Occupational Safety and Health (NIOSH). MVMA believes that an effective testing and certification program for respirators run by an agency of the Federal government will give assurance to employers and employees alike that their respirators have passed a certain minimum standard for quality and performance. However, we have concern about the new proposed standard for respirator certification in 42 CFR Part 84 which we feel can have a negative impact on both the user and respirator industry.

MVMA supports the comments made by the Organization Resource Counselors, Inc. regarding the proposed revisions to the Testing and Requirements for Certification of Permissibility of Respiratory Protective Devices.

Should you have any further questions, please feel free to contact Robert S. Ajemian of my staff at (313) 872-4311.

Very truly yours,



Dr. Fred W. Bowditch
Vice President
Technical Affairs Division

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