

Miller, Diane M. (CDC/NIOSH/EID)

From:
Sent: Thursday, September 27, 2007 10:59 AM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR); Doyle, Glenn (CDC/NIOSH/EID)
Subject: 111 - NPPTL-FARR Comments

Name

Organization

Email

Address

Comments

I have only a few comments:

- 1)The presentation from the May 9-14 2004 conference makes it abundantly clear that the current panel DOES NOT reflect the current population derived from data taken in the 1967-68 Air Force study.
- 2)The same presentation showed that 16% of the current population does not fit the panel at all (meaning if respirators were designed to fit the panel exactly, which fortunately they are not, they would actually fit a maximum of 84% of the population). The intent of the panel is to fit a much greater segment of the population.
- 3)The panels must be replaced even if the current measurement method is kept.
- 4)Continuing to use the same panel for another 11 years (see Draft roadmap 14 August 2007) while perfecting measurement methodology results in a false sense of "fitting the population" today.
- 5)No periodic update is proposed in the draft plan to re-evaluate the panel in the future.

Under the current plan, product will be designed to meet the current flawed standard for many more years ignoring pressure from customers for better fitting products. If the life expectancy of a product is only 10 years we will be using products developed using the current panel for another 20 years. By that point in time another generation of users will have come and gone in the workforce invalidating even the latest published panels.

A much simpler plan must be created to immediately revise the current panel using current measurement methods if necessary. It must be revised periodically on a schedule (perhaps every 5 years or so) for its ability to represent the population. During these re-evaluation periods new methods may be tested using the same individuals allowing for correlation between old and new methods. In the mean time, the new measurement method can be developed in parallel for deployment as scheduled sometime around 2020. Periodic re-evaluation of both the population and measurement methods must continue even after this point to ensure products continue to fit people and methods do not become technologically obsolete.

The immediate results of following this plan will be that products currently in development will more closely fit the current population while keeping everyone informed. It will also allow for the incorporation of new measurement technologies and changes in the population for a very long period of time.

Doing nothing until the standard becomes nearly 50 years out of date will only increase the number of acceptable product that is being rejected and unacceptable product that is being accepted.