



July 20, 1994

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

Dear Sirs:

This letter is in regard to the proposed rule on certification of respiratory protective devices published in May, 1994. Many institutions and organizations have criticized the draft guidelines for TB Control published by the Centers for Disease Control & Prevention (CDC) because of the respiratory protection requirements. Our institution joins these others in criticizing these guidelines due to the lack of documented efficacy and cost of HEPA respirators (especially disposable respirators) in this setting. Your new proposed rules on respiratory protective devices helps, we think, with the latter problem with HEPA respirators.

We support the proposed changes in respiratory certification and ask that these changes be implemented as soon as possible. We hope that these changes will allow development of less expensive more "user friendly" devices that meet the needs of all healthcare workers.

Sincerely,

A handwritten signature in black ink that reads "Jeff Douglas MD". The signature is written in a cursive, flowing style.

Jeff L. Douglas, M.D.
Infection Control Director

JLD/sl

JUL 26 1994