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January 11, 1988

FEDERAL EXPRESS

NIOSH Docket Officer
Mail Stop E-23
1600 Clifton Road NE
Atlanta, GA 30333

Re: Request for Appearance to Comment on Proposed Rulemaking
for Certification of Respirators, 42 CFR Part 84

Dear Sir or Madam:

Wickens, Koches & Cale, legal counsel for the Industrial Safety Equipment Association, hereby submits this Request for Appearance and opportunity to present oral comments on proposed rule 42 CFR Part 84 at the January 27 public meetings in Washington, D.C. Wickens, Koches & Cale requests a minimum of fifteen minutes to present its views.

Briefly, our comments will focus on the need to withdraw the proposed rule because of the failure to provide adequate notice to interested parties, as required by the Administrative Procedures Act, and the failure to prepare a regulatory impact analysis, as required by Executive Order 12291.

Please address all correspondence to:

Gregg M. Paley
Wickens, Koches & Cale
Suite 1100
818 Connecticut Avenue, N.W.
Washington, D.C.
(202) 775-2400

Sincerely,

Gregg M. Paley

Gregg M. Paley

GMP:lmb