



**CONTINENTAL  
SAFETY EQUIPMENT**

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December 23, 1987

NIOSH Docket Office  
Mail Stop E-23  
1600 Clifton Road, N.E.  
Atlanta, GA 30333

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NIOSH

Gentlemen:

As a distributor of respiratory protection to industry and trades, I am writing to object to the proposed change in respirator certification procedures.

These changes would be costly to the manufacturer, the distributor, and the end user of the product.

Under the proposal, the requirement to test respirators under mining conditions is totally inappropriate to the bulk of users in our market area.

The proposal to initiate workplace testing of respirators is an unwarranted burden on the end user, as it is impractical with today's technology.

I therefore urge you (to avoid massive disruption in this important market and to not expose U.S. workers to unnecessary hazards), to:

1. Withdraw the proposed 42 CFR 84.
2. Continue testing respirators as part of the certification program.
3. Delay workplace testing until reliable technology is available.

Sincerely,

CONTINENTAL SAFETY EQUIPMENT, INC.

Charles B. Westerberg  
President

CW/pm