



American Felt & Filter Company

James J. Iaquinto
Vice President

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

REF.: 42 CFR, Part 84

Gentlemen:

As suppliers of respirator filter media, we wish to make comment on the proposed new respirator certification procedures published by NIOSH in the Federal Register for October 26, 1987. These comments fall into two categories: risk/benefit considerations, and industry competitiveness.

Risk/Benefit Considerations:

1. The proposed D.O.P. test will oblige existing respirator filter media to pass test conditions which they will never encounter in working use in the majority of their presently recognized applications. The inevitable result will be to disqualify all electrostatic type media produced or producible by ourselves and our competitors for reasons which will confer no safety benefit on respirator users in the great majority of applications.
2. Filter media which could reasonably be expected to pass the proposed new test procedures do not presently exist, to the best of our knowledge or of our safety products industry customers.

We believe that the existing categories of media which would be closest to passing the proposed new test procedures would be glass

fiber type. Glass fiber media producers are without exception geared exclusively to mass production and are unable to customize their products for an industry as small as the respirator industry, and this has been consistently demonstrated. In fact, we are presently working to substitute existing fiberglass prefilter media for several of our safety industry customers precisely because of this inherent problem.

3. Our Company is proud of the fact that we have technically refined and improved our electrostatic media continually since its introduction, without any legislative pressure or advances in test methodology. The result has been that our electrostatic respirator filter media have had an unblemished safety record in use across all known industry applications.

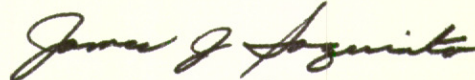
Industry Competitvity:

1. We believe that our Company and its U.S. competitors, who produce electrostatic respirator filter media, along with all U.S. respirator manufacturers, will have their ability to compete in lucrative export markets seriously impaired if their electrostatic-based products manufacturing has to be limited to foreign requirements, with resultant loss of the present economies of scale.
2. Such a drastic change of standards as that proposed is likely to open the U.S. market to imports of new respirators and respirator filter media from more adaptable developed countries such as Japan and West Germany, whereas under present regulations such imports are on a minor scale.

We would like to see the best possible balance struck between the continuing paramount safety of industrial respirator wearers, the affordability of industrial respirators and the continuing competitiveness of the respirator filter media and respirator products industries, both in this country and in their respective foreign markets.

If more background information is required in support of the above comments, we will be glad to furnish this to the best of our ability.

Yours sincerely,



James J. Iaquinto
Vice President

JJI:JCP/sew