

September 2, 1999

NIOSH Docket Office
Robert A. Taft Laboratories
4676 Columbia Parkway
M/S C-34
Cincinnati, OH 45226

Re: FR Doc. 99-21890

Dear Sir or Madam:

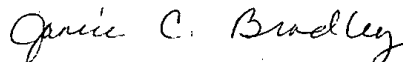
ISEA has always been a supporter of the modular approach to NIOSH rulemaking. We believe that it allows everyone to address the actual issues in a proposed regulation without numerous controversial and unrelated issues clouding the needed revisions to the standard.

We appreciate the opportunity to comment on the Federal Register Notice dated August 24, 1999 which announced a change in NIOSH priority order as well as indicating that the modification of the Administrative/Quality Assurance Module may include requirements for a validated fit test.

ISEA believes that fit testing and the administrative and quality assurance needs are not related and therefore should not be addressed in the same rulemaking. Properly designed fit testing protocols have not been validated for use in product certification and there is significant controversy surrounding the whole concept of the meaning of such testing. OSHA, when faced with dealing with a similar issue, assigned protection factors, chose to carve it away from its proposed 29CFR1910.134 respiratory protection regulation, rather than delay the whole regulation while dealing with this one issue.

The Administrative/QA Module contains important new requirements that will lead to additional NIOSH funds, improved product assurance for users of respirators, and the ability of manufacturers to submit respirators with new technical advances that users need which are not allowed under the current 42CFR84. We believe that the Administrative \ QA module should not be delayed, and the inclusion of a highly controversial, technical issue such as fit testing would surely delay the promulgation of this new module.

Respectfully Submitted,



Janice C. Bradley, CSP
Technical Director