

July 1, 1994

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

Dear Sirs:

I am writing in support of the proposed rule on Respiratory Protective Devices, which includes changes in the current procedures for testing and certifying air purifying respirators used for TB control. I support the proposed standard as an important first step in improving the certification process for respiratory devices for protection against tuberculosis and other biologic hazards in the health care setting.

The current regulations which recognize only the HEPA mask have proven to be economically and practically unfeasible. In addition to evaluating the new Class C model respirator, I would hope that some further evaluation of DM and DFM masks will be performed to evaluate their performance. I have treated tuberculosis patients for over ten years and I still have a negative tuberculin skin test, even in the absence of stringent NIOSH testing of masks or OSHA regulation of policies.

While devices such as the HEPA mask might be desirable in situations such as biological warfare, this level of regulation and intervention by government agencies does not appear indicated for the day to day treatment of tuberculosis patients.

Sincerely,

Hoyte Burdick, MD, FACP, FCC Vice President of Medical Affairs

HJB/vgg