The Sefferson 84-101

35)

December 29, 1987

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

Reference: 42 CFR Part 84

Dear Sir:

As a former government regulator with significant and relevant experience in the regulatory process in general and occupational safety and health in particular, I respectfully request to speak on the public policy implications of your proposed rulemaking regarding industrial respirators.

In accordance with the instructions printed in the Federal Register, the following information is provided:

Name: Mark D. Cowan

Address: The Jefferson Group

1823 Jefferson Place, NW Washington, DC 20036

Phone: (202) 833-3535

Business Affilliations: President, The Jefferson Group

Summary: The public policy implications of this proposed rule are profound and need to be addressed in a public forum. As a former Deputy Administrator of OSHA, Chief of Staff at the U.S. Department of Labor and a consultant to the respirator industry, my comments will reflect this dual perspective

my comments will reflect this dual perspective and, I hope, be useful to NIOSH officials in their

deliberations.

Time: January 20, 1988; San Francisco; 30 minutes

Thank you for your consideration.

Sincerely,

Mark D. Cowan President Roch 14/88