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Sent:

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To:

NIOSH Docket Office (CDC)

Cc:

Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)

Subject:

215 - NIOSH Guideline: Application of Digital Radiography for the Detection and Classification

of Pneumoconiosis Comments

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Comments

While I am in general agreement with the general concepts and ideas in the document, you have not included several of the potential benefits of digital radiography including image post processing, (ie. CAD) and/or the potential benefit of other modalities including Dual Energy Subtraction

Radiography and possibly tomosynthesis. Also not included was the ability of many businesses to utilize the facilities of their local hospital or medical center that may be much closer to them than other facilities that still administer a film based chest PA radiograph.

Further, for those companies who will maintain and utilize their own digital radiography equipment, direct transmission of digital radiographs to a long distance to remote reading sites is possible and may be more beneficial given various levels of expertise in B-readers. These sites may be able to use post-processing techniques that will improve the diagnostic value of screening. While these comments are not directly technical, the possible benefits could be pointed out to potential users.