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Company NIOSH Docket Office

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RE Concept for CBRN Full Facepiece Air

Purifying Respirator Standard

We respectfully request and recommend that the following change be made to the subject draft concept paper:

<u>Text to be changed</u>: Communications Section 4.4.6, Paragraph b.): "Data for the MRT will be collected with a steady background noise of 60 dBA consisting of "pink" noise."

Replace with: "Data for the MRT will be collected with a steady background noise of 70 dBA consisting of "pink" noise."

Reason for the change: The 60 dBA background noise level of paragraph b.) is per the recommendation of NFPA 1981 Standard on Open-Circuit Self-Contained Breathing Apparatus for Fire and Emergency Services, 1999 Edition. NFPA has increased the background noise level to 70 dBA in the 2002 Edition, Communications Test section, in paragraph 8.10.4.15. We recommend that the NIOSH Standard be changed to agree with the latest NFPA Edition.

At the October 16<sup>th</sup> –17<sup>th</sup> Public Meeting in Canonsburg, PA, the response to the question from the floor, will NIOSH adopt NFPA 1981 Standard, 2002 Edition, was that the standard was written for fire fighters wearing SCBAs and NIOSH felt that the ambient noise level at a inhalation hazard event is not as noisy as a fire event.

While the NFPA 1981 standard is written for Fire and Emergency Services community it is readily apparent that the background noise level at an inhalation hazard/emergency event can be as noisy as that of a fire incident. First responders for fire or inhalation hazards are subject to many of the same ambient noise levels as produced by trucks, generators, power washers and explosions.

Incidents involving first or emergency responders and inhalation hazards and/or possible terrorist hazards have quite noisy environments. For example, communications at the WTC, particularly during the first few days were difficult for the search and rescue personnel because the radios were not effective on a consistent basis. They had to rely on face-to-face communications during the execution of much of their searches. Not having effective communications in a noisy environment could put the safety of the individuals at risk.

Military special operations groups have long recognized the communications problems for those wearing protective masks. They have historically adopted voice amplifiers to help them to over come these problems.

The next generation of protective mask called the JSGPM being developed for the Army Special Operations community is specified to include a voice amplifier for each protective mask. They have recognized the need for better communications while wearing a protective mask.

Please consider this request for change. Do not hesitate to contact us for further information if needed.

Very truly yours,

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Jeff Stewart

Product Manager