

December 20, 2010

The Honorable David Michaels
Assistant Secretary of Labor for Occupational Safety and Health
OSHA Docket Office
Docket No. OSHA-2010-0032
U.S. Department of Labor
Room N-2625
200 Constitution Avenue, NW
Washington, DC 20210

VIA ELECTRONIC SUBMISSION

Dear Assistant Secretary Michaels:

As the world's largest professional organization of, by and for audiologists, with over 11,000 members, the American Academy of Audiology (the Academy) applauds the work of the Occupational Safety and Health Administration (OSHA) on its continued efforts to ensure hearing preservation of America's workforce. The Academy appreciates the opportunity to offer remarks for the Agency's recent solicitation of comments regarding the interpretation of the term "feasible administrative or engineering controls."

It is estimated that more than 31 million Americans experience some degree of hearing loss, a number expected to rise to 78 million by 2030. An alarming number of hearing disorders occur because of, or are exacerbated by, the presence of harmful noise levels in the workplace. Exposure to dangerous noise levels can lead to hearing loss and tinnitus, both of which can be detrimental to the quality of life of American citizens. The Academy appreciates OSHA's efforts to minimize this exposure.

The proposed interpretation suggested by OSHA, in effect, would transfer more of the onus of hearing protection to employers and the safety efforts employed in their facilities. While the Academy recognizes that this may, in some instances, result in greater costs to employers upon implementation, it will largely reduce the incidence of harmful noise exposure, and we commend your efforts.

The cost of implementation of these safeguards is a small price to pay for lessening the occurrence of noise-induced hearing loss. Hearing loss, if left untreated, can lead to loss of income, and also social isolation and depression, and can affect the safety and emotional well-being of those who experience it. Ensuring safe noise levels in the workplace will result in decreased costs to our health care system and a greater number of Americans will be able to enjoy better physical and mental health, and the quality of life that they deserve.

While the Academy strongly advocates that Americans who work in noisy settings employ the use of Personal Protective Equipment (PPE) in addition to any administrative or engineering controls, we appreciate your efforts to set standards to minimize risks by first guaranteeing that workplace facilities are safe for every-day exposure.

Again, we thank you for this opportunity to comment. Please contact Melissa Sinden, Senior Director of Government Relations, at 202-544-9335, or by email, msinden@audiology.org, if you should need additional information or clarification regarding the Academy's comments.

Sincerely,

A handwritten signature in black ink that reads "Patricia B. Kricos". The signature is written in a cursive style with a large initial "P" and a distinct "K" for the last name.

Patricia B. Kricos, PhD
President