

Dragon, Karen E. (CDC/NIOSH/EID)

From: mkelley@ohiohealth.com
Sent: Tuesday, November 27, 2007 8:40 AM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR); Doyle, Glenn (CDC/NIOSH/EID)
Subject: 110 - TDSH Comments

Name

Michael T. Kelley, MD MPH

Organization

WorkHealth/OhioHealth

Email

mkelley@ohiohealth.com

Address

**1166 Dublin Rd.
Columbus, Ohio 43215**

Comments

Our Occupational clinics examine about 2500 - 3000 drivers per year. About 10 months ago we instituted the guidelines recommended by the National Sleep Foundation, Chest Physicians and ACOEM, which were published in AJOEM in September 2006. We have referred a significant number of drivers for sleep studies based on these guidelines and our preliminary results show that approximately 70 - 80% of those referred have sleep apnea (much too high a positive rate for a screening test. The frightening point is that the majority either did not know or did admit to having sleep problems on the history form. The other frightening aspect is that there are a couple of large national carriers that no longer use our service because we are identifying "too many" drivers at risk. Drivers have told us they have heard about this new physical evaluation on their all-night radio shows.

Based on our experience I am concerned that your survey will significantly underestimate the problem. I wish you success.

M Kelley