



21 Oct, 2019

Mr. Knox Williams
American Suppressor Association
Baton Rouge, LA

RE: H.R. 367/S.59 - 115th Congress: Hearing Protection Act of 2017

Dear Mr. Williams

The National Hearing Conservation Association (NHCA) is aware of the introduction of H.R. 155 and its companion bill S. 817, both referred to as the "Hearing Protection Act" in the 116th Congress (2019-2020). The primary purpose of these bills is to ease restrictions on access to firearm noise suppressors making these devices more readily available to law abiding individuals.

Noise-induced hearing loss (NIHL) is a significant health problem among U.S. adults and children. Further, NIHL and tinnitus (ringing in the ears) resulting from firearm noise exposure are considerable public health concerns negatively impact the quality of life for individuals and their families in many ways: financial, social, and occupational.

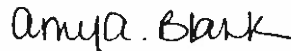
Firearm noise suppressors can effectively and consistently reduce noise levels at the shooter's ear by approximately 7-32 decibels (dB) depending on several factors including firearm type, barrel length of the firearm, type of ammunition, and measurement location¹. For a given measurement condition, a suppressor will reduce the noise approximately the same amount each time the gun is fired. Although firearm suppressors do not completely eliminate the risk of NIHL from firearm noise, the risk can be significantly reduced. Please see enclosure 1 *NHCA Position Statement: Recreational Firearm Noise* developed by the Task Force on Prevention of Noise-Induced Hearing Loss from Firearm Noise and approved by the NHCA Executive Council on March 16, 2017.

¹ Lobarinas E, Scott R., Spankovich C, Le Prell CG. [2016] Differential effects of suppressors on hazardous sound pressure levels generated by AR-15 rifles: Considerations for recreational shooters, law enforcement, and the military, *Int. J. Audiology*. 55 Supp1: S59-S71.

Persons wearing conventional hearing protection are not without risk of NIHL when using firearms. The noise reduction of hearing protection devices varies considerably across users and may provide significantly less protection from noise than the labeled noise reduction rating (NRR) suggests. The National Institute of Occupational Safety and Health (NIOSH) has recommended the NRR of conventional hearing protection be derated by 25% for earmuffs, 50% for formable earplugs, and 70% for all other earplugs to correspond to existing real-world data². NIOSH research has demonstrated that as many as 50% of persons using earplugs fail to achieve 25 dB of noise reduction for their earplugs³. However, using conventional hearing protection in conjunction with a suppressor can significantly reduce the risk of NIHL more than using either device alone.

The mission of the NHCA is to prevent hearing loss due to noise and other environmental factors in all sectors of society. Therefore, NHCA supports the use of firearm noise suppressors as a form of an engineering noise control to reduce hazardous firearm noise exposures. Because suppressors can be an important hearing conservation tool in preventing NIHL in firearm users, the NHCA supports passage of the Hearing Protection Act bills.

Respectively,



Amy A. Blank

NHCA President

² NIOSH, [1998] Criteria for a Recommended Standard for Occupational Noise Exposure Revised Criteria 1998, DHHS (NIOSH) Publication No. 98-126.

³ Murphy WJ, Themann CL, Murata TK, [2016]. Hearing protector fit testing with off-shore oil rig inspectors in Louisiana and Texas, Int. J. Audiology. 55(11): 688-698.