

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

From: Tom Francis [vkng7@yahoo.ca]
Sent: Monday, March 28, 2011 6:18 AM
To: NIOSH Docket Office (CDC)
Cc: vkng7@yahoo.ca
Subject: Docket # 221

As a retired member of the fire service I take this opportunity to add my voice for public comment in relation to the upcoming meeting and discussions regarding updating of 42 CFR Part 84.

After review of the present regulation it is my qualified opinion that in today's environment of fiscal restraint and responsibility, that Fire Departments be afforded the right to determine which make of manufacturer's air cylinder best fits their individual requirements and affordability.

The present regulation restricts the right of choice due to the unclear wording now provided. It is my opinion that the regulation be amended or changed so that the vessel used can be from any bona fide cylinder manufacturer provided it is a D.O.T. approved component.

To the best of my knowledge no respirator manufacturer at present make their own cylinders and in fact have probably used competing manufacturer's cylinders from time to time dependent on bid costs.

Presently the regulation indicates that respirator approval is granted to the complete assembly including the make of cylinder used at time of approval. This in my opinion is restrictive and removes choice and the customer's right of purchasing a replacement D.O.T approved cylinder of equal or better quality at advantageous pricing.

Thank you for the opportunity to comment.

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