

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

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**From:** Darryl Anderson [danderson@ci.bellaire.tx.us]  
**Sent:** Tuesday, March 29, 2011 6:10 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** Docket NIOSH-221

As a fire chief of a small department with a tight budget, I'm asking that NIOSH consider a test of an assemble for SCBA that DOES NOT include the Cylinder. I have the ability to purchase fully compliant composite bottles that are not part of an assembly for a better price than the manufacturer. This gives me the opportunity to provide greater value for my tax payers and provide more tested bottles with a longer life to my fire fighters. Good for all, except the OEM for the air pack, who buys the bottles off shore and tests it as a complete unit, keeping the increased cost as profit. The OEM doesn't provide a better product, as far as a bottle is concerted, only a tested assembly.

A short time ago, the fire service was moving to a point where all bottles could be comfortably and safely interchanged in any air pack. I don't understand why this failed but it was a good idea and should be revisited. It is the equivalent to interoperability for the radios used on the fire ground, something being forced by the FCC.

Please consider a revamp to 42CFR Part 48, and give me a choice.

Respectfully,

Darryl Anderson, Chief  
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