

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

From: richiefd@aol.com
Sent: Tuesday, March 29, 2011 8:45 AM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 221 - NIOSH Regulatory Agenda for updating 42 CFR Part 84 Comments

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Comments

I have been observing the discourse between SCBA manufacturers and the manufacturers that sell the air bottles to those manufacturers. I am fully aware of the challenges associated with voiding NIOSH certifications and expect that you would be very cautious about opening this door allowing waivers in certain instances.

Having said that I believe this is one exception of the rule that is warranted. The cost increases passed onto the end users of the SCBA's has become astronomical. My understanding that these air bottle manufacturerers have for many years been providing this product to the SCBA manufacturers.

For some reason the air bottle manufactuers want to sell direct to the end users and I think that is a tremendous savings particularly in this economy to allow that to occur.

The only caveat is to insure that the health & safety of the end users is not compromised in any way. If the air bottles are identical to what was previously sold to the SCBA manufacturers and is now being offered to the end users I strongly urge you to allow this waiver to occur in this particular instance.

I represent over 3,000 career firefighters in New Jersey, I am a NJ State Fire Commissioner, I also chair Firefighter Safety & Health for the NJ Fire Commission and i am also the Fire Chief in Hoboken, NJ. I strongly urge you to allow these air bottle manufacturers to sell these bottles directly to the end users for their use on SCBA units they have purchased from the respective manufacturers.

The safety of the firefighters should be paramount and I see nothing here other then a profit issue which i strongly urge you to disregard and allow these bottles to interface with SCBA's purchased elsewhere.