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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

This is an outdated regulation that needs to be updated. In the era of tight budgets, local government needs the ability to purchase the best equipment at the best price. The current regulations prevents this by forcing purchases from one manufacturer.

Right now, Scott is making a big deal out of the NIOSH certification. They say you must by cylinders from then to maintain this certification. What they are not saying is that they use cylinders from different manufacturers. My question to you is simple; if I purchase a complete SCBA from Scott and it comes with a cylinder manufactured by SCI, and five years later I purchase another complete SCBA from Scott with a cylinder from Luxfor, how can I mix and match these cylinders with the rest of the SCBA and maintain NIOSH certification? Is it because Scott says it's ok? How do I know that these two units are tested the same way?

Scott is using this regulation to prevent competition and keep prices artificially high. This regulation needs to be changed now, to allow local government the ability to purchase the best equipment at the best prices to protect our firefighters and citizens.