

Miller, Diane M. (CDC/NIOSH/EID)

From: Tony Watson [twatson@cityofpigeonforge.com]
Sent: Sunday, March 13, 2011 4:08 PM
To: NIOSH Docket Office (CDC)
Subject: NIOSH Docket #221
Attachments: NIOSH SCBA.doc

NIOSH Docket Office,

The attached document expresses my support for rule making changes to the NIOSH Standard Application Process & CFR 42. Thank you for your time in reading the document on such a very important matter.

Respectfully,



Tony L. Watson, M.A.Ed.,
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City of Pigeon Forge Fire Department

Tony L. Watson, Chief



NIOSH Docket Office
Robert A. Taft Laboratories
4676 Columbia Parkway
Cincinnati, OH 45226

Dear NIOSH Docket officer,

I'm writing to express my support for rule making changes to the National Institute for Occupational Safety & Health (NIOSH) Standard Application Process (SAP) & CFR 42 part 84 allowing SCBA cylinders and valves to be approved separately from the SCBA ensemble. Further, we request that the utilization of CFR 42 part 84, subpart H84.81 & H84.84 be sufficient when making purchases of spare & replacement cylinders. In doing so, the SCBA ensemble shall remain in a NIOSH approved configuration.

Estimates reveal that these changes would save North American first responders \$50 to \$100 million annually. This savings would allow Emergency Service Organizations to more adequately fund other important initiatives. NIOSH would better serve their constituents by developing changes that allows for this initiative to become a reality.

We support guidelines that provide for first responder safety; however current guidelines prohibit fair and open competition for replacement cylinders benefiting a few SCBA manufacturers at a significant cost to First Responders, without improving safety. NIOSH should take immediate steps that allow for NIOSH approvals to remain in effect when First Responders purchase Cylinders & Valves that meet CFR 42 part 84 subpart 84.81 & 84.82.

We believe the current NIOSH guidelines pertaining to SCBA cylinders is outdated and in need of immediate revision. We strongly urge NIOSH to take immediate steps to develop an updated and more appropriate approval process in this area.

Sincerely,

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