

**Dragon, Karen E.**

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**From:** Moses, Samuel A.  
**Sent:** Tuesday, April 26, 2005 7:59 PM  
**To:** NIOSH Docket Office; 'timetoexit@local67.com'  
**Subject:** SCBA ESLI Docket # NIOSH-034

April 26, 2005

NIOSH Docket Office  
Robert A. Taft Laboratories  
Mail Stop C-34  
4676 Columbia Parkway  
Cincinnati, OH

Dear Docket Officer:

I am writing in support of the proposed change to 42 CFR part 84 (Docket # NIOSH-034) to remove the upper limit of alarm from the remaining service life indicator (RSLI) of self-contained breathing apparatus (SCBA) as indicated in section 84.83(f) of the current regulation. If necessary, this change may be limited to fire service users of SCBA.

The current RSLI requirement was put in place over 45 years ago and does not meet current needs or realities. Over the years, major changes have taken place in firefighting strategy, tactics, building construction and layout, and the technology of today's firefighting personal protective equipment. As a result of these changes, firefighters are going deeper into structures than ever before, while the time allotted for exit has remained static. The result is an exit time crisis for the fire service.

A 2002 study by the U.S. Fire Administration analyzed firefighter fatalities over the ten-year period from 1990-2000, it concluded that 'lost, trapped, and disoriented' was the second leading cause of firefighter fatalities for that period. In addition, firefighters today are more than twice as likely to be killed in a non-residential structure as compared to a residential structure. It is these larger and more complex structures that pose the greatest risk to today's firefighters. In fact, the rate of non-cardiac firefighter death inside of structures is nearly double that of 25 years ago. Firefighters need more time to exit or be rescued from the modern fire environment.

As a result of the current regulation imposing an upper limit of alarm, fire departments must choose between giving their firefighters more exit time through larger cylinders with the risks associated with additional time in the hazard zone or a reasonable work period with insufficient exit time. This is not an acceptable choice.

Adoption of this change to 42 CFR part 84 will allow the fire service to better determine its real needs regarding exit time without further jeopardizing firefighter safety with increased work stress, heat stress, depth of entry, and structural degradation. This would be achieved while still providing a minimum standard for the RSLI.

Thank you for considering my comments.

Sincerely,  
Samuel A. Moses  
Fire Engineer