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Sent: Saturday, April 30, 2005 11:10 PM
To: NIOSH Docket Office; timetoexit@local67.com
Subject: SCBA ESLI Docket

With the exit time problem being so serious, the obvious and simple solution would be to simply adjust the low air alarm upwards to provide a greater margin of safety. The problem is, federal regulation prohibits an SCBA's low air alarm (remaining service life indicator) from notifying the user prior to 25%.

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

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.

Jon Harvey

President IAFF Local 336