

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

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**Sent:** Wednesday, February 11, 2009 2:52 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 141 - FFUS Comments

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**Comments**  
Your current document is ridiculous!

Your statement that no offensive interior attacks should be made in unoccupied structures, even in current use, is one step away from saying don't respond.

I'm retired from the Detroit Fire Department and fought thousands of fires in unoccupied and vacant structures without injury. It can be done!

Although well intentioned, your Alert is making a fire ground decision without consideration of the location and extent of fire, the building construction and contents, and a vast number of other considerations.

My house contains a pet, important life documents, memoirs, and other possessions. If the fire department responded to a room fire I would expect them to provide for an offensive attack and save those possessions not involved in fire.

As a fire chief I commanded a fire in a large mansion built in the 20's. It was a difficult fire because of balloon construction but we kept the fire damage to one-half of the structure. The next day I returned to the site with the owners who were more than happy that the area that contain their memoirs and keepsakes was still in tact, although smoke damaged. We were able to save these people possessions that were a very much part of their life - without any injury!!

The draft Alert and any subsequent drafts should not concentrate on making decisions on the fire ground. What needs to be addressed is the training of firefighters, and especially incident commanders, in assessing an incident, conducting a risk/benefit analysis, instituting a sensible level of aggressive attack and maintaining a good organizational structure (ICS).

The Alert needs to be modified by removing the comments regarding not attacking fires in unoccupied structures.

You would be very irritated if you had a one room or two room fire in your house and the fire department took a defensive position that caused your house to burn down. Provide guidance, not operational decisions!