

Dragon, Karen E. (CDC/NIOSH/EID)

From: DeRosa, Louis [derosal@mfd.rosenet.org]
Sent: Wednesday, March 16, 2011 11:48 AM
To: NIOSH Docket Office (CDC)
Cc: DeRosa, Louis
Subject: docket #221

To whom it may concern;

I am writhing to you regarding Docket #221 and to ask that NIOSH eliminate the cylinder from the "Ensemble Approval" process for fire service SCBA. Presently all cylinders used for any manufactured and approved SCBA are designed and built to a minimum standard. They can not be used unless they are DOT approved. That being said it makes no sense to only allow an approved DOT cylinder to be used that has been tested, approved and LABELED with the SCBA's manufacturers name on it. What is next, that only "energizer" batteries can be used and not "Duracell"?

NIOSH should provide a "Separate Cylinder Approval" which would allow users to choose cylinders from more than a single source. They cost of a cylinder without a SCBA manufacturer's name is considerably less than one with. That is the only difference. The cylinder is DOT approved for use in the fire service. Elimination of the cylinder from the ensemble approval would save Fire departments millions of dollars annually which could be better used for adequate staffing and other department needs.

I am hoping that "common sense" will prevail here, as safety is not being compromised. With this proposed change, only a saving of dollars to the already financially strapped fire departments would be the impact.

I thank you taking the time to review this.

Sincerely,

Chief Lou DeRosa
Madison Fire Department
Fire Subcode Official
973-593-3068