

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

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Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 221 - NIOSH Regulatory Agenda for updating 42 CFR Part 84 Comments

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Comments

THESE COMMENTS ARE MY PERSONAL OPINION AND DO NOT REPRESENT THE OPINIONS OF MY EMPLOYERS. As a contract negotiator for a large defense business and company officer/instructor in my department, it make sense to me that our equipment be certified by an independent agency like NIOSH, DOT, or ISO. What does not make sense is the requirement for the entire ensemble to be specifically certified together. As a certified scuba diver, I can choose one of several different manufacturer's regulators and tanks, both of which are certified individually and work together. Consequently, I see no reason to not separately certify air tanks for our SCBAs. It would increase competition and significantly reduce the expense of replacement tanks for fire departments nationwide.