

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

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**From:** jspicuzza@ionafire.com  
**Sent:** Tuesday, December 02, 2008 2:58 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR); Doyle, Glenn (CDC/NIOSH/EID)  
**Subject:** 063-A - FFFIPP Comments

**Name**

John Spicuzza

**Organization**

Iona-McGregor Fire District

**Email**

jspicuzza@ionafire.com

**Address**

6061 South Pointe Blvd.  
Ft. Myers, FL 33919  
US

**Comments**

After writing a research paper for the National Fire Academy's Executive Fire Officer (EFO) program concerning issues involving personnel in a temporary "acting" or "move-up" position, I found anecdotal evidence that a high number of LODD reports stated there were "Acting Company Officers" on scene or making decisions.

After contacting NIOSH it was learned that this is not a field required to be inquired about on your investigations. If the notion that someone was in an acting position was mentioned during the investigation, it was written in the report. If it was not mentioned it was overlooked. We may not know how often this may be an issue if it is not consistently tracked.

I am recommending that a required question to be asked during an investigation is whether anyone was in an "acting" or "move-up" position of Pump Operator, Company Officer, or Chief Officer when a LODD occurred and if they had the minimum qualifications of that role. It would be worth evaluating any trends that may come out of the data over time.

Thank-you for the opportunity to have input.

John