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Mr. Daniel Rossos, Chairman
Technical Committee on Respiratory Protection Equipment
National Fire Protection Association
Protective Clothing and Equipment
1 Batterymarch Park
Quincy, MA 02169

Dear Mr. Rossos:

I am writing to provide the National Fire Protection Association (NFPA) with an update of The National Institute for Occupational Safety and Health (NIOSH), policy intentions regarding "Buddy Breathing".

We are reevaluating our policy letter dated November 6, 1984, *Subject: Notice to all respirator manufacturers with MSHA/NIOSH Approved Respirators*. That letter stated:

"The use of any component, connected, interfaced, or assembled in combination with MSHA/NIOSH certified self-contained breathing apparatus (SCBA) for use as an emergency escape support breathing system or "Buddy Breather" to allow more than one individual access to the apparatus' life support system(s) either directly or indirectly, automatically voids the applicable certification during its use. Such invalidation continues in effect until the SCBA is returned to the certified status through required maintenance, test checkout, and reassembly as prescribed by the manufacturer's instruction manual and any other applicable user company policy/rules, legislative directives or enforceable regulations applicable to user health and safety.

Respirator manufacturers must not state in advertising or instructional literature, that use of such components is approved by MSHA/NIOSH."

As a part of the reevaluation process, we opened a public docket in December 2010 and held a public meeting to solicit stakeholder. You can view the comments that were submitted to the docket at our Internet website: <http://www.cdc.gov/niosh/docket/archive/docket147.html>.

After we reviewed the submissions to the docket and the applicable OSHA standards, we now think that the existing policy should be modified to permit approved use of emergency escape support breathing systems (EESBS) or “Buddy Breathers.” Our approval of these practices including EESBS within the framework of NIOSH certification including allows the Fire Service to formally incorporate “Buddy Breathing” training programs conforming to NFPA Standards 1404, *Fire Service Respiratory Protection Training* and 1500, *Fire Department Occupational Safety and Health Program*, which would address appropriate cautions and limitations associated with the use of EESBS.

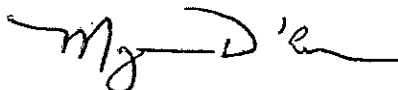
We plan to revise the NIOSH policy to include EESBS systems within the scope of the approval consistent with the proposed changes in the NFPA 1981 standard, 2013 edition. This policy change will apply only to apparatus that both comply with the requirements of NFPA 1981, 2013 edition, and future NFPA 1981 editions and are used in accordance with the Occupational Safety and Health Program requirements of NFPA 1500 and the personnel training requirements of NFPA 1404. Products currently approved and equipped with Buddy Breathers will not be in NIOSH-approved condition if Buddy Breathers are used.

We will move forward with developing appropriate requirements and test procedures to evaluate EESBS prior to the projected implementation date of the NFPA 1981 standard, 2013 edition. We have concerns regarding how users will distinguish previously approved products from products approved under the new policy. We will work with NFPA, SEI, ISEA and other stakeholders to identify appropriate marking or labeling that distinguishes between approved and non-approved apparatus configurations. We look-forward to working with the NFPA to identify an appropriate identification mechanism. We plan to use a publicly accessible, transparent process to develop the new evaluation protocols and test procedures.

We anticipate convening a public meeting in 2012 that will include a focused discussion of incorporation of components of EESBS into the NIOSH respirator approval process.

The point of contact for this topic is Heinz Ahlers at 412-386-5132.

Sincerely,



Maryann D'Alessandro

Director

National Personal Protective Technology Laboratory

cc: Mr. William Haskell