

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

From: David Spears [dspears@safeairsystems.com]
Sent: Wednesday, March 30, 2011 11:47 AM
To: NIOSH Docket Office (CDC)
Cc: David Spears
Subject: 42 CFR Part 84 Comment

Dear Sir,

With regard to updating the Federal Code, specifically 42 CFR Part 84, Safe Air Systems, Inc. respectfully requests that the current ruling, requiring that the Department of Transportation (DOT) cylinder and Self-Contained Breathing Apparatus (SCBA) be approved together as a unit, be eliminated. Safe Air Systems, Inc. has been serving the fire service community for over twenty years, providing quality breathing air systems and related programs. Safe Air Systems, Inc. is currently a "Cylinder Requalifier" as defined in 49 CFR Part 180, and operates under RIN D762. Without a doubt the safety record associated with high pressure cylinders, like those used in SCBA, is due largely to the stringent guidelines established for manufactures of cylinders and for requalifiers, such as Safe Air Systems, Inc. by the DOT.

Regulation in this industry is extremely important. The link between safety and regulation has produced an unrivaled record of performance and cannot be overshadowed. The request to review and amend the current NIOSH approval would in no way compromise the safety of the responder or the citizens they serve. Regardless of debate, the Department of Transportation, is among the most powerful and influential government agencies in our nation. With regard to cylinder safety, DOT's rigid standards have served the industry well and alone should be sufficient to continue the current level of cylinder performance without compromise.

Sincerely,

David Spears

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