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**From:** NIOSH-Regulatory-Agenda-for-updating-42-CFR-Part-84-Comments  
**Sent:** Monday, March 21, 2011 8:54 AM  
**To:** NIOSH Docket Office (CDC)  
**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**

Without going into a very long explanation of why NIOSH needs to change 42 CRF Part 84 to bring a much needed Budget Relief and Operational Control improvement to North American First Responders by allowing for separate approval of SCBA cylinders. I will simply state there are huge financial impacts:

**Financial impacts:**

- â€¢ Fire Departments pay excessively high prices for spare & replacement SCBA cylinders from respirator manufacturers â€œ yet receive no added benefits
- â€¢ Current system negatively impacts Fire Departments & End User budgets
- â€¢ Municipalities and other governments budgets are negatively affected

I see NIOSH resolving this by doing two things:

- 1 NIOSH should provide a â€œSeparate Cylinder Approvalâ€ which would allow users to choose cylinders from more than a single source
- 2 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 This does not have a Safety impact because cylinders are already federally regulated by the USDOT & Transport Canada !