

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

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**From:** dbardonnex@courtenay.ca  
**Sent:** Wednesday, March 30, 2011 12:14 PM  
**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

Name

Donald A Bardonnex

Organization

Fire Chief City of Courtenay

Email

[dbardonnex@courtenay.ca](mailto:dbardonnex@courtenay.ca)

Address

650 Cumberland Rd.  
Courtenay, BC V9N2C8  
Canada

Comments

Since most SCBA manufactures do not produce the bottles on their units, doesn't it seem reasonable to extend the NIOSH certification to the manufactures that do.

Buy allowing emergency responders to purchase and utilize bottles direct, the cost saves to the taxpayer would be enormous.

Unless someone could explain to me how it is safer to buy the bottles from a retailer rather than the manufacture, I fail to see the issue.

1. NIOSH should provide a "Separate Cylinder Approval" 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

Thank you for your time