

GOOD AFTERNOON -- MY NAME IS ROGER A. MCGARY, FIRST VICE PRESIDENT OF THE INTERNATIONAL SOCIETY OF FIRE SERVICE INSTRUCTORS, REPRESENTING THAT ORGANIZATION AT THIS PUBLIC MEETING. I AM EMPLOYED AS FIRE CHIEF OF THE TAKOMA PARK, MARYLAND V. F. D., INC. AND HAVE SPENT 24 YEARS IN THE FIRE SERVICE, 15 OF THOSE YEARS IN PARALLELLING INDUSTRIAL FIRE PROTECTION POSITIONS, THE LAST NINE AS FIRE CHIEF AND FIRE PROTECTION ENGINEER FOR MERCK & CO. INC. IN RAHWAY, NEW JERSEY.

ALTHOUGH REPRESENTING THE SOCIETY AT THIS SESSION MY COMMENTS REFLECT MY PERSONAL OBSERVATIONS AND, I'M SURE, SOME OF THOSE OF MY FELLOW SOCIETY MEMBERS.

WE, IN THE INSTRUCTOR'S SOCIETY, HAVE A VESTED INTEREST IN THE WELFARE OF THOSE USING RESPIRATORY EQUIPMENT, IN PARTICULAR THE FIRE FIGHTER. IN THE LAST FEW YEARS WE HAVE READ OF THE NUMBER OF FIRE FIGHTERS WHO HAVE DIED IN THE LINE OF DUTY, IN PARTICULAR - WITH ALARM - THOSE WHO HAVE SUCCUMBED WHILE WEARING BREATHING APPARATUS.

RELATIONSHIPS BETWEEN FIELD MAINTENANCE AND THE CERTIFICATION PROCESS AS COMPLETED BY NIOSH/MSHA SHOULD HAVE TIES THAT WILL HELP ELIMINATE INJURIES AND FATALITIES IN THE FIELD. UNFORTUNATELY, THERE APPEARS TO BE LITTLE PREVENTATIVE CONCERNS FROM NIOSH UNTIL AND WE EMPHASIZE UNTIL AN INCIDENT OCCURS.

WE FURTHER RECOGNIZE THAT YOU MIGHT BE QUICK TO STATE THAT MAINTENANCE AND TRAINING HAVE FAILED, OR WE MIGHT HAVE ELIMINATED THESE INJURY/FATALITY PRODUCING SCENARIOS ... WE AS THE PREDOMINANT FIRE SERVICE ORGANIZATION WITH AN INTEREST IN THE TRAINING (INCLUDING MAINTENANCE) FIELDS WHOLE HEARTEDLY AGREE WITH YOU ... THERE IS A LACK OF TRAINING AND MAINTENANCE IN THE FIELD AND THAT'S ONE OF OUR OBJECTIVES ... I.E., TO IMPROVE THOSE AREAS BY WAY OF OUR SEMINAR SERIES OF BREATHING APPARATUS AND RESPIRATORY AIR AS WELL AS THROUGH WORKSHOPS PROVIDED AT THE ANNUAL SOCIETY MEETINGS HELD IN THE SPRING IN MEMPHIS, TENNESSEE (FIRE DEPARTMENT INSTRUCTORS CONFERENCE) AND IN THE FALL AT VARIOUS COMMUNITIES THROUGHOUT THE NATION.

THIS SPEAKER'S EXPERTISE IS NOT IN THE CERTIFICATION CRITERIA, THEREFORE IT'S DIFFICULT TO SECOND GUESS THE STATEMENTS PLACED IN THE FEDERAL REGISTER ANNOUNCEMENT OF WEDNESDAY, JUNE 18, 1980. WE URGE YOU TO CONSIDER THOSE FACTORS THAT WILL HELP ELIMINATE THE POTENTIALS FOR INJURY AND FATALITY OF THE USERS OF RESPIRATORY PROTECTIVE DEVICES.

WE, AS INSTRUCTORS, WHOLEHEARTEDLY SUPPORT THE CONCEPT OF PERFORMANCE SPECIFICATIONS .. WE ADVOCATE BEHAVIORAL OBJECTIVES IN TRAINING AND, IN MY OPINION, PERFORMANCE SPECIFICATIONS WILL PROVIDE A SIMILAR CONCEPT.

WE SUPPORT THE AUDITING OF EQUIPMENT IN USE, BUT CAUTION THAT THE AUDIT MUST ALSO CONSIDER THE MAINTENANCE PROGRAM USED BY THE USER. RESPIRATORY EQUIPMENT WILL, IN MOST CASES, PERFORM AS SPECIFIED, BUT THE KEY FACTOR WILL BE THE FIELD MAINTENANCE, IN MANY CASES POORLY DONE IF DONE AT ALL.

IN YOUR COMMENTS RELATED TO TESTING OF PROTOTYPE RESPIRATORS ... I HAVE SOME CONCERNS IN THIS AREA AND THAT BEING FOR THE MANUFACTURER WHO DEVELOPS A NEW PROCESS... ONE NOT PRESENTLY USED BY A MANUFACTURER ... WHERE DOES HE FIT IN? HE MAY WELL HAVE A PRODUCT THAT WOULD REVOLUTIONIZE THE BREATHING APPARATUS FIELD, BUT WITH A LACK OF ABILITY TO INTRODUCE IT TO YOU FOR CERTIFICATION OR TESTING AS A PROTOTYPE, IT MAY NEVER REACH THE POTENTIAL USER. FURTHER, WE MIGHT ASK, WHAT PROVISIONS ARE BEING MADE TO ENABLE A MANUFACTURER TO DEVELOP THE NEW CONCEPT? IS THERE A TESTING FIELD FOR HIM?

AS I NOTED A FEW MINUTES AGO I DO NOT CONSIDER MYSELF THE EXPERT IN THE TESTING AND CERTIFICATION FIELD, BUT AS AN END USER I LOOK AT THE ABILITY TO USE THE EQUIPMENT, MAINTAIN IT AND HAVE OPTIMUM PERFORMANCE FOR THE FIRE FIGHTER ... HOPEFULLY, WHATEVER REVISIONS ARE MADE TO YOUR TESTING AND CERTIFICATION PROCEDURES WILL ALSO PROVIDE THE OPTIMUM IN MANUFACTURER'S PERFORMANCE THAT WILL BE REFLECTED IN THE END USER'S ACTIVITIES.