

**Miller, Diane M. (CDC/NIOSH/EID)**

---

**From:** hullingerp@troymi.gov  
**Sent:** Tuesday, January 25, 2011 2:09 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 147 - Reevaluation of the NIOSH policy on emergency escape support breathing system or buddy-breather device used with open-circuit self-contained breathing apparatus Comments

**Name**  
Peter Hullinger

**Organization**  
Troy Fire Dept

**Email**  
[hullingerp@troymi.gov](mailto:hullingerp@troymi.gov)

**Address**  
500 W. Big Beaver Rd  
Troy, MI 48084  
USA

**Comments**

For the safety of all emergency personnel NIOSH need to eliminate the 1984 prohibition on buddy breathing. The changes in technology have increased the efficiency and safety of using a buddy breathing device. Exposure to IDLH is eliminated and allows for rescue options that other systems do not offer. NIOSH approval of a buddy breathing system will initiate NFPA testing procedures, training and operational use standards.

We have had EBSS on our packs for many years. We train on the use of the EBSS extensively every year with hopes that it will never be needed but having this small assurance makes a world of difference when having air is your only option.

LT. Hullinger  
Troy FD