

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

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**From:** mdaski@aol.com  
**Sent:** Tuesday, March 29, 2011 10:55 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

As you know, the entire country is encountering a huge financial difficulty. All emergency departments are desperately seeking ways to reduce expenses. With that being said, some consideration should be made to allow "equal or greater than" components to be used in conjunction with NIOSH approved SCBA units; specifically the pressurized cylinders. Luxfer and SCI have been manufacturing cylinders for the fire service and industry for years and are components of approved SCBA. However they are not allowed to be used independently of the SCBA as a replacement part, unless they are purchased through the SCBA manufacturer. The same cylinder from the SCBA manufacturer is 40-50% more expensive for the identical cylinder. I realize that the SCBA is tested and approved as a unit, and therefore the cylinder must be a component of the unit, but realistically the cylinder directly from Luxfer and SCI is in fact "equal or greater than" the SCBA manufacturer cylinder. The significant cost savings would allow department to better utilize those funds to provide service to the community. Again, we respectfully request that you please make every consideration to allow these cylinders to be used within a NIOSH approved SBCA. Thank You.