

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

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**From:** fwindisch@ponderosavfd.org  
**Sent:** Friday, October 16, 2009 7:09 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 083-B - Supplied Air Respirators (SAR) Comments

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**Comments**  
regarding 42 CFR Part 84 Subpart J

As an overview, the supplied air cylinder and valve have nothing to do with respiratory air controls. DOT regulates the cylinder, NIOSH should be regulating the air distribution components, reliability and performance. I see no reason to have an SCBA manufacturer retest their product just because another brand of DOT certified cylinder is used. It is merely the air supply.

As a customer/user view, we have manufacturers that can "monopolize" and set overly high prices for ONE generic component. While I understand that manufacturers can have specific relationships with suppliers, there comes a time when the monopoly effect is evident, and that's where we are now. The price differential is approximately 50% when comparing one SCBA cylinder brand to another via the SCBA manufacturer/NIOSH rules.

What if another cylinder manufacturer develops an improved cylinder that is more durable, meets all DOT requirements, lighter, and is less costly?  
WE have no choice but to buy the brand that the SCBA manufacturer allows, therefore the higher costs and the removal of quality and performance improvements from a component that has nothing to do with SCBA performance.

As per NIOSH (and manufacturers) interoperability of various cylinders is prohibited. If fire department A and B are working together (and we do on a daily basis), and department A & B use different "cylinders", then we cannot utilize these two different brand products (scarce resources) during an emergency. The fire scene is controlled chaos, and we must have the flexibility to use AIR, no matter what brand name is on the cylinder.

As a fire chief who deals with scarce resources every hour of every day, I find it very difficult to understand why this issue is in its current state. It seems so simple to me that if a qualified cylinder works by removing one and replacing with another, then why CAN'T a realistic view be obtained versus "can't" because we said so....

Thank you,