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To: NIOSH Docket Office (CDC)

Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)

Subject: 141 - FFUS Comments

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Comments

The intent of this NIOSH alert seems to be well intentioned but poorly thought out and poorly written. There seems to be several assumptions and a blurring of the different intents.

It appears that the assumption is that all "offensive" operations are aggresive in nature and inferred to be recless and all "defensive"

operations are safe. Neither of these are true in every case and safety can be dictated more by training and discipline than, are we operating inside or outside the structure.

There seems to be a direct assumption that all "unoccupied" structures are vacant, abandoned and unsafe.

Is an occupancy vacant if the neighbors report that they saw the neighbors care leave an hour prior to the fire being reported? The report seems to indicate so, and if so then NO offensive operations should occur. Yes, that's how I read it. Even if it is a room and contents fire? In some situations it is hard to tell without looking at the interior conditions.

I genuinely hope that the neighbors did not go out and leave their 13 year old child at home. You've written them off and they may be inside the front room overcome by smoke. Great job. It happens, five children perished in a house filled with smoke in 1982 in Upper Arlington. This occured while the parents attended Christmas Church service. No cars around and people saw them leave for church. NO one home, I don't think so.

This is an attempt to make a blanket rule and do away with need to understand fire conditions and when a fire in a structure has made it unsafe. If there is a bedroom fire and there may be no one waving at a window, does everyone stay outside and wait for it to burn through the roof so a master stream can put water on it? Sound like that is the intent of this report.

NIOSH should stress fire service trainig, getting out and identifying "unsafe structures" and accurately identifying them prior to a fire occuring. I have seen plenty of unsafe but occuppied structures we should also take them into account.

Blanket statements like this report may harm the firefighters in thier ability to secure training and resources more than any manageble fire in an unoccupied structure.