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

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Sent: Saturday, January 29, 2011 1:09 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

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Comments

This is a critical time in the fire service with LODD continuing to hover around the 100 mark each year. The use of buddy breathing in the fire service has been around since the SCBA was developed. Take the opportunity NOW to review buddy breathing and regulate it. An emphasis should be placed on making buddy breathing, NOT TRANS-FILL, interoperable among manufacturers. In addition, the buddy breathing system should be regulated and tested according to a common NIOSH standard to make sure each and every firefighter in the USA can buddy breath with another firefighter regardless of the manufacturer of their SCBA.

Finally, the standards require that we place a SCBA cylinder in an explosion proof container when filling it. Why then would trans-fill be acceptable under hostile conditions while the SCBA is on a user's back?

Makes no sense.

Take the universal RIC connection that is simply a trans-fill out of the standard and replace it with a mandatory buddy breathing standard that has common connections among all manufacturers.

Sincerely,
David Carter
Battalion Chief
Ft. Lauderdale Fire Rescue