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

From:

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Sent:

Thursday, March 31, 2011 12:14 PM

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

Name

Stevan M. Moyer

Organization

Earl Twp. Volunteer Fire Co. #1

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Comments

RE:42 CFR Part 84 Update

To Whom It May Concern,

As a 40 year veteran of the fire service and serving in every position including Chief for 13 years I believe that we need to end the "monopoly"

that your organization has placed on the Fire Service. We may certainly buy any brand of SCBA we feel the best but for replacement and spare cylinders we are locked in to purchasing brand specific there-by creating the "monopoly". It is ironic that the cylinders sold by these SCBA Companies are not manufactured by them but are out sourced. If you are at the scene of a multi alarm fire you may wear anyones air cylinder as long as the proper pressure cylinder is used. Most are interchangeable and are intermingled. My station has replaced our SCBA and maintained a supply spare cylinders by the previous manufacturer.

I believe that your testing is on the SCBA and has nothing to do with the cylinder. The necessity to allow for a seperate cylinder standard has arrived. The time has come to release the Fire Service to purchase what is needed and save their hard earned money. Please concider the changes that have been placed before you in favor of Firefighters across this nation.

In closing please do the right thing and pass a separate standard for the SCBA Cylinders.