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To:

NIOSH Docket Office (CDC)

Cc:

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141 - FFUS Comments

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While it sounds like an easy task to understand and to implement, the language dictating that no interior operations should take place in an unoccupied or unsafe structure needs to be removed. The only methodology available to Fire Departments is to ensure that a structure is unoccupied is by placing firefighters into the structure to conduct a search. While no building or any other property is worth the life of a firefighter, the primary job function of a firefighter is to find and remove trapped or injuried individuals.

If this 'Alert' is published as is, too many people that do not understand the needed fireground operations, specifically risk managers and liability avoidance staff, non-firefighting personnel will place hundreds of lives at risk by preventing interior firefighting. The way to minimize firefighter injury and death within interior operations is a basic three-prong approach that has been lost within the fire service: 1) Appropriate and realistic training in fire ground activities, 2) appropriate and job specific physical fitness standards and training, and

3) development and enforcement of sound building construction practices.