

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

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**To:** NIOSH Docket Office (CDC)  
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**Subject:** 141 - FFUS Comments

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**Comments**

There is an abundance of good information in this document about preventing firefighter deaths. I have been a career firefighter for 25 years and a district major (fireground commander) for 12 years. I believe in the risk a lot to save a lot statements. In the four cases cited, however, cases one and four appeared from the synopsis to have been more a result of failure to recognize fire conditions. Cases 2 and 3 appear to have more to do with maintaining crew integrity and searching without a line to the outside. I know that there are other factors. Also, in the study cited where 75% of the fatalities were in unoccupied structures, 75% of the structures in the study were unoccupied. This does not seem to support the theory.

My only issue with this document is that two times it is said not to go offensive in any unoccupied or unsafe structure. I firmly agree that we need to stay out of unsafe structures. Just because a structure is unoccupied does not make it unsafe. I fear that some will interpret this recommendation and allow small easily extinguishable fires to be fought defensively just because they believe no one is home. Sometimes the safest thing to do is effectively extinguish the fire. I would suggest rewording the unsafe or unoccupied criteria statement.

I tried to keep this short.

This is my personal opinion, not that of the LFD.

Feel free to contact me for clarification or assistance.

Thank you