

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

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Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 221 - NIOSH Regulatory Agenda for updating 42 CFR Part 84 Comments

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Comments

The ability for an organization to have breadth of choice is paramount to firefighter safety and financial stability of departments. Without the ability to have competition in product it stifles technological advancement, product quality, and financial reason.

While governed by Other standards of safety (DOT, OSHA, NIOSH, etc...) there is no reason why a SCBA bottle, regardless of the manufacturer or final distributor, can not be used with other manufacturers of SCBA. The bottle itself is universal. As long as it meets pressure, deterioration, and wear standards, with what SCBA user it is used is completely irrelevant.

NIOSH should provide a separate cylinder approval