

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

From: chiefhac@aol.com
Sent: Wednesday, January 07, 2009 9:43 AM
To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 141 - FFUS Comments

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Comments
Dear Sir/Madam:

I am opposed to the proposed NIOSH Draft Document for Public Review:
Preventing Deaths and Injuries of Fire Fighters When Fighting Fires in Unoccupied Structures.

As I read the document I note many of the points pertain to how to safely operate at an incident in an unoccupied building and its' perimeter. Yet, the following paragraph, found on page 3 of the draft document, also appears in the draft, leading to confusion. It is to this paragraph that I address my comments.

"Develop and implement fire department policies and SOPs/SOGs for emergency response and fire-fighting activities in and around unoccupied structures. No offensive interior attacks should be made in unoccupied or unsafe structures."

NIOSH's definition of unoccupied doesn't mean vacant! Your definition, though not stated anywhere in the draft, means a building that at the time of the fire or other emergency is unoccupied, even though a viable residence, retail or commercial site, or whatever. Just at the time of the fire, it is unoccupied, and therefore there should be no offensive interior attack. This is a big difference from attacking a fire in a vacant or abandoned building.

What will the homeowners and building owners think about this? Their taxes are paying to have their lives and their property protected. What happens if you follow these guidelines and retail, manufacturing, and commercial establishments are destroyed by fire? There will be the loss of jobs with increased unemployment and a reduction in the communities tax base. Fire departments daily, across the country, make numerous successful offensive interior attacks, extinguishing and saving residential and commercial properties for their owners, thus enabling them to continue with their daily lives and occupations. Surround and drown tactics, as the draft seems to allude to, breed surround and drown communities!

The public continues to hold the fire service in high esteem based on their ethics, integrity, dedication to duty, and the ability to get the job done. Further, the public continues to believe that their local fire department is going to save them and their property whenever possible from fire or other peril. Until NIOSH or the fire service informs the public of the change in strategy, that the saving of property will no longer be part of the fire service game plan, we should continue to operate in the safest manner possible in our attempt to save property.

When and if a decision is made to inform the public that we will no longer attempt to save property, we

can shut the doors on the fire service in America!