

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

From: shayes@bullheadfire.org
Sent: Wednesday, March 30, 2011 4:02 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
Scott Hayes

Organization
Bullhead City Fire Department

Email
shayes@bullheadfire.org

Address
1230 Hwy 95
Bullhead City, Arizona 86429
USA

Comments

While dealing with the Budget declines we are faced with I feel that forcing Fire Departments to purchase SCBA Cylinders from e manufactures like MSA or Scott who "DO NOT" manufacture cylinders themselves is a great cost burden which is not necessary. The SCBA Cylinder manufactures already have to comply with all the regulatory entities. When we have to purchase them from the air pack manufacturer it eliminates competion and the Air Pack manufacturer can charge what ever they want above a competitive price because they know we have to purchase from them. Your current rule doe's not make for a competitive market, yet, if changed, it would allow us to purchase compliant SCBA Cylinders which would save us a great deal of money which we do not have to begin with. I personally have checked prices on SCBA Cylinders and have found a substantial savings but could not take advantage of this savings because of the current rule. PLEASE CHANGE THIS RULE, 42CFR PART 84, TO ALLOW ALL COMPANIES, BUSINESS'S, DEPARTMENT'S AND EVERYONE TO PURCHASE SCBA CYLINDERS FROM ANY SOURCE WHO IS MANUFACTURING THIS PRODUCT TO CURRENT SPECIFICATIONS AND REGULATIONS WHICH ARE IN PLACE FOR THEIR MANUFACTURING PROCEDURES. Thank You, Scott Hayes, PPE Technician