

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

From: Bennett, Stephen R Civ USAF PACAF 8 CES/CEF [stephen.bennett@kunsan.af.mil]
Sent: Wednesday, March 30, 2011 1:36 AM
To: NIOSH Docket Office (CDC)
Subject: Please Revise 42 CFR Part 84

Greetings,

Please revise 42 CFR Part 84 to allow for the interoperability of certain pieces of SCBA breathing apparatuses. In its current state, this regulation is unnecessarily restrictive and needlessly establishes a monopoly on the industry.

There is no legitimate reason to instead simply institute clear and precise guidance for certain individual parts themselves- as long as the particular part is simple enough to fabricate by a qualified artisan and as long as this guidance unambiguously leads to a single fully operational apparatus.

Particularly in the case of the pressurized tanks themselves. The fulfillment of a simple DOT specification is all that should ever be required- not a brand name. By enforcing the use of a brand name the market itself becomes lopsided and bereft of competition. This has a clearly negative impact by lowering standards of excellence and inflating costs.

Ultimately the ones who pay for it are the tax payers and the emergency responders. Both deserve better- especially with today's budgetary constraints across the board.

Very Respectfully,

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