

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

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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 141 - FFUS Comments

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Comments

I found you report an affront to the Fire Fighter Community and an incredible waste of Taxpayer dollars.

Doesn't NIOSH have more important things to do then to regurgitate fire fighting doctrine for dealing with fires in unoccupied structures?

What's the point? It 's a rhetorical question?

Your intention is to expand your power and authority. First your going to try and get away with dealing with this issue and not with the Fire Service as a whole -- foot in the door. Your using an issue that relative to the number of fires fought over the 9 year period - thousands - fought by thousands of fire fighters man hours is not a significant risk. In fact by your statistics it represents just over 25% of firefighter fatalities.

Of those fatalities many involve multiple deaths in one incident.

The Fire Service in the U.S. already has it's guidance with the NFPA with the professional and volunteer association that are more diligent and focused on safety of its members than any other industry in this great country regulated or unregulated.

You haven't defined anything new or came up with new revelations for dealing with this issue.

FDNY which has the most experience dealing with these structures and have perhaps the best trained officers, from time to time have a fatality in unoccupied structures. Yes the same FDNY where Vincent Dunn worked.

One of the problems with so called unoccupied or abandoned structures is that there not always unoccupied; homeless, gangs, druggies and kids use them. Some so called unoccupied structures are building under construction or renovation. In all these instance the FD has a duty and obligation to enter the building to conduct a search.

Perhaps your author(s) haven't realized that fire fighting by it very nature is hazardous. And one of the key factors of the hazards of Fire fighting is the dealing with the unknown in particular how a particular structures will react to fire.(intensity vs duration over time.

In reality all structure fires are fought using the principles outlined in your paper, Incident Command, size-up, firefighter safety, occupant safety, roof integrity, collapse zone awareness, exposures, structural soundness other hazards etc.

Also, in many cases it's only known the structure is unoccupied after the size-up and search.

To further debunk your paper I ask some simple questions. What is the difference between an unoccupied building under construction or renovation vs a building that is occupied some period during a day or a week or a month by legitimate owners or renters? Or for that matter an abandoned building being used by homeless people or druggies? None!

The job of the fire Service is to preserve life and property!!

so if what your really saying is how to do we fight fires in abandoned buidling not suitable for habitation

In my opinion the best thing that could be done with this Docket is to file it into the circular file.