



National Fire Protection Association

1 Batterymarch Park, Quincy, MA 02169-7471
Phone: 617-770-3000 • Fax: 617-770-0700 • www.nfpa.org

MEMORANDUM

TO: Correlating Committee on Fire and Emergency Services Protective Clothing and Equipment

FROM: Yvonne Smith, *Project Administrator*

DATE: September 22, 2017

SUBJECT: NFPA 1981 Proposed Tentative Interim Amendment (TIA) No. 1341

The Technical Committee on Respiratory Protection Equipment has been balloted on proposed TIA 1341, submitted by Steven Weinstein and endorsed by Dan Rossos. A copy of the proposed TIA and the preliminary results of the TC balloting are attached.

This proposed TIA is being submitted to you for letter ballot to “Add new 4.3.23.1 and 4.3.23.1.1 to the 2018 Edition of NFPA 1981”. In accordance with Section 5 of the *Regulations Governing the Development of NFPA Standards*, you are being balloted on any **correlating issues** of the proposed TIA and whether this matter is of an **emergency nature**. A “disagree” vote is limited to subjects within the purview of the Correlating Committee. Opposition on a strictly technical basis is not sufficient grounds for substantiating a “disagree” vote.

Please complete and return the attached letter ballot to Yvonne Smith either via email to ysmith@nfpa.org or via fax to 617-984-7110. **Ballots are due on Friday, October 6, 2017.**

This proposed TIA1341 has been published for public comment in the September 2017 issue of *NFPA News* with a Public Comment Closing Date of October 19, 2017. Any public comments received will be circulated to the committee. Finally, the Standards Council will review and consider the issuance of this TIA.

Note: Please remember that the return of ballots and attendance at committee meetings are required in accordance with the Regulations Governing the Development of NFPA Standards.

NFPA 1981-2018 Edition

Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services

TIA Log No.: 1341

Reference: 4.3.23.1(new) and 4.3.23.1.1(new)

Comment Closing Date: October 19, 2017

Submitter: Steven Weinstein, Honeywell Safety Products

1. Add new 4.3.23.1 and 4.3.23.1.1 to read as follows:

4.3.23.1 Where an SCBA submitted for certification to this standard is also submitted with an accessory that is built into or attached to the SCBA, or sold for later attachment to the SCBA, and an NFPA standard exists for the product performance associated with the accessory, the accessory shall be certified to the standard associated with the accessory.

4.3.23.1.1 In all cases, such accessories shall not degrade the performance of the SCBA.

Substantiation. This TIA closes a loophole that has existed for decades in NFPA product performance standards. This loophole has threatened and continues to threaten the effectiveness of NFPA standards by providing a pathway to circumvent the minimum product performance requirements developed by consensus. TIAs are being proposed at this time for NFPA 1981 and NFPA 1982, but the logic behind the TIAs should apply to all NFPA product performance standards where accessory integration exists or potentially exists.

There are NFPA standards for SCBAs (NFPA 1981 and NFPA 1986), PASS devices (NFPA 1982), thermal imagers (NFPA 1801) and ladder and escape belts (NFPA 1983). The Technical Committees responsible for developing these standards spent many days researching, analyzing, discussing and debating the issues associated with those products, ultimately agreeing on what constitutes the minimum requirements necessary to meet the fire service's needs for safety and performance. As with all NFPA standards, these standards went through a process of public input and public comment before being published by the NFPA. Once published, the standards represent what the fire service wants and needs, at a minimum, from SCBAs, PASS devices, thermal imagers and ladder/escape belts. Performance less than the minimum is not considered acceptable for use by emergency services. While it is certainly possible for manufacturers to design and produce products that fall below the required NFPA performance levels, such products would not be able to be certified as compliant with their respective NFPA standards.

One would then think that a product's status should be very simple. It either meets the performance requirements of an NFPA standard or it does not, and thus is either certified or not. Unfortunately, one would be wrong in thinking so. All a manufacturer has to do is integrate Product A that does not meet the performance requirements of its associated NFPA standard into Product B that does meet the performance requirements of Product B's associated standard, and one has effectively skirted Product A's NFPA standard. Product B is now certified as compliant to Product B's associated NFPA standard incorporating an integrated Product A that is non-NFPA-compliant.

Why is this important? It goes to the heart of the NFPA standards-writing process. Let's take thermal imagers as an example. Why invest a lot of time and money into developing minimum performance requirements for thermal imagers if all a manufacturer has to do is slap one that falls short of those requirements on an NFPA-compliant SCBA, call it an "SCBA accessory" instead of a "thermal imager," and still be able to market the SCBA as being NFPA-compliant? If a fire department wants to purchase a non-NFPA-compliant product, that is certainly their prerogative. But if a fire department wants to purchase an NFPA-compliant product, such as an SCBA, then they should have the expectation that *all* of that product is NFPA-compliant with *all* associated NFPA standards.

The same reasoning applies to PASS devices and escape belts. While it is true that all SCBA-integrated PASS devices that are currently being offered have been certified as compliant to NFPA 1982, there is no language in NFPA 1981 requiring that. An SCBA manufacturer that also manufactures PASS devices could develop a "budget" version that perhaps isn't as loud, or utilizes a different sound pattern, or has a different frequency range—all to save manufacturing cost and lower the selling price—and there is nothing in NFPA 1981 to prevent them from getting that substandard, non-NFPA-compliant PASS device certified as an accessory in an NFPA-compliant SCBA.

"This isn't really a PASS device," the SCBA/PASS manufacturer says. "It's an SCBA accessory. It's just another useful tool for the firefighter to use. Why would anyone not want to give a firefighter all the tools possible? Not everyone wants to spend the money to get a real PASS device, so we're offering them a quasi-PASS device that *almost* does what a PASS device does."

Virtually everyone would agree that this is completely unacceptable, but it could happen today without the proposed TIA.

One could create the same scenario with SCBA-integrated ladder and escape belts. "So what if this SCBA-integrated ladder belt doesn't meet NFPA 1983?" the SCBA manufacturer says. "It's better than nothing. It's just another tool in the firefighter's arsenal." Once again, the firefighter is getting an NFPA-compliant SCBA with a substandard, non-NFPA-compliant integrated accessory—this time a ladder belt.

So what we're hypothetically hearing is:

"This is just another tool for them to use."

"Requiring this accessory to meet NFPA performance requirements is overkill.

Firefighters don't need all that."

"We're giving them what they want."

"It's not really a thermal imager / PASS device / escape belt. It just looks and acts like one."

"OK, so it doesn't meet NFPA performance requirements ... but it's close."

Such dubious logic used by manufacturers to rationalize the integration of non-NFPA-compliant accessories for which NFPA standards exist undermines the entire NFPA standards development process. If an NFPA standard has minimum performance requirements, the intention should be

that those minimum performance requirements apply to the product regardless of whether it is marketed as a stand-alone device or as part of another NFPA-compliant product. Accessory non-compliance with its associated NFPA standard should not be acceptable and should preclude NFPA compliance certification of the parent product.

The proposed TIA accomplishes such preclusion. It also sets a precedent for the future integration of other devices that either already have or will eventually have their own NFPA product performance standards.

Note: This TIA is co-submitted and endorsed by Daniel N. Rossos, Oregon Department of Public Safety Standards and Training (Chair of the TC on Respiratory Protection Equipment), and it is endorsed by William E. Haskell, III, National Institute for Occupational Safety & Health (Chair of the Correlating Committee on Fire and Emergency Services Protective Clothing and Equipment).

Emergency Nature. The standard contains an error or an omission that was overlooked during the regular revision process. The proposed TIA intends to offer to the public a benefit that would lessen a recognized (known) hazard or ameliorate a continuing dangers condition or situation.

Every day that passes without this TIA in place is a day where substandard, non-NFPA-compliant accessories could be certified, shipped and used in a certified NFPA-compliant product without affecting that parent product's certification, even though NFPA standards do exist for such accessories. The door must be closed immediately to stop this abuse of the NFPA process and subversion of the NFPA's mission.

Foran, Rosanne

From: Daniel Rossos <drossos.fict@gmail.com>
Sent: Thursday, August 10, 2017 12:26 PM
To: Foran, Rosanne
Cc: Trebisacci, Dave; Bob Athanas
Subject: 1981 TIA

Endorser

Hello Rosanne,

I have been a member of the NFPA 1981 RPE committee for the past 17 years. I fully endorse and support the TIA submitted by Steve Weinstein regarding NFPA 1981 on 8/8/2017. Please allow this very important TIA to be processed.

Thank you very much.

Dan Rossos

Chair

NFPA RPE



National Fire Protection Association

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Phone: 617-770-3000 • Fax: 617-770-0700 • www.nfpa.org

MEMORANDUM

TO: Technical Committee on Respiratory Protection Equipment
FROM: Yvonne Smith, Project Administrator
DATE: September 22, 2017
SUBJECT: NFPA 1981 Proposed TIA No. 1341 **PRELIMINARY TC BALLOT RESULTS**

According to 5.6(a) in the NFPA *Regs*, the preliminary results show this TIA **HAS NOT** achieved the $\frac{3}{4}$ majority vote needed on both Ballot Item No. 1 (**Technical Merit**) and Ballot Item No. 2 (**Emergency Nature**).

34 Eligible to Vote
7 Not Returned (Anaya, Berning, Bernzweig, Campbell, Dickson, Radtke, Steedman)

Technical Merit:

3 Abstentions (*Colton, Miles, Sanders*)
14 Agree (1 *w/comment; Johnson*)
10 Disagree (*Allen, Harkness, Lancaster, Morgan, Mundy, Peterson, Profit, Sell, Tekelenburg, Trudgeon*)

Emergency Nature:

4 Abstentions (*Allen, Colton, Miles, Peterson*)
14 Agree
9 Disagree (*Gainey, Golla, Harkness, Morgan, Mundy, Profit, Sell, Tekelenburg, Trudgeon*)

There are two criteria necessary to pass ballot [(1) simple majority (2) affirmative $\frac{3}{4}$ vote]. Both questions must pass ballot in order to recommend that the Standards Council issue this TIA.

(1) In all cases, an affirmative vote of at least a simple majority of the total membership eligible to vote is required.

$$[34 \text{ eligible} \div 2 = 17 + 1 = \mathbf{(18)}]$$

(2) The number of affirmative votes needed to satisfy the $\frac{3}{4}$ requirement is 18 for both Technical Merit and Emergency Nature.

Technical Merit: (34 eligible to vote - 7 not returned - 3 abstentions = $24 \times 0.75 = 18$)

Emergency Nature: (34 eligible to vote - 7 not returned - 4 abstentions = $23 \times 0.75 = 17.25$)

Ballot comments are attached for your review.

This proposed TIA has been published for public comment in the September 2017 issue of *NFPA News* with a Public Comment Closing Date of October 19, 2017. Any public comments received will be circulated to the committee. Finally, the Standards Council will review this TIA.

Attachment

**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1341

To Add 4.3.23.1 (new) and 4.3.23.1.1 (new) of the 2018 Edition of NFPA 1981,
Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services

Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** X **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

I understand the intent and the desire of the submitters to guide non-certified components towards certification to protect the users, but I think additional clarification is needed to specify the exact components and the applicable standards. Ex: NFPA 1801, 1982, 1983,... If additional specificity isn't given there is a substantial risk that other products, which weren't intended to be, will be caught up into this TIA.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** _____ **DISAGREE*** X **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

I am unsure if this is needed as an emergency versus following procedures of discussion and then possible inclusion in the normal document cycles.



Signature

Jason Allen
Name (Please Print)

____ September 12, 2017 _____
Date

Please return the ballot on or before **Wednesday, September 13, 2017.**

PLEASE RETURN TO:

Yvonne Smith, Project Administrator

NFPA

1 Batterymarch Park

Quincy, MA 02169

FAX: (617) 984-7110

E-mail: ysmith@nfpa.org

**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
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Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** _____ **DISAGREE*** ___ **X** ___ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

The membership I represent from the ISEA could no treach a consensus for a voting position other than abstain.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** _____ **DISAGREE*** ___ **X** ___ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

The membership I represent from the ISEA could no treach a consensus for a voting position other than abstain. _____

Signature

Craig E. Colton
Name (Please Print)

September 15, 2017 _____
Date

Please return the ballot on or before **Wednesday, September 13, 2017**.

PLEASE RETURN TO:

Yvonne Smith, Project Administrator
NFPA
1 Batterymarch Park
Quincy, MA 02169

FAX: (617) 984-7110

E-mail: ysmith@nfpa.org

**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
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Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

 xxx **AGREE** **DISAGREE*** **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

 AGREE xxx **DISAGREE*** **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

After looking into the background of the proposed nature of the action, I find that there is no emergency on this issue. It can be accomplished via the routine agenda, as there is no immediate danger to any of the end users. _____

 Robin R Gainey
Signature

 Robin R Gainey
Name (Please Print)

 9/21/2017
Date

Please return the ballot on or before **Wednesday, September 13, 2017**.

PLEASE RETURN TO:

Yvonne Smith, Project Administrator
NFPA
1 Batterymarch Park
Quincy, MA 02169

FAX: (617) 984-7110

E-mail: ysmith@nfpa.org

**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
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Ballot Item No. 1:

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AGREE DISAGREE* ABSTAIN*

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

Ballot Item No. 2:

I agree that the subject is of an EMERGENCY NATURE.

AGREE DISAGREE* ABSTAIN*

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

AFTER READING THE EXPLANATION WITH
OTHER "DISAGREE" VOTES, I DO NOT FEEL THAT AN
EMERGENCY EXISTS AT THIS POINT IN TIME.


Signature

EDWARD GOLLA
Name (Please Print)

9 / 20 / 2017
Date

Please return the ballot on or before Wednesday, September 13, 2017.

PLEASE RETURN TO:

Yvonne Smith, Project Administrator

NFPA

1 Batterymarch Park

Quincy, MA 02169

FAX: (617) 984-7110

E-mail: ysmith@nfpa.org

**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

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Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** **X** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

SEE ATTACHED

Ballot Item No. 2:

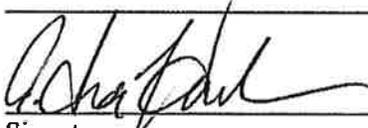
I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** **X** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

SEE ATTACHED



Signature

A. Ira Harkness

Name (Please Print)

13 September 2017

Date

Please return the ballot on or before **Wednesday, September 13, 2017.**

PLEASE RETURN TO:
Yvonne Smith, Project Administrator
NFPA
1 Batterymarch Park
Quincy, MA 02169

FAX: (617) 984-7110

E-mail: ysmith@nfpa.org

LETTER BALLOT ATTACHMENT, PROPOSED NFPA 1981 TIA LOG NO. 1341
A. I. HARKNESS, 13 SEPTEMBER 2017

Technical Merits

The Respiratory Protection Technical Committee very purposefully and with only a few exceptions limited the requirements on accessories to the extent that the SCBA be tested with accessories installed, the SCBA with accessories installed meet all design and performance requirements, and the accessories not interfere with the function of the SCBA. The exceptions (e.g. afterflame and intrinsic safety) are instructive in that they have more to do with what the accessory may do (or may not do) with respect to the safety of the SCBA user than with design and performance requirements of the accessory. It would be wise not to deviate from this deliberate decision to tend away from specifying any further design and performance requirements on accessories.

Further, the spirit of the proposed TIA is in fact a Selection issue, and perhaps a Use issue as well. Consider the following examples. NFPA 1852, *Standard on Selection, Care, and Maintenance of Open-Circuit Self-Contained Breathing Apparatus (SCBA)* requires that in selection for purchase, where SCBA-integrated PASS are installed as an accessory to the SCBA, the SCBA-integrated PASS shall be certified as compliant with NFPA 1982, *Standard on Personal Alert Safety Systems (PASS)*. And NFPA 1500, *Fire Department Occupational Safety, Health, and Wellness Program* requires personnel use SCBA compliant with NFPA 1981 when engaged in any operation where personnel may encounter atmospheres that are IDLH, etc., and that the breathing air used to fill the SCBA be compliant with NFPA 1989, *Standard on Breathing Air Quality for Emergency Services Respiratory Protection*. Similarly, NFPA 1500 requires that PASS devices meet the requirements of NFPA 1982. These examples illustrate the use of the respective Use standard and respective Selection, Care and Maintenance standard to achieve the goals of the proposed TIA.

It is argued that the product standard is enforced (“has teeth”) and therefore is the best place to implement the proposed solution to the problem that is being asserted. However, aside from the points raised above, there are the downsides and possible unintended consequences. Consider, what makes

LETTER BALLOT ATTACHMENT, PROPOSED NFPA 1981 TIA LOG NO. 1341
A. I. HARKNESS, 13 SEPTEMBER 2017

an accessory a device or product for which there is an associated NFPA product performance standard? Should the decision be left to the discretion of the certification organization or should the criteria be spelled out in the standard? How are the manufacturer and the certification organization to know if criteria are not spelled out in the standard? If criteria are not spelled out, how does the standard assure and buyers and users have confidence that the standard is enforced consistently? It is clear that the proposed TIA should not be accepted without criteria defining when an accessory is an accessory for which there is an associated NFPA product standard.

Finally, it is fair to consider logical extremes. What are the possible next steps if the proposal is accepted? The overarching proposal is carefully written to include the caveat "if a standard exists" but the danger implicit in the argument is the potential hazards of accessories that are not NFPA-compliant? Not to say anyone is intending this now, but upon approval of this TIA, is a next step a requirement that any device or product attached to or integrated with an NFPA-complaint SCBA be NFPA compliant or else the device may not be attached to or integrated with the SCBA? Is this eventual outcome what firefighters need?

It isn't wise to step beyond the present limitations in NFPA 1981 on specifying requirements on accessories. The intended purpose and objectives of the proposed TIA should properly be implemented in respective Use and Selection standards. But if the proposal were to be accepted, it is incomplete without criteria defining the case where an accessory is one where there exists a product standard associated with the accessory.

Emergency Nature

The committee probably did not discuss the exact potential hazardous loophole that is claimed in the proposed TIA. However, the committee did carefully and thoroughly consider the matter of accessories and purposefully chose to limit requirements on accessories to the extent expressed by the standard. The committee understood that there will be accessories that possibly have an associated

LETTER BALLOT ATTACHMENT, PROPOSED NFPA 1981 TIA LOG NO. 1341
A. I. HARKNESS, 13 SEPTEMBER 2017

product standard, accessories that clearly do not have an associated product standard, and accessories in the future that the members of the committee have no way of foreseeing and which may or may not at that future time have an associated product standard.

Following on the points provided under Technical Merit, any accessory, whether compliant or not, is not a hazard to the respiratory protection of the user of an NFPA-compliant SCBA, which is the scope of concern of the standard. Further, this fact is assured by both the requirements of NFPA 1981 as well as the requirements of 42CFR84 and NIOSH certification.

**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1341

To Add 4.3.23.1 (new) and 4.3.23.1.1 (new) of the 2018 Edition of NFPA 1981,
Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services

Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** _____ **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

While I agree this is an issue that needs to be addressed by the Technical Committee

I think the TIA is too broad as written. I believe there could be a lot of unintended
consequences if the TIA is passed as currently worded in 4.3.23.1. Specific accessories
and the related Standards need to be defined better.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** _____ **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

Beth C Lancaster
Signature

Beth C Lancaster
Name (Please Print)

07 September 2017
Date

Please return the ballot on or before **Wednesday, September 13, 2017**.

PLEASE RETURN TO:
Yvonne Smith, Project Administrator
NFPA
1 Batterymarch Park
Quincy, MA 02169

FAX: (617) 984-7110

E-mail: ysmith@nfpa.org

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Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** _____ **DISAGREE*** _____ **X** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

__ The Respiratory Protective Equipment Committee has not been given sufficient information or time to vet the issue.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** _____ **DISAGREE*** _____ **X** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

The Respiratory Protective Equipment committee (RPE) has not been given sufficient information or time (via a meeting) to vote either agree or disagree on the emergency nature of this action. Members of the RPE committee have not had a chance to vet the many issues that could be involved. The technical committee on Electronic Safety Equipment (ESC) should consider addressing the action in committee and make a recommendation to the RPE.

Since there are no effects on the fit, form and/or function of the SCBA or pneumatics with this accessory and it is not a required piece of the SCBA, there is insufficient information at this time to justify an emergency nature of the TIA.

Stephen T. Miles
Signature

Stephen T. Miles
Name (Please Print)

09/20/17
Date

**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1341

To Add 4.3.23.1 (new) and 4.3.23.1.1 (new) of the 2018 Edition of NFPA 1981,
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Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** **X** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

The TIA would tie all standards together and goes beyond the Scope of this standard as defined in Chapter 1. It would create different standard requirements for each approved accessory. This prevents AHJs from making product selection decisions on a per-product basis. An AHJ will no longer be able to select equipment with accessories to meet their specific operational requirements but will be forced to use those which meet all applicable standards, or select equipment not certified under NFPA. Many AHJs have operational requirements for products that use an accessory not certified to the applicable standard but are certified for use with the base product (e.g., 60-second PASS, radio with man down alarm feature, non-1801 TIC incorporated on an NFPA certified fire apparatus, non-1801 TIC incorporated on an SCBA). The TIA implies that AHJs and users do not understand that NFPA certifications are made for particular products (i.e., a 1982 PASS certification is separate from a 1981 SCBA certification) and that AHJs and users erroneously believe that an SCBA 1981 certification implies that any accessories are certified to other standards even though not labeled or documented as such. We see no justification to conclude that the fire services do not understand NFPA certifications and product labels. As written, the TIA will create great ambiguity as to how the proposed additional language is to be interpreted in conjunction with existing language addressing accessories.

Ballot Item No. 2:

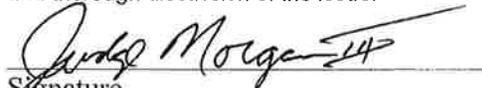
I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** **X** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

The TIA does not meet the requirements of Section 5 of the Regulations Governing the Development of NFPA Standards because it is not of an emergency nature. Accessories are already addressed in NFPA 1981 in 1.1.4 (and in Annex thereto), 1.3.2 and in detail in Chapter 6.7. Accessories have therefore were clearly not overlooked. The TIA does not identify a particular hazard requiring an emergency remedy. The TIA calls for implementation with the 2018 edition of NFPA 1981 and not 2013, indicating that no emergency exists. Also, if the change is proposed for the 2018 standard, it should be raised through a NITMAM and not through a TIA which circumvents careful consideration and thorough discussion of the issue.


Signature

JUDGE MORGAN III
Name (Please Print)

9/12/2017
Date

Please return the ballot on or before **Wednesday, September 13, 2017.**

PLEASE RETURN TO:

Yvonne Smith, Project Administrator

NFPA

1 Batterymarch Park

Quincy, MA 02169

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E-mail: ysmith@nfpa.org

**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1341

To Add 4.3.23.1 (new) and 4.3.23.1.1 (new) of the 2018 Edition of NFPA 1981,
Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services

Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** **X** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

1. Every fire service member, first responder and end user should take notice to what is being presented by this TIA change to the NFPA standard. The substantiation authored, omits facts and flaws in the NFPA process, I believe that this TIA is being used to pit a manufacturer against other manufacturers at the detriment of end users being used as pawns in the process. I will try to make this as fact based as possible to provide the information for first responders, end users and public comment.
Facts as I know them:

2. The following minutes are from the TCC on Fire and Emergency Services Protective Clothing and Equipment meeting held from 5/31-6/1/17:

2a .

Agenda Item 8: NFPA Certified Product with Non-Compliant Technologies/Systems/Equipment, Bob Athanas

Bob Athanas provided an update on a scenario where a compliant product could include a non-compliant technology that had an NFPA standard available. In this particular example the discussion focused on Thermal Imaging capability being included in NFPA 1981 compliant SCBA, but was not also certified as an NFPA 1801 thermal imager. After significant discussion, the TC Chairs for RPE (Dan Rossos) and for ELS (Bob Athanas) were advised to discuss with their committees and develop a path forward, including the option of future TIAs. The Correlating Committee also discussed the broader implication of this approach to other standards within the project."

2b. A part of the TCC "significant discussion" included a preliminary show of a hands vote, to see if this Second Correlating Revision would pass and make this revision a standard at that TCC meeting. The raw show of hands did not carry the vote. The TC's of 1981 and 1982 were advised to discuss the issue with their committees. A discussion to develop a path forward did not happen in TC 1981.

2c. On 8/8/17 Steve Weinstein employed by Honeywell Safety Products filed this TIA

2d. On 8/12/17 Dan Rossos sent a letter to Rosanne Foran endorsing and approving this TIA

2e. On 8/30/17 A conference called was held for TC 1981 members to notify of the pending TIA

2f. An hour later on 8/30/17 the TIA was sent out to TC 1981 members for a vote.

2g. This TIA will allow all accessories to be available for a compliant SCBA until 12/31/2018 then stop on that date.

2h. The third edition TC 1801 (TIC) revision standard has been (short cycled) from 5 years to 3 years. The issuance date will now be 11/4/20.

2i. The first edition NFPA 1801 (TIC) standard had an effective date of 12/5/2009. There were testing issues and performance standards flaws. Around 3/2011 a TIA was issued but did not correct all the problems. The second edition 1801 was issued with an effective date of 6/18/2012. The first certification of any TIC to 1801 did not occur until 1/20/13 over three(3) years after the standard was initially adopted.

2j. There are two (2) TIA's being simultaneously presented at this time. TC 1981 and TC 1982. Both propose the same language. The TCC will make a final decision based on public comment and TC discussion. Public comment should be made on both TIA's, as both TC's are equally affected when presented to the TCC.

3. The reasons to disagree with the **TECHNICAL MERITS** of Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

3a. The last sentence from section 2a above states. (TCC minutes)

The Correlating Committee also discussed the broader implication of this approach to other standards within the project."

I would compel all TC members, first responders and SCBA end users to read that sentence slowly. Then focus on the words "broader implications". This TIA will allow an open season for standards manipulation, especially by someone who sits on numerous committees. Drafting language in one committee can book end or close a path in another committee. I have seen this happen. *Broader implications* only begin to describe how narrowly any performance standard or rule can be interpretive or misused if desired. The TCC had full opportunity and authority to pass this TIA language at the Second Correlating Revision and did not. Why is this TIA passed down to TC 1981 and TC 1982 who are less knowledgeable and have less information.

3b. The TIA substantiation as written, is rambling in structure, alarmist and misleading on how it presents standards compliance and accessory equipment that can accompany an SCBA. All accessories must be submitted by the manufacturer only. No foreign competitor can just slap an accessory on.

All SCBA accessories meet the requirement of NFPA 1981 including the integrated TIC. The SCBA TIC has been available for over 2 years. There could be close to 10,000 SCBA TIC's that are in the market. An average of 5 members each may be assigned to use a single SCBA. That would estimate 50,000 first responders, who choose to use this accessory. First responders do due diligence when choosing any equipment, more than this TIA gave any (no) credit to.

The NFPA 1852 is the comprehensive guide, used in selection, care and maintenance. Its sole purpose is to guide an end user on what to consider when choosing an SCBA and accessory equipment. A firefighter in a zero visibility environment is at a complete disadvantage and at

the most vulnerable part of an operation. Only a firefighter who has done this knows the challenges of a blind search. The TC 1801, TC 1982 and TC 1981 knew for 2 years that an SCBA accessory TIC were available. TC members had meetings with manufactures to discuss them. TC 1801 could have easily opened language (a path) to create a handless TIC standard. This technology (handless TIC) is the future and it is here now. It provides every firefighter with an SCBA the ability to navigate with confidence in a zero visibility environment using a TIC. Lives have been saved and will continue to be saved with this accessory, mostly firefighters. I would add, the technology is now embraced by end users. There may be up to 10,000 SCBA with this technology in the market to date, more will continue, as the value is recognized. This TIA creates an unrealistic end date that considers no substitution or alternative to a firefighter or AJS. I propose, a TC 1801 TIA change of language from reading, all TIC's, to, *handheld TIC* only. The 1801 standard never foresaw or adapted to a handless TIC. TC 1800 has been short cycled to a 3 year revision cycle. This clearly puts that TC in a position to deal with any SCBA accessory TIC in a timely and orderly manner. I believe this TIA, singles out the SCBA attached accessory TIC. The TCC and TC's 1981,1982 and 1801 knew of it and did not create a pathway.

In the 1989 standard, 2018 edition, a pathway was made for liquid (cryogenic) air, a new technology that may provide a better SCBA with cryogenic air. It is a different technology that the TC adapted for. This is supposed to be the normal process and platform of NFPA standards. In short, NFPA TC 1801 failed to use the consensus abilities of a TC and left technology to die on the vine so a TIA could undercut end user needs and AJS needs.

4. NFPA standards writing is not an exact process in itself. It usually becomes apparent when the flaws present themselves. Examples.

4a.NFPA 1981 2007 edition- Voice communications standard- 5 years of TG work designed to make a voice amplifier mandatory by making a performance test that no mechanical voicemitter could pass. Results of 5 years work, all manufacturers SCBA's passed the test. A TC member / manufacturer was adamant that mechanical voicemitters were physically impossible to improve and first responders demanded a voice amplifier be mandated. Fire service members on the TC disagreed, found a better testing method called STI and saw voicemitter performance improve by about 50%. This basically eliminated the need for voice amplification. This was a 10 year process.

This substantiation is relative to the testing done in 1801 in many ways and shows that one performance standard is not a cure all for all equipment. An existing standard may not be the solution to new technology or problem. The NFPA policy was designed to enhance and not stifle end user products. By trying to incorporate all standards to cross reference each standard, may alter or even eliminate equipment that were never meant to be the scope of a certain standard. This will be a real issue if this TIA moves forward. A narrowly written standard, written somewhere (anywhere) can be interpreted and effectively change, eliminate or stifle something that it had no intention of doing.

4b. NFPA 1982 2013 edition – Universal PASS sound – It took about 3 years after the standard was issued for the TC to come terms for a suitable performance and acceptable test.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** X **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a “disagree” or “abstain” vote.

The TIA has no merits as an emergency nature. As by the terms of the TIA, any available accessory equipment can be bought and sold until 12/31/2018. This TIA accessory restriction date, on its own merits dispels any contention that there is an emergency nature. It is clearly not veiled in urgency or emergency.

All 1981 SCBA accessories meet 1981 approvals. That is the scope of 1981. The TIA substantiation distorts and misrepresents this by eluding that something other than this fact could exist. It does not. It alludes to a nefarious nature manufacturers can use, for approvals and compliance. There is none.

I question the alarmist nature of the substantiation. It is curious to me at best. I have 12 years tenure on TC 1981. TC 1981 met 5 days before the TCC meeting. No discussion of any concern regarding a TIA was mentioned and does not sync with the emergency nature in this substantiation for a TIA.

Every approved accessory, that accompanies an approved NFPA SCBA, enhances its use for first responders. These are smart, intelligent designs that are there for a specific use and need if the end user decides so. All approved SCBA accessories, provide a level of extra safety and protection. To decry, that this TIA is needed “to stop this abuse of NFPA process and subversion of NFPA’s mission” is a show of complete situational **unawareness** of what is real and what is rhetoric. I find this TIA to be, using the term, “subversive”, to be directed at the end user and AHJ. I urge any and all fellow TC members and first responders to not fall into this misaligned, TIA. The NFPA process is heavily weighted by the input of public comment. I urge all end users to consider each 1981 and 1982 TC members response to this TIA. After review weigh in and make a public comment regarding this TIA on the merits presented. The closing day for public comment is 10/19/17. Make your voice be heard and counted.


Signature

William Mundy FDNY
Name (Please Print)

9/21/2017
Date

Please return the ballot on or before **Wednesday, September 13, 2017.**

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**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1341

To Add 4.3.23.1 (new) and 4.3.23.1.1 (new) of the 2018 Edition of NFPA 1981,
Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services

Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** **X** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

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The integrated situational awareness devices and integrated PASS devices that do not meet NFPA 1982:2013 that have been certified on NFPA 1981:2013 compliant devices appear to meet the desires or needs of user community and are currently being utilized. No field complaints, near misses or fatalities have been reported that have been attributed to the use of these types of integrated devices. Additionally, the use of these integrated accessories such as these do no reduce the intended level of respiratory protection as both the NIOSH and NFPA evaluations performed for approval include such devices.

Understanding the needs and desires of the fire service is important in making decisions related standards development activities. Rather than disallow these new and innovative technologies, the NFPA should consider developing a relevant standard for situational awareness devices.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** _____ **DISAGREE*** **X** **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

The presence of integrated accessories on SCBA does not compromise the respiratory protection provided. This is validated by the evaluations and tests done to demonstrate compliance to *Title 42, Code of Federal Regulations, Part 84*, the NIOSH SCBA CBRN Statement of Standard and NFPA 1981.

Jeffrey Peterson
Signature

Jeffrey Peterson
Name (Please Print)

September 12, 2017
Date

Please return the ballot on or before **Wednesday, September 13, 2017.**

PLEASE RETURN TO:

Yvonne Smith, Project Administrator

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_____ **AGREE**

 X **DISAGREE***

_____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

AFTER FURTHER THOUGHT THIS IS AN IMPORTANT
TOPIC WITH MANY FACETS, IT DESERVES THE
FULL ATTENTION AND TIME AT A REGULAR
MEETING.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE**

 X **DISAGREE***

_____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

SAME REASONS AS POSTED IN MY FIRST VOTE
THIS SHOULD BE DISCUSSED IN A NORMAL MEETING
WITH EVERYBODY HAVING THEIR VOICES HEARD.



Signature

BRYAN PROFIT

Name (Please Print)

9/20/17

Date

Please return the ballot on or before **Wednesday, September 13, 2017.**

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**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
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_____ **AGREE** _____ **DISAGREE*** **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

BASED ON POTENTIAL AND/OR PERCEIVED
COMMERCIAL INTERESTS, I AM ELECTING TO
ABSTAIN FROM VOTING ON THIS TIA.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

AGREE _____ **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

Stephen R. Sanders
Signature

STEPHEN R. SANDERS
Name (Please Print)

SEPT. 12, 2017
Date

Please return the ballot on or before **Wednesday, September 13, 2017.**

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**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

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_____ **AGREE** **X** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

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In principal, Draeger support the technical merit, but it is also observed that there are numerous questions that are unanswered about the scope and approval implementation and the impact on future approvals of existing certified equipment. To support the Technical Committee with a path to a clearer understanding, the following points and questions are being offered:

- 1. If one concern is about the specific integration of TICs with SCBAs or PASS devices, it would be better to follow the principle set out in the standard alarm TIA where a task group was charged to develop the correct wording to modify the standard. This would focus on NFPA1801 to allow the new and novel improvements to be added and either implement them as part of the normal revision process or propose a TIA in 1801 if the emergency nature can be justified. This will allow the equipment in question to be fully certified as soon as possible.***
- 2. There is unclear direction about the ability to ship currently approved product or the rules surrounding the timings of different standards effective dates. If this TIA is accepted, for example, when it comes about that the NFPA1802 Radio communications standard is released, does it mean that any radio communications equipment, certified to the current revision of the SCBA standard, will have to be upgraded to be approved to the new 1802 standard immediately? If a change is applied to a certified product mid-way through its certification to a specific revision but after the release of 1802, will the SCBA & radio communications equipment therefore lose their certification until they achieve the 1802 approval?***
- 3. The reason 1982 and 1981 were aligned to the same revision cycle was to avoid any uncertainties about timings of integrated equipment certification. Does this mean that more standards should be aligned in the same manner? Will the ESE Technical Committee have the capacity to do this for all of its standards as the technical convergence trend continues?***
- 4. Does this change mean when NFPA1802 is released, Fire Departments will have to upgrade their radios to NFPA1802 compliant ones when they buy new 1981 SCBA as the whole system will only be approved if fitted to NFPA1802 approved communication equipment because the standard exists?***
- 5. Additional wording is recommended to cater for future technological solutions developed that offer real customer benefits (for example as described in***

NFPA1982:2013 Annex A1.1.2 for location systems to attach to RF-PASS in future) that are new and novel features/functions that are not catered for in an existing NFPA standard and therefore cannot ever be certified. This would allow the certification organization to set out the steps to prove 'minimum' safe performance of new innovations up until the new revision of the standard is available. The "certification organizations" must agree to the robustness tests and performance criteria for the new and novel feature/function to allow an approval certification. Additional warnings placement on product and in instruction manuals may be beneficial to let the buyer be aware.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** **X** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

1. The Emergency Nature of the request is missing from the substantiation. The substantiation is subjective without real evidence of the risks. There were no reports of actual product failings from user reported incidents or independent laboratory tests of devices and their deficiencies presented. Therefore it was difficult to judge the severity of the problem and a suitable response needed for in-field equipment in particular. A risk assessment with categorization in terms of Critical, Major A, Major B or Minor hazard would have assisted judge the problem. This type of assessment was delivered for the alarm sound problems reported as part of the Task Group work for NFPA1982:2013 in December 2015.

2. Insufficient time has been allowed for the TIA to be reviewed and questions answered. For example, the TIA in NFPA 1982 in 2016 for the full alarm sound was implemented too quickly and reported to the committee that significant logistical change and reaction to it had to be made. This TIA entry has not paid heed to the lessons learned in terms of open communication to all committee members responsible for the standard texts and as such leaves little alternative than to reject at this time and to request an open forum at the next committee meeting to answer the questions. As an another example, the TIA states that the loophole is entirely allowing products that fall 'below' the required NFPA performance levels to be able to be approved as NFPA compliant and skirting the standards process. This is not the entire scenario and therefore misleading. Another possible scenario presents itself where an innovation or technical application is made that further increases the options and benefits for use by Fire-fighters. For example in the use of lighter weight materials, product packaging, functional integration, scale, maximum and minimum holding capacities that fall outside of specific clauses in an existing NFPA standard.

3. Consistency in guidance on emergency nature rules is requested. A specific example exists where a technical application allowed a potentially inferior product on the market. This is to be prevented by the normal NFPA revision cycle in the Second Revision of 1801 for TICs (see below SR No.5 1801-2016 8.1.3.5). This loophole was not considered to need an urgent TIA and yet similarly allowed a potentially inferior product for sale:

Submitter Information Verification

Submitter Full Name: Dave Trebisacci

Submittal Date: Tue Jul 12 12:33:04 EDT 2016

Committee Statement:

Recently, some thermal cameras have been designed and marketed that incorporate a visible light camera output overlaid on to the thermal image. While the fused image enhances the performance of thermal cameras in ambient light environments, especially for thermal cameras using low resolution FPAs, image enhancement using visible light sensors are not useful in smoke conditions. Response Message: Public Comment No. 5-NFPA 1801-2016 [Section No. 8.1.3.5]



Signature

Robert Sell

Name (Please Print)

September 12, 2017

Date

Please return the ballot on or before **Wednesday, September 13, 2017.**

PLEASE RETURN TO:

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**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

PROPOSED TENTATIVE INTERIM AMENDMENT LOG NO. 1341

To Add 4.3.23.1 (new) and 4.3.23.1.1 (new) of the 2018 Edition of NFPA 1981,
Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services

Ballot Item No. 1:

I agree with the **TECHNICAL MERITS** of the Proposed TIA to add 4.3.23.1 (new) and 4.3.23.1.1 (new).

_____ **AGREE** X **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

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MSA supports the intent of this TIA as stated in the proposed additions of sections 4.3.14 and 4.3.14.1. However, technical merit of this proposal encompasses more than just the two paragraphs covered in this TIA. To have technical merit, a TIA should allow for a complete implementation, including requirements for design, performance, and testing in all relevant standards.

Implementation of this TIA would require broader changes not only to this standard but to standards that set requirements for those SCBA and PASS integrated accessories for which NFPA standards exist. For example, the NFPA 1982 2013 Edition standard includes discrete performance requirements and test methods for 1) stand-alone PASS and removable integrated PASS and 2) non-removable integrated PASS. Specifically, NFPA 1982 2013 Edition Table 4.3.10(a), Specimens 4-6, defines impact acceleration requirements for stand-alone PASS and removable integrated PASS whereas Table 4.3.10(b), Specimens 4-6, specifies vibration test requirements for non-removable integrated PASS.

The above technical concerns point to the need for a thorough review by the relevant technical committees. For the examples cited in the TIA substantiation, NFPA 1801 and NFPA 1983 would require appropriate review and revision to accommodate both stand-alone and SCBA integrated configurations. Without proper technical committee consideration and review, it is likely that additional technical issues will be created, leading to additional testing and certifying problems. We feel that it is critical that the respective technical committees are given an opportunity to identify any and all conflicts this initial TIA may create. Once the full impact is identified, TIA(s) will need to be created for any impacted NFPA accessories (TICs in particular) and the current TIA(s) will need to be updated and resubmitted, to reflect the necessary test procedures and the updated test matrices.

As currently written, this TIA does not provide enough clarity to implement its desired intent and does not provide a clear pathway for certifying integrated accessories like those noted in the substantiation.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** X **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

We do not agree that this proposal is an emergency.

First and foremost, the accessories targeted by this TIA must be tested to requirements imposed by the host device's NFPA standard(s): In this case, NFPA 1981 and 1982. The host standards provide assurance that the integrated accessory does not degrade performance of the host device when evaluated with a range of stringent tests including, but not limited to, heat and flame, vibration, tumble vibration, case integrity, heat and immersion leakage, corrosion, and high temperature functionality. In fact, for the thermal imaging example cited in the TIA, NFPA 1981 and NFPA 1982 have stricter performance requirements in some cases than NFPA 1801. Additionally, MSA conducts robust testing and customer field validation prior to delivering any product to the fire service, regardless of whether that product has any applicable NFPA standards associated with it.

While it appears there may have been some isolated confusion in the marketplace regarding the NFPA compliance of integrated TICs, there has not been an outcry from the user community. In the short term, any confusion about integrated TIC compliance could be better addressed through user education.

Finally, while we agree that the additions of the above sections to chapter 4 are logical, the TIA(s) are premature. The technical committees must be given time to fully understand the impact on other product standards, propose the changes to the standards' language, and make the necessary adjustments to the testing matrices in the impacted standards.


Signature

MARCO TEKELEBURG
Name (Please Print)

09-13-2017
Date

Please return the ballot on or before **Wednesday, September 13, 2017**.

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**TECHNICAL COMMITTEE ON RESPIRATORY PROTECTION
EQUIPMENT LETTER BALLOT**

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_____ **AGREE** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

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NFPA 1981 already considers accessories in the scope (1.1.14) and Application (1.3.3. and 1.3.4) and does not need to add new requirements on accessories. The second clause 4.3.23.1.1 *In all cases, such accessories shall not degrade the performance of the SCBA* is inappropriate and unenforceable. How is it determined if the accessory degrades the SCBA unless it is tested at the time of certification? The TIA will limit innovation by restricting accessories to existing standards and prevent the adoption of new products that will be allowed in future versions.

Ballot Item No. 2:

I agree that the subject is of an **EMERGENCY NATURE**.

_____ **AGREE** **DISAGREE*** _____ **ABSTAIN***

EXPLANATION OF VOTE - Please type or print your comments:

*An explanation shall accompany a "disagree" or "abstain" vote.

Currently if an Authority determines that they have an operational requirement that needs an accessory that does not meet the standard, they are able to have that accessory as long as it does not compromise the performance of the SCBA, which permit the SCBA to maintain its NFPA 1981 certification. This TIA would change that situation to the point that if an AHJ has an operational requirement that does not fall into what the TC committees have determined they should be, the AHJ would be left with an SCBA that is no longer NFPA approved.



Signature

_____ Mark Trudgeon _____
Name (Please Print)

_____ 09.06.2017 _____
Date