

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

---

**From:** mbutler@smcvfd.org  
**Sent:** Wednesday, March 04, 2009 10:39 AM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 141 - FFUS Comments

**Name**  
Mike Butler

**Organization**  
South Montgomery County Fire Department

**Email**  
mbutler@smcvfd.org

**Address**  
26010 Bearborough  
Spring, Texas 77386  
United States

**Comments**

After reading this document, in my opinion, I have concluded that this possible standard will take away the ability of the fire service to perform it's primary functions. The document states that "no offensive attack shall be performed, if the structure is deemed unoccupied" and further states that someone only has to tell the fire department that no one is in the structure in order for this possible standard to take affect. The fire service will no longer be able to perform primary searches to truely deem that the structure is unoccupied, nor will we be able to extinguish what might have been a small room and content fire, using a single attack line, but will have to now have to stand outside and watch the structure burn to the ground. How do we explain this to our taxpayers?? How do we explain the sharp rise in insurance costs because of this standard?? How can a standard tell us that there isn't someone inside a structure?? I personally made a fire last week, where a neighbor told us that no one lived in the house. We made our way to the fire, and found a victim. The victim happened to be the home owner that no one had seen in a while. This is a prime reason why this standard should not be passed.

Why is NIOSH trying to set the fire service back 50+ years?? While I am all for safety, this standard will do nothing but ruin the fire service.