

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

From: Gary Outlaw [goutlaw@cityofhumble.net]
Sent: Wednesday, March 30, 2011 2:22 PM
To: NIOSH Docket Office (CDC)
Subject: Docket # 221 42 CFR Part 84

To Whom it may Concern;

Please review Docket # 221 and insure that there is no unfair manipulation of the market. I've read the information provided by the cylinder manufacturers and they estimate somewhere between 200% – 800% mark-up in cylinder costs from the SCBA maker.

The following information was downloaded @ http://www.scifireandsafety.com/faq.asp#faq_q4

What is the difference(s) between the cylinders sold by Respirator Manufacturers and those cylinders sold direct to First Responders through SCI direct sales program?

In the simplest terms, only the label is different. Cylinders sold through respirator manufacturers are of the same form, fit and function as those sold through SCI's direct sales program. First responders purchasing through SCI's program have access to other cylinders that are not available through respirator manufacturers. SCI customers have the opportunity to benefit from our [DURA-LITE 15™](#) technology, Custom Labeling and our newest product, a [30 Year Life](#) SCBA cylinder.

Do Respirator Manufacturers (e.g. Scott®, MSA®, et.el) manufacturer composite cylinders for use in the North America?

No. DOT (or TC) approved composite SCBA cylinders sold in North American are made by SCI or one of two other manufacturers holding a DOT Special Permit. Respirator manufacturers procure cylinders via a bid process, oftentimes selecting the lowest cost cylinders from one of these three composite cylinder manufacturers.

Sincerely,

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