

Dear Valued Customer,

Scott Safety would like to make you aware of a recent change impacting the issuance of the NFPA 1981, Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services, 2018 Edition.

Early in the standard development process, a new design requirement was proposed for the Emergency Breathing Safety System (EBSS), commonly referred to as the "buddy" breather, to incorporate new low-pressure hose fittings that would be universal across all SCBA manufacturers. This requirement is referred to as Universal EBSS, or UEBSS for short. The intent of this requirement, an intent which **Scott Safety fully supports**, is to mitigate any potential compatibility issues that may exist in the fire service today. The concept of the UEBSS is that it would allow a firefighter to provide air to another firefighter. However, the requirement, as proposed, is not considerate of those fire departments that already use some form of EBSS, particularly those departments that have regionalized their response and equipment purchases, and how the change to a universal fitting would impact their ability to perform EBSS operations. In essence, fire departments that are currently able to perform successful EBSS operations today with other departments using SCBA from the same manufacturer would cease to be compatible with their mutual aid company, thus creating the problem that the proposed UEBSS requirement is trying to resolve.

Scott Safety recognized this problem early on and investigated alternative options that would take into account the proposed requirement for a set of universal fittings, while protecting fire departments that elected not to upgrade their SCBA to the new (proposed) UEBSS. The solution was to allow manufacturers the ability to offer an optional 3<sup>rd</sup> fitting that would maintain compatibility with previous EBSS designs already deployed in the field, while also incorporating the new (proposed) UEBSS fittings. This solution would maintain compatibility between new and existing SCBA users, ensuring safety for all firefighters. It would also not force the 3<sup>rd</sup> fitting would be optional at the time of purchase. Scott Safety sought guidance from the Chairman of the Technical Committee on Respiratory Protection Equipment and was advised that this would not meet the proposed standard. Scott Safety proceeded to submit a request for Formal Interpretation to the NFPA Standards Council seeking a formal conclusion on whether a 3<sup>rd</sup> fitting could be included. We await a final decision from NFPA, but our expectation based on preliminary responses is for confirmation that the proposed standard does not allow for the inclusion of a 3<sup>rd</sup> fitting.

In an effort to prevent what Scott Safety believes will create an unintended safety issue within the fire service, our only option was to file a Notice of Intent to Make a Motion (NITMAM). Under NFPA rules, any individual or organization wishing to make an allowable amending motion at an NFPA Technical Meeting must declare their intentions by filing, within the published deadline, a Notice of Intent to Make a Motion (NITMAM). The Motions Committee of the NFPA Standards Council, in accordance with NFPA rules, reviews each NITMAM to



determine whether the intended motion is a proper motion. Under NFPA rules, proposed NFPA Standards shall be presented for action at the NFPA Technical Meeting only when an Amending Motion (NITMAM) has been certified by the Motions Committee as a proper amending motion. Scott Safety officially filed a NITMAM on August 31, 2017 and the NITMAM was certified by the Motions Committee on October 10, 2017. Scott Safety waited until the last possible day to file its motion, hoping that before that date we would receive a favorable response to our request for Formal Interpretation. Having not received a favorable response, we had no option other than address what we believe is a significant safety concern by raising the motion to eliminate the proposed UEBSS language from the new standard. NFPA procedures did not permit us to move to add a third fitting to the standard, therefore we could only propose reverting to EBSS language found in the current NFPA 1981, 2013 Edition.

The NFPA Technical Meeting, also known as "Tech Session", is an important element in the standards development process. The Tech Session ensures that consensus is achieved on proposed changes to NFPA standards prior to Standards Council review. During this meeting, supporters and opponents of certified motions voice their opinions and NFPA members are given an opportunity to vote on proposed changes. Scott Safety will present our justification for filing the NITMAM at the next NFPA Technical Meeting scheduled for **June 11-14, 2018** in Las Vega, NV. The Chairman of the Technical Committee on Respiratory Protection Equipment will also have an opportunity to address the meeting attendees regarding the reasons why the UEBSS language was proposed as part of the NFPA 2018 standard. At that time, a consensus vote will be held to determine whether the NITMAM is approved or rejected.

The reason Scott Safety chose to file the NITMAM is simple. While we do not dismiss the fact that the NFPA Technical Committee had the best intentions of the fire service in mind when it proposed the new UEBSS requirements, we strongly feel that these requirements will create an unintended safety issue within the fire service and one that will not be undone for 15-20 years, at a minimum. There are hundreds of thousands of SCBA currently in use in the North American fire service and a majority of those use some form of EBSS. Without consideration for an optional 3<sup>rd</sup> fitting, those fire departments will be left incompatible with their neighboring jurisdictions. Beyond compatibility issues with neighboring jurisdictions, the implementation of the UEBSS without allowing the option for a 3<sup>rd</sup> fitting could create logistical and safety issues within a fire department itself, as many departments specify new SCBA as part of new fire station construction or apparatus replacement. These fire departments would be forced to maintain different configurations of SCBA meeting different editions of the NFPA 1981 standard that would no longer be compatible with one another in EBSS operations.

Following consensus vote by NFPA members, the potential outcome of the NITMAM is as follows:

1. If **approved**, the UEBSS requirements will be removed from the proposed standard and replaced with the current language found in the NFPA 1981, 2013 Edition standard.

2. If **rejected**, the UEBSS requirements will remain as written in the proposed NFPA 1981, 2018 Edition standard.



Regardless of the outcome of the vote, the issuance date for the NFPA 1981, 2018 Edition standard will be delayed. We anticipate the delay will be approximately 9 months, from November 2017 to August 2018. As a result, the effective date of the standard will also be delayed, from December 2017 to September 2018 (estimated). At that time, NFPA will open the submission window for SCBA manufacturers wishing to submit SCBA for testing and certification to the NFPA 1981, 2018 Edition standard. Based on historical data, it would likely be another 6-9 months before NFPA 1981, 2018 Edition certifications are issued. The end result– manufacturers will not be able to provide SCBA approved to the NFPA 1981, 2018 Edition standard until sometime in early calendar year 2019.

Sincerely,

Jason Cannon | Sr. Manager, NFPA Air-Supplied Products SCBA & Fire Solutions 3M Personal Safety Division