The Honorable Douglas L. Parker

Assistant Secretary of Labor for Occupational Safety and Health

Occupational Safety and Health Administration

U.S. Department of Labor

200 Constitution Avenue, NW

Washington, DC 20210

Comments: Docket ID: “Emergency Response Standard” (Emergency Response) Rule [Docket No. OSHA-2007-0073] (RIN 1218-AC91)

Dear Assistant Secretary Parker,

We appreciate OSHA’s attempt to try and keep emergency responders safe through the new 1910.156 Emergency Response Standard. While there are many great initiatives in the proposed document, we feel that as written, this document is neither technically nor economically feasible for our emergency response agencies. The prosed document is arbitrary and capricious in that it fails to demonstrate a significant need and prove that each of the new requirements would have a significant positive effect on reducing responder injuries and deaths. OSHA did not use the full negotiated rule making process in developing this proposed standard and we would like the opportunity to participate in the process moving forward.

The (Your Organization) is a (career, combination, volunteer) emergency response agency located in (city), (State). We currently operate with an annual budget of ($$$$) and answer approximately (xxx) calls for emergency service each year. We take responder safety seriously and have already implemented several of the recommendations in this proposed standard. We do however have serious concerns with (Take one or more of the pain points and explain your concern here).

We are asking OSHA to remove the incorporated by reference NFPA standards and place the language of the mandate directly into the proposed rule. We are asking OSHA to include representatives of volunteer and combination department responders and representatives from the Authority Having Jurisdiction to be included in the process moving forward. We are asking for clear communication on further in-person and written comment periods. We are asking for a new proposed rule that is technically and economically feasible, uses solid data and scientific theories that will reduce responder injuries and deaths, and is clear on exactly what is required.

Thank you,

(Your Name)

(Your Contact email and phone number)