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The Honorable Douglas 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

RE: Docket Number OSHA-2007-0073 – Emergency Response to replace the current Fire Brigades Standard

Dear Secretary Parker,

I write today to express my concern about the proposed fire brigades standard. As a member of a volunteer fire department in XXXX, the changes this would require in our organization would be devastating. We would likely lose 50% of our membership, leaving us unable to adequately respond to calls. With the difficulties that volunteer departments already face with firefighter recruitment and retention, this loss of membership would be catastrophic for most small rural fire departments, including ours. It would also cause departments to have to increase the cost of contracts with municipalities and/or increase fundraisers by 25% to pay for increased costs related to medical exams, etc.

While the intent behind the changes may be to overall increase protections for firefighters and promote increased safety, it will have the opposite effect. Short-staffed, under-funded volunteer fire departments would have to make do with fewer volunteers and less money, creating potentially dangerous situations when responding to fire calls. The other possibility is that fire departments may fold and close their doors, leaving residents vulnerable to having no one respond to their fire emergency, except the next nearest department which may be many miles away in rural areas and which will also be struggling to stay open under these proposed rules.

Please reconsider the scope and speed of these proposed changes. The Firefighters Association of New York, as well as other statewide organizations, should be directly consulted and their input prioritized as decisions about this proposal are made.

Sincerely,

YYYYYY

cc: Senator Chuck Schumer
Senator Kirsten Gillibrand
Congresswoman Claudia Tenney
Congresswoman Elise Stefanik
Congressman Brandon Williams
(CHOOSE ONE OF THE CONGRESS MEMBERS)

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