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**COUNTY FIRE COORDINATORS
ASSOCIATION OF THE
STATE OF NEW YORK**



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TO: OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
FROM: Bill Streicher, President, County Fire Coordinators Association, State of New York
RE: COMMENT ON PROPOSED NEW-REVISED RULE ON EMERGENCY RESPONSE; DOCKET NO. OSHA-2007-0073; CFR- 29 CFR 1910; DOCUMENT CITATION- 89 FR 7774; PAGES 7774-8023
DATE: March 14, 2024

Our organization has been advised that the above proposed rule has been published by OSHA in the Federal Register on February 5, 2024 with a comment period scheduled to end on May 6, 2024. I have been assigned by my organization to submit a comment to OSHA on this proposed revision of the Fire Brigade Rule to convert it to the Emergency Response Rule. The new rule will expand its coverage to a wide range of emergency service providers beyond fire brigades and will place many new and expanded administrative tasks on fire departments, fire companies, other emergency service entities and the authorities having jurisdiction over those entities.

In my preliminary review of the document, I note many new administrative tasks and many new assignments for the personnel [firefighters, emergency medical technicians, etc.] that provide these emergency services. I see increased costs for administration, training, equipment inspection, equipment replacement, facility renovation, etc., and no corresponding federal or state sources of funds to pay for same.

We recognize that the health and safety of first responders is a paramount concern. We share your concern for improving safety in the workplace.

However, we need time to review the changes proposed, the tasks created, and the costs associated with those revisions of the rule. We need to determine where we are in compliance and where we need to change our practices to adapt.

We need to identify the source of funds that will enable us to accomplish the goals you are laying out.

We are concerned that we do not have time to make a thorough and detailed statement on this regulatory proposal and that we will not be afforded the necessary time to implement the final version of the rule that will be adopted.

At this time, we would respectfully request a ninety (90) day extension of the comment period and further request that OSHA provide a public hearing scheduled with sufficient notice to enable us make arrangements to appear to provide live comment at such hearing if we elect to do so.

Very truly yours,

Bill Streicher
President

County Fire Coordinators Association, State of New York