



# Charlotte Fire Department

July 22, 2008

U.S. Department of Transportation  
Dockets Management Facility  
1200 New Jersey Avenue, SE  
Washington, DC 20590

DEPT. OF TRANSPORTATION  
DOCKETS  
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Dear Sir or Madam:

The Charlotte Fire Department is a strong advocate for emergency responder safety at roadway incidents. As such, we support the intent of **FR Doc E7-24863** with an additional inclusion. The proposed standard reads:

“All workers within the right-of-way who are exposed either to traffic (vehicles using the highway of purposes of travel) or to construction equipment within the TTC zone shall wear high-visibility safety apparel that meets the Performance Class 2 or 3 risk exposure. A person designated by the employer to be responsible for the worker safety plan shall make the selection of the appropriate class of garment. When uniformed law enforcement personnel are used to direct traffic, to investigate crashes, or to handle lane closures, obstructed roadways, and disasters, safety apparel as described in this Section shall be worn by the law enforcement personnel.”

We support the following inclusion as drafted by the Cumberland Valley Volunteer Firemen’s Association Emergency Responder Safety Institute:

“Firefighters engaged in emergency operations where they are directly exposed to flame, fire and/or hazardous materials shall wear appropriate personal protective equipment as outlined by National Fire Protection Standards, and when they are engaged in all other operations, safety apparel as described in this Section shall be worn by fire and emergency medical services personnel.

Option:

Emergency and incident responders and law enforcement personnel within the TTC zone may wear high-visibility safety apparel that meets the performance requirements of the ANSI/ISEA 207-2006 publication entitled “American National Standard for High-Visibility Public Safety Vests” (see Section 1A.11), or equivalent revisions, and labeled as ANSI 207-2006, in lieu of ANSI/SEA 107-2004 apparel.”

The above inclusion allows us to mitigate roadway emergencies while wearing the most appropriate personal protective equipment for the hazards involved. The Charlotte Fire Department appreciates your consideration to this matter. We will gladly provide additional information or answer any questions.

Sincerely,

Jon B. Hannan  
Fire Chief