



INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS®

ALFRED K. WHITEHEAD
General President

VINCENT J. BOLLON
General Secretary-Treasurer

89502

Friday, July 14, 2000

Department of Transportation
Dockets
400 Seventh Street, SW
Room Plaza 401
Washington, DC 20590

DEPT. OF TRANSPORTATION
DOCKETS
00 JUL 24 PM 3:25

RE: Docket No. FAA-2000-7119. - 22

Dear Madam/Sir:

The International Association of Fire Fighters (IAFF) represents more than 230,000 fire fighters and paramedics, including the vast majority of aircraft rescue and fire fighting (ARFF) personnel at our nation's airports. The IAFF is pleased to provide comments regarding the FAA's proposed rule requiring an automated external defibrillator (AED) on large, passenger-carrying aircraft.

The IAFF agrees with the FAA conclusion that AEDs are a necessary addition to the emergency medical kits. As the notice of proposed rulemaking correctly notes, the most common in-flight medical emergency seems to be cardiac in nature. Further, with domestic air travel expected to grow to close to a billion passengers by the close of this decade, the number of cardiac emergencies can only increase.

In cardiac medical emergencies, the biggest factor in determining survivability is rapid medical intervention. However, when an aircraft is flying miles above the ground and possibly hundreds of miles from the nearest hospital, the likelihood of administering emergency medical services within four minutes is very slim. Thus, the IAFF strongly endorses the need for in-flight AEDs and training crewmembers to administer AEDs and CPR.

While we generally agree with the proposed rule, we feel it omits an important element in its training requirement. The IAFF would like language added to section 121.417, Crewmember Emergency Training, that would require coordinated training between the crewmembers and the ARFF and/or local fire department with EMS capabilities.



Friday, July 14, 2000
Page 2 of 2

During medical emergencies, confusion and lack of coordination can lead to tragic results. Our proposal would ensure that when a medical emergency occurs, both the flight crew and local paramedics have been trained and are familiar with the protocols and procedures to speedily relay the nature of the medical emergency and transfer the patient from the aircraft to an awaiting ambulance. Without coordinated training between crewmembers and the ground EMS personnel, the potential for miscommunication, errors, and confusion during a real medical emergency increases.

For these reasons, we urge the FAA to amend the regulation to include language on direct communication and coordinated training with the ARFF and/or local fire department with EMS capabilities.

Please contact Frederick Nesbitt, IAFF Governmental Affairs Director at 202-824-1581, if you have any questions or comments.

Thank you for your time and attention to this matter.

Sincerely,

Alfred K. Whitehead
General President

AKW/hhk