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Company National Association of State EMS Officials

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Please Indicate Organization Represented (If any) National Association of State EMS Officials

1. a) NFPA Document Title: Standard for Automotive Ambulances NFPA No. & Edition NFPA 1917, 2013 edition

b) Section/Paragraph: 4.17.1 & 4.17.2 & 4.17.3

- 2. Proposal Recommends: (Check one) new text
- revised text
- deleted text

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3. Proposal

4.17 Statement of Exceptions. The entity responsible for final assembly of the ambulance shall deliver with the ambulance ~~either~~ a certification that the ambulance fully complies with all applicable requirements of this standard ~~or, alternatively, including~~ a Statement of Exceptions based on any deviations to this standard that are required to meet the specification of the purchaser- ~~specifically describing each aspect of the completed ambulance that is not fully compliant with the requirements of this standard at the time of delivery.~~

4.17.1 The Statement of Exceptions shall contain, for each deviation to full compliance of the ambulance or missing required item at the time of delivery, the following information:

- (1) A separate listing of the section(s) of the applicable standard for which ~~compliance is lacking~~ a deviation to full compliance has occurred
- (2) A description of the particular aspect of the ambulance where a deviation to full compliance has occurred
- ~~(3) A description of the further changes or modifications to the delivered ambulance that must be completed to achieve full compliance~~
- ~~(4) Identification of the entity that will be responsible for making the necessary post-delivery changes or modifications or for supplying and installing any missing required equipment to the ambulance to achieve full compliance with this standard~~

~~4.17.2 Prior to, or at the time of, delivery of the ambulance, the Statement of Exceptions shall be signed by an authorized agent of the entity responsible for final assembly of the ambulance and by an authorized agent of the purchasing entity, indicating mutual understanding and agreement between the parties regarding the substance thereof.~~

~~4.17.3 An ambulance that is delivered subject to a Statement of Exceptions other than a certification of full compliance shall not be placed in emergency service until the ambulance has been modified as necessary to accomplish full compliance with this standard.~~

4. Statement of Problem and Substantiation for Comment

The NASEMSO cannot support NFPA 1917 with the language as currently written.

The language marked for deletion is too restrictive and will prevent state EMS directors from certifying-permitting vehicles that will operate safely and successfully as ambulances in their respective states.

The language marked for deletion poses significant legal impediments -with respect to the state EMS directors' -ability to certify ambulances in their respective states.

Specifically, section 4.17.3 creates a situation where the ambulance owner has signed/is in possession of a fraudulent document in a state that does not require the NFPA 1917 specification or allows exceptions to it.

5. **X This Proposal is original material.** (Note: Original material is considered to be the submitter's own idea based on or as a result of his/her own experience, thought, or research and, to the best of his/her knowledge, is not copied from another source.)

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