



National Association of State EMS Officials

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May 21, 2014

Daniel W. Buckingham
Branch Chief
Automotive Engineering Branch
Office of Motor Vehicle Management
Federal Acquisition Service
US General Services Administration
1800 F Street, NW
Washington, DC 20405

Dear Mr. Buckingham:

The National Association of State Emergency Medical Services Officials (NASEMSO) members are the state EMS agencies responsible for the overall planning, coordination, and regulation of local and regional EMS agencies. These duties specifically include establishment of ambulance vehicle design requirements as a legislative mandate in the majority of states. NASEMSO is a respected voice for national EMS policy with comprehensive concern and commitment for the development of effective, integrated, community-based, universal, consistent, and safe EMS systems.

Our comments are in reference to the addendum to Change Notice 6 dated 8 April 2014 for FED-STD KKK-A-1822 Federal Specification for the Star-of-Life Ambulance (“KKK specs”). As of 2013, 30 states rely on this specification in part or whole, and as a result changes to the federal standard may have the immediate force of law in many of these states.

The state EMS offices, and in turn NASEMSO, are unanimously concerned about safety in ambulances and their crashworthiness. At the same time, as proponents of system stability and improvement, all potential new requirements must be weighed carefully. All of the changes, corrections, and clarifications are welcome modifications to the KKK spec.

Our sole concern, and concomitant request for delay of implementation, is related to the proposed change to Section 2.2 Other Publications. The deletion of “AMD STANDARD 004 – LITTER RETENTION SYSTEM STATIC TEST” and replacement with “SOCIETY OF AUTOMOTIVE ENGINEERS (SAE), INC., STANDARDS, AND RECOMMENDED PRACTICES: SAE J3027 Ambulance Litter Integrity, Retention, and Patient Restraint” is problematic due to our understanding that this change would become effective July 1, 2014. Depending on when the General Services Administration makes a final decision, what will amount to several weeks of notice about this change is unmanageable from a logistical and financial standpoint.

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This change would force the discontinuation of the use of a particular means of securing the litter to the floor of the ambulance. We fully support the transition to superior devices that will reduce the incidence of litter separation from the retention device during collisions or other untoward events. NASEMSO respectfully requests the delay of this specific change until July 1, 2015. We have significant concerns about cost implications, manufacturer supply issues, and state related compliance issues centered on due process (sufficient notice) and process engineering (changing state inspection practices and documentation).

Thank you for your favorable consideration of this request.

Sincerely,

A handwritten signature in blue ink that reads "Jim DeTienne". The signature is written in a cursive, flowing style.

Jim DeTienne
President