

November 7, 2012

Denise Banks
Director, Automotive
GSA-QMD
2200 Crystal Dr
Arlington, VA 22202

Dear Ms. Banks:

The states' executive branch Emergency Medical Services (EMS) offices have the exclusive authority to license ambulances in their respective states, and in turn, the National Association of State EMS Officials (NASEMSO) is the only nationally representative organization of the state EMS offices. The intended cancellation of U.S. General Services Administration (GSA) KKK-A-1822F August 1, 2007 "Federal Specification for the Star-of-Life Ambulance" specification creates a regulatory dilemma for the states. At least 30 states have incorporated this specification by reference in administrative code. This specification provides a specific benefit to the states, and if retired without adequate lead time for states to identify options and select an alternate approach, will create unnecessary hardship and expense for the states.

Since the early 1970's, the states found favor with the GSA ambulance design specification in large part due to the absence of any other standard, and the inability for states to construct specifications independently. NASEMSO's current understanding is that the intended cancellation date is September 2014. NASEMSO is aware that the specification was created for the purpose of purchasing ambulances with federal funds, and while it has never been a mandate to the states, it serves as a valuable resource as a result of being an active federal publication.

The purpose of this correspondence is to request a delay in cancellation until the end of the 2016 procurement cycle, which would mean a cancellation date of September 30, 2015. This lead time is essential for the states to research alternative specifications, evaluate the impact on the nearly 19,500 local EMS agencies licensed by the states, initiate rulemaking processes, and execute the often time consuming and expensive rule promulgation process. Other downstream effects for which the states must plan and budget is re-engineering their state vehicle inspection processes, training of staff that perform inspections, and interpretation and remediation mechanisms.

It was the unanimous assessment of the NASEMSO Board of Directors that a cancellation date of 2014, while superior to 2013, does not afford sufficient time for states to complete rule promulgation, especially in states whose Legislatures meet every other year or whose processes require more than a year to complete. We recognize that GSA may choose to utilize another set of specifications in the interim; we are simply asking for a delay in cancellation for the states' purposes.

Thank you for your favorable consideration, and please do not hesitate to contact us for further discussion or questions.

Regards,

Jim DeTienne

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