

**Congressional Fire Services Institute · International Association of Fire Chiefs  
International Association of Fire Fighters · National Fire Protection Association  
National Volunteer Fire Council**

April 15, 2016

The Honorable Denise Turner Roth  
Administrator of General Services  
General Services Administration  
1800 F Street, Northwest  
Washington, DC 20006

Dear Ms. Turner Roth:

On behalf of the Congressional Fire Services Institute, International Association of Fire Chiefs, International Association of Fire Fighters, National Fire Protection Association, and National Volunteer Fire Council, we would like to express our concern regarding the General Services Administration's (GSA) continued use of the KKK-A-1822 Ambulance specification (the KKK specification) and urge you to replace the KKK specification with the National Fire Protection Association's (NFPA) *NFPA 1917: Standard for Automotive Ambulances* (NFPA 1917). The NFPA 1917 standard is the only voluntary consensus standard for ambulance design and production to be endorsed by the American National Standards Institute (ANSI). Given the directives contained in the National Technology Transfer and Advancement Act of 1995 (P.L. 104-113) and the Office of Management and Budget Circular A-119, we strongly encourage you to replace the KKK specification with NFPA 1917 at the earliest opportunity.

When the KKK specification was first created, no standards existed in the private sector for the GSA to utilize. We applaud GSA for having taken the initiative to develop this specification, however, the time has come to replace the KKK standard with one that is more data-driven and safety-focused for both EMS providers and patients. Between 1990 and 2009, there were more than 84,000 ambulance accidents which caused nearly 600 fatalities and 29,000 injuries. Our organizations and other fire and EMS-focused organizations noted this disturbing trend in fatal ambulance crashes and pushed for the creation of a new ambulance design to improve survivability for EMS providers and patients.

As an ANSI-accredited standard developing organization with more than 120 years of experience, the NFPA was uniquely positioned to lead this project. Leveraging its experience with the creation of other nationally-recognized and federally-adopted vehicle safety standards, the NFPA convened a broad standard development committee (NFPA 1917 Technical Committee) with experts in disciplines including vehicle engineering, vehicle manufacturing, vehicle regulations, state EMS administration, and both fire-based and non-fire based EMS providers. The committee also included representatives of national organizations including the National Association of State EMS Officials, National Association of EMTs, National EMS Management Association, American Ambulance Association, International Association of Fire Fighters, International Association of Fire Chiefs, and others. This committee created the NFPA 1917 standard through a rigorous consensus-driven process, solicitation of public comment, and

analysis of the latest ambulance crash data from testing performed by the National Institute of Standards and Technology, the National Institute for Occupational Safety and Health, and the U.S. Department of Homeland Security. Ultimately, the broadly diverse NFPA 1917 Technical Committee unanimously approved the NFPA 1917 standard. Due to the inclusion of the latest ambulance safety and crash data in 2015, we are confident that NFPA 1917 is, and will continue to be, the most comprehensive and thorough ambulance standard available and will vastly improve safety for all ambulance occupants.

Following the NFPA 1917 Technical Committee's unanimous approval of the first edition of the NFPA 1917 standard in 2012, new concerns were raised by state EMS officials and private industry. At the request of these groups, the NFPA convened a special meeting where these organizational representatives offered edits on a line-by-line basis. Nearly all of these edits were accepted and included in the second edition of NFPA 1917 in 2015.

Currently, GSA heavily relies on other NFPA vehicle standards in its Category 1901 vehicle Procurement Policies which include usage of NFPA 414, NFPA 1901, NFPA 1906, and NFPA 1912. NFPA 1917 was developed and adopted using identical processes as were utilized in the drafting and adoption of the other above mentioned NFPA standards. Our organizations are sensitive to the GSA's concern that federal adoption of NFPA 1917 could cause difficulties for federal ambulance operations in states that have not yet adopted the NFPA 1917 standard. However, NFPA 1917 meets or exceeds the KKK specification, thus making any NFPA 1917-compliant ambulance also KKK-compliant. Additionally, the KKK specification has been adopted, in whole or in part, by 30 states. Other federal agencies continue to operate KKK specification-compliant ambulances in the remaining 20 states, regardless of their decisions not to adopt the KKK specification. Similarly, we believe federal agencies would be able to operate NFPA 1917-compliant ambulances in all 50 states, regardless of whether each individual state had adopted NFPA 1917. The exemption for federal vehicles from state regulations would continue to protect the federal government's ability to operate NFPA 1917-compliant ambulances in all U.S. states.

While our organizations appreciate GSA's work to continue updating the KKK specification, we are concerned that further delays in GSA adoption of NFPA 1917 will result in more EMS providers and patients being placed at risk while riding in unsafe ambulances owned and operated by the federal government. As you are likely well aware, numerous federal regulations and administrative policies require the federal government to adopt voluntary consensus standards developed by the private sector whenever possible. Given these regulations, our organizations believe the GSA must adopt NFPA 1917 no later than when the current KKK specification expires. If needed, our organizations stand ready and willing to assist the GSA in developing a plan to replace the KKK standard with NFPA 1917.

Thank you again for your attention to this important matter. Our organizations look forward to continuing to work with your office to ensure that all federal employees and members of the public are provided the safest ambulances possible. Federal adoption of NFPA 1917 will protect thousands of EMS personnel and patients who utilize ambulances owned by the federal government on a daily basis.

Sincerely,

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International Association of Fire Chiefs  
National Fire Protection Association  
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