Please indicate in which format you wish to receive your ROP/ROC: ☐ electronic or ☐ paper

Date ____10-10-12____ Name Dia Gainer, MPA Tel. No. (208) 861-4841

Company ____National Association of State EMS Officials (NASEMSO)____________

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Please Indicate Organization Represented (If any) __National Association of State EMS Officials__________________________


   b) Section/Paragraph: 4.17.1 & 4.17.2 & 4.17.3

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

3. Proposal

   4.12.3 The maximum top speed of the ambulance shall not exceed either 77 mph (124 km/hr) or the manufacturer’s maximum service speed rating for the tires installed on the ambulance, whichever is lower.

4. Statement of Problem and Substantiation for Comment

   NASEMSO cannot support section 4.12.3

   - There are states where the legal speed limit is above 77 MPH, including 80 and 85 MPH. Further, in some states an ambulance operating with lights and sirens can legally exceed the posted speed limit by 10 MPH. Therefore, while well intended for roadways with a posted speed limit of 65 MPH or less, a governor set to 77 MPH will actually create a safety issue hazard with the result of ambulances traveling at a much slower speed than the surrounding traffic. Speed should be governed by the states and owners and operators of the ambulances. Since not every chassis manufacturer makes speed governors available, NASEMSO is also deeply concerned about risk aversion expressed by ambulance manufacturers about after market installation and device failure.

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.)

   ☐ This Proposal is not original material: its source (if known) is as follows: ____________________________

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