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*"The American Ambulance Association promotes health care policies that ensure excellence in the ambulance service industry and provides research, education, and communications programs to enable members to effectively address the needs of the communities they serve."*

## Expanded Position Statement Regarding 2013 NFPA 1917 Specification for Automotive Ambulances

September 2012

The American Ambulance Association (AAA) fully supports standards that would increase the durability, dependability, operation and occupant safety of emergency vehicles.

The American Ambulance Association leadership is highly concerned that the current proposed draft of the 2013 NFPA 1917 Specification for Automotive Ambulances contains a number of new requirements that have been arbitrarily adapted from the NFPA 1901 Fire Apparatus Standard. In addition, certain requirements have been added without adequate research or rationale without any scientific basis for the safety or operational efficiency of an EMS agency.

In many cases some of these new requirements may be inappropriate or unsuitable for ambulances. For example:

- Governing the speed of the vehicle through an aftermarket device (if not available as a chassis option), to an arbitrary maximum speed of 77 mph.
- Reducing the minimum quality of the wire, wire loom and electrical components in the vehicle from the level currently required by KKK.
- No requirement for location of modular body access doors. KKK required dual rear doors, as well as a curbside door for an alternate removal of patient in event of emergency (rear collision). NFPA has replaced the KKK secondary (side) door requirement with a minimum 24"x24" means of egress.
- No requirement for minimum useable payload. Customer can establish their own individual remaining useable payload.



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Many of these proposed requirements are vague or not appropriately defined, and will appreciably raise the cost of all vehicles produced under this standard:

- Requirement for a "Do Not Move" warning light in cab to alert driver of "*equipment rack not stowed.*" This provision is not clear, and will allow a wide variety of interpretation by ambulance manufacturers and ambulance inspectors.
- Requirement for seat belt monitoring system for patient compartment seats.
- Requirement for ambulances to meet the existing fire truck standard for sealed waterproof connectors for all lights mounted on body of vehicle. Unlike fire trucks, most wiring connections on an ambulance are on the interior of the vehicle.
- Requiring red/green fire truck chevrons on the rear, as well as specified levels of reflectorized striping on front and both sides of every vehicle.

Some of these proposed requirements may actually increase the liability of ambulance operators:

- Vehicle operating with contents of any cabinet or compartment weighing more than the manufacturer's labeled capacity.
- Vehicle operating in excess of designated 77 mph maximum speed.
- Requirement for purchaser to select any desired location and orientation for both the cot and the primary care seat. This choice can be made without any scientific basis or validation, as well as lacking historic data on mechanisms of injury.
- Vehicle operating with attendant not belted in seat with alarm sounding.
- Operating a vehicle that is not in full compliance with standard. KKK guidelines allowed deviations to meet purchaser's specific needs. However, NFPA mandates that end user has legal obligation to insure that vehicle meets their standard.
  - The ambulance manufacturer is required to provide a document noting all exceptions and differences between customer's specifications and NFPA standards.
  - Purchaser is required to sign this Statement of Exceptions agreeing to "change or modify" their vehicle to achieve full compliance with the NFPA standard *prior to placing the unit in service.*



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The NFPA document is still in draft form. The final revision is expected in September 2012, and an effective date of January, 2013. Based on the information contained in the current draft, it is estimated that the NFPA requirements for additional equipment, features, labeling, testing and documentation could increase the cost of a comparably equipped KKK ambulance by \$5,000-\$11,000.

The American Ambulance Association is currently working with NASEMSO leadership to identify and evaluate all options for automotive ambulance standards that could be utilized following the scheduled demise of the KKK standard in 2013.

The American Ambulance Association leadership strongly believes that the research and testing work currently being done by NIOSH, DHS and NIST will provide us with validated data that will be invaluable in the design standards for ambulances, and we fully support that effort.