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FLORIDA FIRE CHIEFS' ASSOCIATION

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July 31, 2015

Leah Colston
Bureau Chief
Florida Department of Health
Bureau of Emergency Medical Oversight
4052 Bald Cypress Way, Bin #A22
Tallahassee, FL 32399

Chief Colston,

In accordance with Florida Statute 120.54(7) F.S., as the President of the Florida Fire Chiefs' Association, representing all of its fire service based EMS membership; I am hereby petitioning your agency to initiate rulemaking that would amend the most current version of 64J-1.007(3) F.A.C. titled Vehicle Permits. I am seeking a revision to remove the effect of change notices implemented by the United States General Services Administration resulting in significant increases in the cost of ambulance manufacturing costs being passed on to the end users in Florida.

The proposed changes to rule are underlined as follows:

"All transport vehicles permitted to licensed services must meet the vehicle design specifications, except for change notices, color schemes and insignias, as listed in United States General Services Administration (GSA)-KKK-1822, Federal Specifications for Ambulances as mandated by Section 401.35(1)(d), F.S., applicable to the year of the manufacture of the vehicle."

As required, your agency is authorized by statute 401.35(1)(d), F.S., to adopt rules with regard to the design and construction of ambulances for licensed providers in Florida as stipulated below:

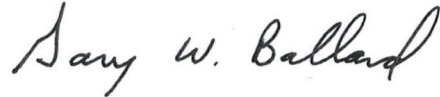
"Ground ambulance or vehicle design and construction at least equal to those most currently recommended by the United States General Services Administration as interpreted by rules of the department."

To better understand the impact of these changes notices by the United States General Services Administration, as of July 2, 2015, there were 2,923 permitted transported ambulances in the State of Florida. It is estimated that the current change notices set forth by the United States General Services Administration will cost an additional \$30,000.00 to \$40,000.00 when ordering a new ambulance. As each ambulance life expectancy differs by agency, the average should fall between 5 and 7 years. For the purposes of determining the overall financial impact, I am using the average of both numbers; \$35,000.00 increase per unit and an average of 6 years life expectancy per ambulance. With these figures, and based on the current number of permitted ambulances, the cost associated with the change notices would equate to

\$102,305,000.00 over a six year period or \$17,050,833.33 per year to the licensed emergency medical service agencies in the State of Florida.

The addition of this change notice will have significant financial impact to ambulance purchases across the state. It is our goal to work through this issue to ensure all EMS agencies in the state can continue to operate in an efficient manner while ensuring the safety of all residents and visitors to this great state we all live in.

Respectfully,

A handwritten signature in cursive script that reads "Gary W. Ballard". The signature is written in black ink and is positioned below the word "Respectfully,".

Gary Ballard
President of the Florida Fire Chiefs' Association