



United States
CONSUMER PRODUCT SAFETY COMMISSION
Washington, D.C. 20207

MEMORANDUM

DATE: June 18, 2003

Done

TO : Linda Glatz, EXPE
Through: Todd A. Stevenson, Secretary, OS
FROM : Martha A. Kosh, OS
SUBJECT: Proposed Collection; Comment Request-Residential Fire Survey

ATTACHED ARE COMMENTS ON THE CH 03-2

<u>COMMENT</u>	<u>DATE</u>	<u>SIGNED BY</u>	<u>AFFILIATION</u>
CH 03-2-1	6/16/03	Carol Kennedy Manager	National Safe Kids Campaign 1301 Pennsylvania Ave, NW Suite 1000 Washington, DC 20004
CH 03-2-2	6/17/03	John Hall	jhall@NFPA.org

*Residential
Fire Survey
comment*

Stevenson, Todd A.

From: Kennedy, Carol [CKennedy@safekids.org]
Sent: Monday, June 16, 2003 2:46 PM
To: Stevenson, Todd A.
Cc: Korn, Alan; Mickalide, Angela; Cody, Beth-Ellen; Giles, Ken P.
Subject: Comment - Residential Fire Survey

June 16, 2003

Linda E. Smith
Division of Hazard Analysis
Directorate for Epidemiology
Consumer Product Safety Commission
4330 East-West Highway
Bethesda, MD 20814

Dear Dr.. Smith,

Thank you for the opportunity to comment on the proposed Residential Fire Survey posted in the Federal Register on April 16, 2003. As you know, the National SAFE KIDS Campaign promotes fire safety in the home through public awareness and consumer education efforts conducted by 600 coalitions and chapters nationwide.

Although the survey will evaluate causes of residential fires and the role of smoke alarms, sprinklers, and fire extinguishers in home fires, we would like to recommend two additional questions related to previous education that would provide valuable data:

- 1) During a fire, were you able to respond to the fire based on information you had learned previously?
- 2) Were you and your family able to carry out a previously-discussed fire escape plan during a "real" fire?

We believe that this information would assist CPSC to further evaluate the effectiveness of consumer fire safety education efforts.

Please do not hesitate to contact me should you have any questions.

Thank you again for the opportunity to comment on this important survey.

Sincerely,

Carol Kennedy

Carol Kennedy, RN, MA
Manager, Programs
National SAFE KIDS Campaign
1301 Pennsylvania Ave., NW
Suite 1000
Washington, DC 20004
(202) 662-0625
Fax: (202) 393-2072

6/16/03

Stevenson, Todd A.

*Reschedule
Fire survey
comment*

From: Smith, Linda E.
Sent: Tuesday, June 17, 2003 8:10 AM
To: Stevenson, Todd A.
Subject: FW: Residential Fire Survey FR Notice



Comments on CPSC
Survey.doc

FYI
Comments in Response to FR Notice, Residential Fire Survey
-----Original Message-----

From: Hall, John [mailto:jhall@NFPA.org]
Sent: Thursday, June 12, 2003 5:53 PM
To: Smith, Linda E.
Cc: Ahrens, Marty; Rohr, Kim; Fahy, Rita; Karter, Mike; Schwartz, Nancy
Subject:

<<Comments on CPSC Survey.doc>>

Linda -- Here are our comments. Hope they're helpful. Feel free to call if you want to discuss further or if any of our comments are not clear.

Good luck! -- John Hall

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Comments on CPSC National Residential Fire Survey

from Marty Ahrens, Kim Rohr, Rita Fahy, Mike Karter, Nancy Schwartz, and John Hall
NFPA

The early references to the time commitment required for the survey are misleading, i.e., the interview will NOT be brief. Suggest some combination of "I will try to keep the interview as brief as possible" and (preferred) a pilot-based estimate of the average or maximum time that will be required. That way you'll get informed consent to participate and your results won't be compromised by a lot of people quitting part-way through or shading their answers out of annoyance over an unexpectedly lengthy process.

We assume this will be run as a computer prompted, menu-driven telephone survey. Otherwise, there are some complicated branching rules that are ripe for interviewer error. Also, some of the "please, specify" blanks are too short for answers, if this were a hard-copy form.

Q.2 The first "the" in the question is a typo.

Your definition of "fire" does not include either of the concepts of "unwanted" and "uncontrolled". Strictly speaking, a controlled fireplace fire or cooking with a fueled cooking device would satisfy the definition.

Do you want to include or exclude a car fire? In the garage? In the driveway? Parked on the street? In a group parking lot? In a separate parking structure? On the road away from home? Whatever you want, you'll want to clarify the definition and instruct the interviewers.

Do you want to include or exclude a brushfire or wildfire in the area? (Consider the phrase "around your home", which need not mean limited to your yard or your complex.) How close? This could be significant in California.

Do you really want an incident with smoke but no flames? Again, ordinary cooking can create such a condition. So can electrical overheat conditions that never become fires, and those are specifically excluded from the definition of "fire" in NFPA 901.

If you do want to include these marginal conditions, do you want to ask all your questions about every fire? How will you know which type of fire (or fire-like condition) they are referring to if they report on more than one fire?

Q.5. Your first probe may suggest by omission that you really don't want to include something smoking but not flaming on the stove or in the oven. Clarify. If you want something smoking, can you be sure you've excluded visible fumes not associated with combustion, e.g., a chemical oven cleaner application. Also, why limit to stove or oven, instead of saying "stove or any cooking appliance"?

If you want the third probe to refer to clothing on a person, need to say so.

Your fourth probe includes a phrase, "smoking mattress," that struck one of us odd, as if the mattress was engaged in smoking a cigarette. We assume "smoking" is meant to explain the less-familiar term of "smoldering," but it might help to rephrase so that's clear. Also, smoldering can happen with other fabrics, like clothes in a dryer. Suggest: "Smoldering fabric, that is, smoke with no flame involving a mattress, rug, couch or other fabric".

Q.7. Do you plan to infer day of the week from month and date? If they can't remember the date but can remember the day, would the latter be useful to you anyway? Do you even need the date for analysis if you have the month and day?

Q.8. Might help to change "Enter Time" to "Enter Estimated Time" as a reminder to everyone that these are estimates. Can you handle a range as an answer?

Q.9. Clarify whether "in your home" is meant to include exterior features and surfaces, including porch, balcony, deck, roof, exterior walls, outsides of windows and doors, etc. Even a garage might be unclear to some.

Also, if you want people to specify "some other place," it might save time to list, and assign codes in advance to, the major examples, including yard and shed.

Q.12. If you don't read the list, how can you be sure respondents will specify finished vs. unfinished attic or basement? If they are finished, do you want them coded in terms of use (e.g., bedroom, rec room), which would involve a different code on your list? Or would it be better to list only the unfinished areas separately, list the finished ones as what they are, and probe for the necessary details.

If possible, there would be value in splitting adult bedrooms from child bedrooms, as this is useful in analysis of issues such as detector response, child-playing as a cause, etc.

What about hallways, entry ways, and means of egress? What about fires starting in crawl spaces or substructure spaces of a manufactured home? What about fires starting on exterior surfaces? Note that some people will report a concealed-space fire as such and others will assign it to the adjacent room where it was first seen; you may need probes or definitions if you want consistency.

Q.14. The question suggests this is about cause, but the choices are all heat sources. Intentional or playing fires tend to be identified by behavioral cause first and may not have a known heat source. This may not require a change, but your interviewers need to know how to handle such a response.

Note under "Cooking" that you're interested in unattended cooking as well as fires due to equipment problems, because your examples may steer interviewers toward the latter only.

You may need a longer list of examples under “Electrical wiring or lighting”, e.g., other cords, plugs, switches, fuses, circuit breakers, light bulbs vs. light fixtures (can’t be sure “lighting” will mean both to everyone).

Forest fires and lightning are quite different and should be split.

The listing for “Lighter – cigarette or multipurpose” could be misread to mean cigarettes are to be listed with lighters. Rephrase as “Cigarette lighter or multipurpose lighter”.

Is “other open flame or spark” worth a separate code if you’ve already got matches, lighters, and candles? Consider either “torch” by itself or, going a different way, “other or unknown-type open flame or spark,” so you can sort the partial unknowns.

It would be useful to separate dryers and electronic equipment (or just TVs) from the omnibus “other appliances and equipment” category, if you have room.

Why specify spread of fire from another household? Why not spread of fire from another building or property?

Q.15 You might want to ask this question regardless of the answer in Q.14 or at least expand it to include all appliance and equipment choices, e.g., the latchkey child who tries to cook for himself or use electronic equipment for herself.

Q.16. The question sounds counter-intuitive, since one doesn’t normally think of the heat source as something that also catches fire. (Even an appliance may have one part that’s the heat source and another – the housing – that may catch fire.) Change to “What caught fire?”, combine Q.17 and 17a, and add “Appliance housing of the heat source” to both lists.

Q.17 and 17a. Change first listing to “Bedding (including blankets), mattresses.” Blankets can be used on chairs or couches, and that’s not what you want.

Because both have long lists in alphabetical order, it’s not clear what is meant to be excluded in the two “Other” entries. Reword as “Fabrics or textiles other than clothing, bedding, or furniture (e.g., towel)” and “Non-upholstered furniture” [if that’s even worth its own category].

Drapes are window treatments, not wall coverings. Give drapes and curtains their own category.

You mean wire insulation, not wiring.

Q.20. In the mapping instructions before Q.20, you want to autopunch yes in Q25 if Q17 or 17a = 4 OR 5 (cooking grease, etc.) and make similar change to the next line of instructions.

In the list for Q.20, where do you put a chimney for a fireplace or a chimney whose purpose is not known?

“Other fixed local or room heater” could be read as “Fixed local heater or room heater” which would include portable heaters. Suggest instead “Fixed space heater excluding heating stove”.

Q.21. Why are pellets put with coal? Aren't pellets often a form of wood?

Q.23. Consider asking about age of equipment, even if it's only a few ranges.

How does audio-visual equipment differ from home entertainment and home office equipment? Seems like a small and ambiguous category you don't need.

You've got torch listed here and under heat source earlier. Is that going to complicate the analysis? Remember that the British use “torch” to mean a flashlight. May need to clarify if respondent sounds British or is ambiguous in response.

All the items listed here are heat sources – with the possible exception of toys, which could use an example or two for clarity. Maybe clarify in question that you mean “provided the heat to start the fire” because “involved in starting the fire” is broader, e.g., the TV fell over and the candle on it started a fire.

Q.24. Consider adding “acetylene” for torches.

Q.31. Do you want to ask about indicators that the equipment was working properly just before fire began, or more generally before the fire? Consider adding a list of indicators – e.g., smell, lights dimming or flickering, overheating you can feel, etc.

Also, does this question make as much sense if the item is a candle? Your flow patterns will ask the question for candle fires. Will people understand what “working properly” means in that context?

Q.32. Not sure that the flows will bring the right people to this question. For example, why are you uninterested in the ignition of flammable liquids, gases, vapors, if equipment seemed to be working properly? A furnace pilot light igniting gasoline vapors can easily occur when there's nothing wrong with the furnace.

Q.35a. This assumes fires will be discussed from earliest to most recent. Q.7. queues fires from most recent to earliest. Need to reconcile.

Q.36. This question should identify the presence of heat detectors and CO detectors, if only to make sure they are excluded from subsequent questions (assuming you want to exclude them).

Q.39c. What about plug-in smoke alarms? Is that an AC “connection” or do you need another choice?

Q.42. Suggest a shorter, clearer question: “How was fire discovered?”. This is used in the UK. Also, change “smoke detector alarm went off” to “smoke alarm activated”; technical jargon is okay since you’re not reading it. What if a heat detector or CO detector gave first notification? Consider whether feeling the heat or smoke irritation to eyes will have a clear place for coding if they provide first notification.

Q.42b. There might be a category between answers 2 and 3: “Considerable smoke but still limited to only part of room”. The idea is that “a little smoke” may cut off at a much lower threshold than we would use.

Q.42d. Do you want to deal with doors that are not fully closed but are mostly closed, i.e., not snug in the door jamb, but abutting the jamb?

Q.49a. Some may not be familiar with the 10-year battery detector and may think you mean a 10-year-old ordinary battery. Rephrase for clarity, e.g., Did this detector have a battery designed to last 10 years?

Q.50a and Q.58. It would be useful to ask whether detectors or sprinklers are connected to a monitoring service or system.

Q.50b. Why is the first fire extinguisher question numbered as part of the smoke detector question? Why not make Q50b into Q51 and Q51 into Q51a?

Q.54. Might consider another choice, namely, extinguisher reduced the fire but then ran out, allowing fire to grow again. This also should be reflected in Q.55, which seems to anticipate only an empty extinguisher or a fire too big for a fully charged extinguisher, which leaves out a fire that overwhelms a partially filled extinguisher.

Q.56. If the answer is Yes, you might want to ask how many extinguishers they tried to use.

Q.59a. The phrase “in the room” might be subject to interpretation. A hallway sprinkler head would cover much of the adjoining room(s), subject to walls and doors.

Q.60. This question may be hard to answer for a fire that begins on the exterior or in a concealed space.

Q.62. Same as Q.54, i.e., a sprinkler need not be all or nothing, and it could reduce the fire before running out, for whatever reason.

Q.65. Consider separating out flour if its effectiveness in suppression is sufficiently different from other common home products.

Consider distinguishing bringing tap water to fire vs. bringing burning item to tap water, and, more generally, you may move the item but not outside.

Q.67. This should be preceded by asking whether the fire department was called and if so, how (e.g., from phone in home, from phone elsewhere, by neighbor, by passerby, by monitored system overseers).

Q.72. The preamble to this question could come across as cold or brusque. The respondents may still be traumatized by the harm done to a loved one. Consider more sensitive wording and an option to stop this part of the questioning if it becomes too painful to continue.

Q.78. Add to question "as a result of the fire." Some of these injuries could have applied before the fire. (Try to find a young boy without cuts or bruises.)

Q.80. Consider asking about pre-existing conditions that might have contributed to any decision to reduce activity.

Q.81. Change "duplex" to "two-family dwelling including duplex." Many people use "duplex" only for buildings where the families live side by side, not for homes where they live top and bottom.

Clarify choice 4 as: "Apartment or flat in a building containing 3 or more housing units". More people will recognize the term "apartment" than the more abstract sounding phrase that appears alone there now.

Q.82. Consider whether people might be more easily able to tell you what year the building was built than to convert that year to an age.

Q.85. This question needs to be clarified regarding heat detectors and CO detectors, like its earlier counterpart.

Q.87. Same comment about monitored systems cited earlier.

Q.94. Add a break for 15 to 17 or 15 to 20, to capture the age breaks defining juvenile or child used most places.

Q.98. Consider whether this should follow Q.99.

Q.99. Do you consider someone from India to be black, Asian, or other? Will "Native American" be recognized by everyone? Isn't Alaskan native a subset of Native American? Canada uses the term "First Nations"; aboriginal is sometimes applied; and "American Indian" may be deprecated but it may also be clear to some people who aren't attuned to the listed choices.

Q.100. How often do you have to smoke to be a "smoker"?