



Public Comment No. 19-NFPA 1-2022 [Global Input]

Note for FCC-OCP:

The FCC-OCP requested via CI-5 for the correlating committee to add the following definition:

Sprinkler System. A system, commonly activated by heat from a fire and discharges water over the fire area, that consists of an integrated network of piping designed in accordance with fire protection engineering standards that includes a water supply source, a water control valve, a waterflow alarm, and a drain. The portion of the sprinkler system above ground is a network of specifically sized or hydraulically designed piping installed in a building, structure, or area, generally overhead, and to which sprinklers are attached in a systematic pattern. [NFPA 13 -3.3.206] (FCC-OCP)

The correlating committee has not added as this definition is limited in scope and does not address all types of sprinkler systems that are in addressed NFPA 1, including 13D, which do not require waterflow alarms for all systems. The correlating committee is requesting that the OCP technical committee review this definition to ensure that it is applicable to all types of sprinkler systems permitted by NFPA 1.

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
1_A2023_FCC_AAC_CorrelatingNoteNo11.pdf	1_Correlating Note No. 11	

Statement of Problem and Substantiation for Public Comment

NOTE: The following CC Note No. 11 appeared in the First Draft Report on FCC-OCP CI-5.

The correlating committee has not added as this definition is limited in scope and does not address all types of sprinkler systems that are in addressed NFPA 1, including 13D, which do not require waterflow alarms for all systems. The correlating committee is requesting that the OCP technical committee review this definition to ensure that it is applicable to all types of sprinkler systems permitted by NFPA 1.

Related Item

- Committee Input No. 5

Submitter Information Verification

Submitter Full Name: CC ON FCC-AAC

Organization: NFPA

Street Address:

City:

State:

Zip:

Submittal Date: Tue Jan 18 09:25:17 EST 2022

Committee: FCC-OCP

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-48-NFPA 1-2022](#)

Statement: This addresses the concerns raised by the FCC-AAC in CN-11. The two new extracted definitions address both definitions used by NFPA 13, 13R and 13D. NFPA 13R extracts the definition from 13.



Correlating Committee Note No. 11-NFPA 1-2021 [Detail]

Submitter Information Verification

Committee: FCC-AAC

Submission Date: Thu Oct 07 14:54:35 EDT 2021

Committee Statement

Committee Statement: Note for FCC-OCP:

The FCC-OCP requested via CI-5 for the correlating committee to add the following definition:

Sprinkler System. A system, commonly activated by heat from a fire and discharges water over the fire area, that consists of an integrated network of piping designed in accordance with fire protection engineering standards that includes a water supply source, a water control valve, a waterflow alarm, and a drain. The portion of the sprinkler system above ground is a network of specifically sized or hydraulically designed piping installed in a building, structure, or area, generally overhead, and to which sprinklers are attached in a systematic pattern. [NFPA 13 -3.3.206] (FCC-OCP)

The correlating committee has not added as this definition is limited in scope and does not address all types of sprinkler systems that are in addressed NFPA 1, including 13D, which do not require waterflow alarms for all systems. The correlating committee is requesting that the OCP technical committee review this definition to ensure that it is applicable to all types of sprinkler systems permitted by NFPA 1.

Ballot Results

✔ **This item has passed ballot**

19 Eligible Voters

2 Not Returned

17 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

Not Returned

Baldassarra, Carl F.

Hollinger, David W.

Affirmative All

Bush, Kenneth E.

Butts, Chris L.

Clary, Shane M.

Davidson, Robert J.

Denhardt, John August

Gallo, Ernest J.

Garriss, Marvin Dwayne

Hawthorne, Edward M.

Hugo, Jeffrey M.

Koffel, William E.

Nicolello, Kelly T.

O?Brian, Michael

Palazini, Wade

Ramo, Leonard J.

Stashak, Catherine L.

Tyree, David P.

Tyree, Jr., Kenneth Earl



Public Comment No. 29-NFPA 1-2022 [Section No. 13.1.6]

13.1.6

Detailed records documenting all systems and equipment inspection, testing, and maintenance shall be ~~both of~~ required to meet all of the following:

- (1) ~~Kept~~ Maintained by the property owner
- (2) Made available upon request for review by the AHJ

Statement of Problem and Substantiation for Public Comment

Cleans up the language and correlates with requirements in NFPA 25

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 30-NFPA 1-2022 [Section No. 13.1.6]	

Related Item

- FR-12

Submitter Information Verification

Submitter Full Name: Kevin Hall
Organization: American Fire Sprinkler Association
Affiliation: American Fire Sprinkler Association
Street Address:
City:
State:
Zip:
Submittal Date: Thu Feb 10 09:36:41 EST 2022
Committee: FCC-OCP

Committee Statement

Committee Action: Rejected
Resolution: Based on the changes made to 13.1.6, extracting the reporting section of NFPA 25, this change is not necessary.



Public Comment No. 30-NFPA 1-2022 [Section No. 13.1.6]

13.1.6–

Detailed records documenting all systems and equipment inspection, testing, and maintenance shall be both of the following:

- Kept by the property owner
Made available upon request for review by the AHJ

Records

13.1.6.1

Records shall be made for all inspections, tests, and maintenance of the system and its components. [25 :4.3.1]

13.1.6.1.1

Records shall be maintained by the property owner. [25 :4.3.1.1]

13.1.6.1.2

Records shall be permitted to be stored and accessed electronically. [25 :4.3.1.2]

13.1.6.2

Records shall include the following:

- (1) The procedure/activity performed (e.g., inspection, test, or maintenance)
- (2) The organization that performed the activity
- (3) The required frequency of the activity
- (4) The results and date of the activity
- (5) The name and contact information of the qualified contractor or owner, including lead person for activity

[25 :4.3.2]

13.1.6.3

Records shall be made available to the authority having jurisdiction upon request. [25 :4.3.3]

13.1.6.4

As-built system installation drawings, hydraulic calculations, original acceptance test records, and device manufacturer's data sheets shall be retained for the life of the system. [25 :4.3.4]

13.1.6.5

Subsequent records shall be retained for a period of 1 year after the next inspection, test, or maintenance of that type required by the standard. [25 :4.3.5]

Statement of Problem and Substantiation for Public Comment

The record keeping requirements found in NFPA 25 would be appropriate to be extracted in this section. As NFPA 25 is the owner's document, having these requirements contained within NFPA 1 makes them enforceable by the fire code official. Additionally, it will provide needed guidance on the information required to be included in ITM records as well as how long those records should be maintained.

Related Public Comments for This Document

Related Comment

Public Comment No. 29-NFPA 1-2022 [Section No. 13.1.6]

Related Item

- FR-12

Relationship

Two options proposed for this section

Submitter Information Verification

Submitter Full Name: Kevin Hall

Organization: American Fire Sprinkler Association

Affiliation: American Fire Sprinkler Association

Street Address:

City:

State:

Zip:

Submittal Date: Thu Feb 10 09:42:05 EST 2022

Committee: FCC-OCP

Committee Statement

Committee Action: Accepted

Resolution: SR-41-NFPA 1-2022

Statement: The record keeping requirements found in NFPA 25 would be appropriate to be extracted in this section. As NFPA 25 is the owner's document, having these requirements contained within NFPA 1 makes them enforceable by the fire code official. Additionally, it will provide needed guidance on the information required to be included in ITM records as well as how long those records should be maintained.



Public Comment No. 22-NFPA 1-2022 [Section No. 13.7.1.5.5]

13.7.1.5.5*

Fire alarm systems classified as chronic-nuisance-alarm-prone systems shall comply with the following:

- (1) The system shall be inspected by qualified inspection, testing, and service personnel, in accordance with *NFPA 72*, ~~from an approved fire alarm service company~~ for the cause of the nuisance alarms.
- (2) Corrective action shall be taken ~~by the approved fire alarm service company~~ to address the cause of the nuisance alarms.
- (3) A report, completed by the ~~fire alarm service company~~ person correcting, shall be provided to the AHJ ~~by the owner of the fire alarm system~~ as to the cause and corrective action taken to mitigate future nuisance alarms from the fire alarm system.

Statement of Problem and Substantiation for Public Comment

1. There may be others that will be used to determine why the fire alarm is causing nuisance alarms as worded it limits the AHJ to a fire alarm service company. This was discussed in the TG and TC meeting, engineers or others may be diagnosing the issue.
2. This requires the approved fire alarm service company to correct an issue that may not be one they can correct. What if the issue is a bad neutral, requires a wall to be built, require work on an HVAC system. I am more concerned that the issue is corrected.
3. Correlated with the other proposed changes that whomever corrects the issues writes a report.

The proposed changes broadens who can diagnose the issue and get it corrected.

Related Item

- FR100

Submitter Information Verification

Submitter Full Name: Steven Sawyer

Organization:

Street Address:

City:

State:

Zip:

Submittal Date: Tue Jan 18 09:38:22 EST 2022

Committee: FCC-OCF

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-50-NFPA 1-2022

Statement: The proposed changes broaden who can diagnose the cause of chronic-nuisance-alarms and get them corrected. NFPA 72 is still referenced and does require qualified personnel. The current language limits who can correct issues not related to the fire alarm system, such as building a wall or working on HVAC systems. Item 3 clarifies who the report goes to and who is responsible for providing it.

The proposed changes broadens who can diagnose the issue and get it corrected.



Public Comment No. 47-NFPA 1-2022 [New Section after 13.7.1.8.2]

Smoke alarm prohibition

Add a new section:

13.7.1.8.3 The installation of smoke alarms in other than a residential occupancy shall be prohibited unless approved by the AHJ.

Statement of Problem and Substantiation for Public Comment

Often smoke alarms are installed in commercial buildings by building owners/tenants in lieu of a fire alarm system. Smoke alarms are an inexpensive, widely available, simply installed, and inferior option to a fire alarm system (smoke detectors and notification appliances). In previous editions, UL 217's scope limited the use of smoke alarms to residential units only.

Rationale:

1. Alarms provide a false sense of security because it is not a fire alarm system designed or intended to protect commercial property
2. Multiple alarms in an occupancy often are not interconnected, and thus each device operates as a single station device
3. Alarms are not required to be professionally tested, inspected or maintained in accordance with NFPA 72 Chapter 14 unless it is connected to a protected premises system. Testing, inspection, and maintenance of smoke alarms is the responsibility of the building owner/tenant in NFPA 72 not a qualified individual. It is unlikely that the alarms will be maintained in accordance with the manufacturer's recommendations.
4. Alarms are required to be monitored or supervised; therefore this no notification that the alarm has malfunctioned, or no automatic fire department notification.
5. There are no requirements for occupant action (evacuation and call 911) if the alarm sounds.

Related Item

- PI 129

Submitter Information Verification

Submitter Full Name: H Jacob Nunnemacher

Organization:

Street Address:

City:

State:

Zip:

Submission Date: Thu Feb 24 11:29:23 EST 2022

Committee: FCC-OCP

Committee Statement

Committee Action: Rejected

Resolution: The term "residential occupancy" does not align with NFPA 1. There are residential occupancies like day-care homes, board and care, or detention and correction that may allow the use of smoke alarms. The submitter should work on wording that addresses the specific occupancies in NFPA 1.



Public Comment No. 44-NFPA 1-2022 [Section No. 20.1.5.6.1]

20.1.5.6.1

Assembly occupancies having an occupant load more than 99, shall be provided with a minimum of one trained crowd manager or crowd manager supervisor. Where the occupant load exceeds 250, additional trained crowd managers or crowd manager supervisors shall be provided at a ratio of 1 crowd manager or crowd manager supervisor for every 250 occupants, unless otherwise permitted by one of the following:

- (1) This requirement shall not apply to assembly occupancies used exclusively for religious worship with an occupant load not exceeding 500.
- (2) The ratio of trained crowd managers to occupants shall be permitted to be reduced where, in the opinion of the AHJ, the existence of an approved, supervised automatic sprinkler system and the nature of the event warrant.

[**101:12.7.6.1**; **101:13.7.6.1**]

Statement of Problem and Substantiation for Public Comment

The way the current language is written, states assembly occupancies with 50 or more occupant loads need a crowd manager. It has been difficult to enforce these small facilities with maybe 55 or 70 occupant loads as the management and staff turn-over is frequent. We may enforce someone get it and then they are not there the following year. This causes the business to spend more money on training and the AHJ to continuously issue violations or have to make alternative measures to this section. These buildings also are not required to have fire detection or fire protection systems which is another item a crowd manager could be responsible for. With such a low occupant load and small facility, the tasks for a crowd manager are not many. The proposal for more than 99 persons is also in-line with the requirement for panic hardware in such occupancies.

Related Item

- When available, NFPA 101 12.7.6.1 and 13.7.6.1

Submitter Information Verification

Submitter Full Name: Tommy Demopoulos
Organization: Tamarac Fire Rescue
Street Address:
City:
State:
Zip:
Submittal Date: Thu Feb 24 04:21:37 EST 2022
Committee: FCC-OCF

Committee Statement

Committee Action: Rejected
Resolution: This language is extracted from NFPA 101. The submitter should suggest changes within NFPA 101 instead of NFPA 1. Additionally, this is new material - it is not related to any First Revisions or Public Inputs from the first draft.



Public Comment No. 24-NFPA 1-2022 [New Section after 22.9.5.2]

22.9.6 Other Batteries Technologies. Other battery technologies shall be handled and stored in accordance with NFPA 855.

Statement of Problem and Substantiation for Public Comment

Wrecking and salvage yards are dealing with electric and hybrid vehicles and the code should have provisions on how to deal with them safely.

Related Item

- PI64 • CI10

Submitter Information Verification

Submitter Full Name: Steven Sawyer

Organization:

Street Address:

City:

State:

Zip:

Submittal Date: Tue Jan 18 10:15:57 EST 2022

Committee: FCC-OCP

Committee Statement

Committee Action: Accepted

Resolution: SR-51-NFPA 1-2022

Statement: Wrecking and salvage yards are dealing with electric and hybrid vehicles and the code should have provisions on how to deal with them safely.



Public Comment No. 38-NFPA 1-2022 [Section No. 36.1]

36.1 General.

36.1.1

Telecommunication facilities- ~~shall~~ , including associated stationary standby power systems, shall comply with NFPA 76.

36.1.2

Information technology equipment and information technology equipment areas, including associated stationary standby power systems, shall comply with NFPA 75.

Statement of Problem and Substantiation for Public Comment

The 2020 editions of NFPA 75 and 76 were updated to include fire protection requirements for battery based standby power systems that were previously addressed in 75 and 76 via references to NFPA 1. It would be helpful to emphasize in Chapter 36 that NFPA 75 and 76 contain suitable requirements for standby power systems specifically adapted to these occupancies.

Related Item

- PI-126

Submitter Information Verification

Submitter Full Name: Richard Kluge

Organization: Ericsson

Affiliation: ATIS

Street Address:

City:

State:

Zip:

Submittal Date: Thu Feb 17 13:32:26 EST 2022

Committee: FCC-OCP

Committee Statement

Committee Action: Rejected

Resolution:

NFPA 76 and 75 address multiple systems including stationary standby power systems. Specifying only one of those systems in this section wouldn't be appropriate. Conflicts between 76/75/855 need to be addressed by those committees. Once that occurs, Ch 36 can look at further revisions.



Public Comment No. 14-NFPA 1-2022 [Section No. A.13.2.3.4.3]

A.13.2.3.4.3

After the tragic February 23, 1991, One Meridian Plaza fire, the maximum standpipe pressure requirements were adjusted to better reflect national fire service operating pressures based on the recommendations found in USFA-TR-049, "Highrise Office Building Fire One Meridian Plaza." The intent of 13.2.3.4.3 is to afford the AHJ the option of utilizing those higher pressures adopted in NFPA 14 only where they do not exceed the current 175 psi (12.1 bar) maximum for hose valve outlet pressure.

For Class I standpipes, a pressure-regulating device should not be required where the static pressure of a hose connection exceeds 175 psi (12.1 bar), provided that downstream components, including fire hose and fire nozzles of the responding fire suppression company, are rated for the anticipated static and residual pressures, subject to approval by the AHJ. Due to the inherent safety issues of higher pressure, the AHJ should determine that the fire department is trained in the use of higher pressure hose and nozzles. [14 :A.7.2.3]

Statement of Problem and Substantiation for Public Comment

There is annex language in NFPA 14 that is appropriate to this new section. Where a fire department is not limited to 175 psi and all of their equipment is rated at a higher pressure, then the pressure at the hose connection should be permitted to exceed 175 psi.

Related Item

- FR-132

Submitter Information Verification

Submitter Full Name: Kevin Hall

Organization: American Fire Sprinkler Association

Affiliation: American Fire Sprinkler Association

Street Address:

City:

State:

Zip:

Submittal Date: Mon Jan 10 15:52:02 EST 2022

Committee: FCC-OCP

Committee Statement

Committee Action: Rejected

Resolution: The proposed text introduces language which is unnecessary and is referencing a section applying to new systems within NFPA 14 and there may be a conflict with the sections addressing existing systems within NFPA 1.