



**First Revision No. 6590-NFPA 101-2024 [ Section No. 12.1.6 ]**



**12.1.6** Minimum Construction Requirements.

Assembly occupancies shall be limited to the building construction types specified in Table 12.1.6, based on the number of stories in height as defined in 4.6.3, unless otherwise permitted by the following (see 8.2.1):

- (1) This requirement shall not apply to outdoor grandstands of Type I or Type II construction.
- (2) This requirement shall not apply to outdoor grandstands of Type III, Type IV, or Type V construction that meet the requirements of 12.4.10.
- (3) This requirement shall not apply to grandstands of noncombustible construction supported by the floor in a building meeting the construction requirements of Table 12.1.6.
- (4) This requirement shall not apply to assembly occupancies within mall structures in accordance with 36.4.4.

Table 12.1.6 Construction Type Limitations

Construction Type	Sprinklered <sup>a</sup>	Stories Below	Stories in Height <sup>b</sup>				
			1	2	3	4	≥5
I (442) <sup>c, d, e</sup>	Yes	X	X	X	X	X	X
	No	NP	X4	X4	X4	X4	X4
I (332) <sup>c, d, e</sup>	Yes	X	X	X	X	X	X
	No	NP	X4	X4	X4	X4	X4
II (222) <sup>c, d, e</sup>	Yes	X	X	X	X	X	X
	No	NP	X4	X4	X4	X4	X4
II (111) <sup>c, d, e</sup>	Yes	X1	X	X	X	X3	NP
	No	NP	X4	X4	X4	NP	NP
II (000)	Yes	X2	X	X4	NP	NP	NP
	No	NP	X4	NP	NP	NP	NP
III (211) <sup>d</sup>	Yes	X1	X	X	X	X3	NP
	No	NP	X4	X4	X4	NP	NP
III (200)	Yes	X2	X3	X4	NP	NP	NP
	No	NP	X4	NP	NP	NP	NP
IV (2HH)	Yes	X1	X	X	X	X3	NP
	No	NP	X4	X4	X4	NP	NP
V (111)	Yes	X1	X	X	X	X3	NP
	No	NP	X4	X4	X4	NP	NP
V (000)	Yes	X2	X3	X4	NP	NP	NP
	No	NP	X4	NP	NP	NP	NP

X: Permitted for assembly of any occupant load.

X1: Permitted for assembly of any occupant load, but limited to one story below the level of exit discharge.

X2: Permitted for assembly limited to an occupant load of 1000 or less, and limited to one story below the level of exit discharge.

X3: Permitted for assembly limited to an occupant load of 1000 or less.

X4: Permitted for assembly limited to an occupant load of 300 or less unless otherwise permitted by 12.3.5.3(1).

NP: Not permitted.

<sup>a</sup>Protected by an approved, supervised automatic sprinkler system in accordance with Section 9.7 in the following locations:

- (1) Throughout the story of the assembly occupancy
- (2) Throughout all stories below the story of the assembly occupancy, including all stories below the level of exit discharge
- (3) In the case of an assembly occupancy located below the level of exit discharge, throughout all stories intervening between the story of the assembly occupancy and the level of exit discharge, including the level of exit discharge

<sup>b</sup> See 4.6.3.

<sup>c</sup>Where every part of the structural framework of roofs in Type I or Type II construction is 20 ft (6100 mm) or more above the floor immediately below, omission of all fire protection of the structural members is permitted, including protection of trusses, roof framing, decking, and portions of columns above 20 ft (6100 mm).

<sup>d</sup>In open-air fixed seating facilities, including stadia, omission of fire protection of structural members exposed to the outside atmosphere is permitted where substantiated by an approved engineering analysis.

<sup>e</sup>Where seating treads and risers serve as floors, such seating treads and risers are permitted to be of 1-hour-fire-resistance-rated construction. Structural members supporting seating treads and risers are required to conform to the requirements of Table 12.1.6. Joints between seating tread and riser units are permitted to be unrated, provided that such joints do not involve separation from areas containing high hazard contents and the facility is constructed and operated in accordance with 12.4.3.

## Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Tue Jul 16 17:12:59 EDT 2024

## Committee Statement

**Committee Statement:** The revision to note X4 in Table 12.1.6 eliminates a conflict with 12.3.5.3(1).

**Response Message:** FR-6590-NFPA 101-2024



## First Revision No. 6650-NFPA 101-2024 [ New Section after 12.1.7.4 ]

### 12.1.7.5

The occupant load of fixed seating shall be the total of the number of fixed seats, wheelchair spaces, and companion seats.

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Thu Jul 18 17:20:29 EDT 2024

### Committee Statement

**Committee Statement:** The revision clarifies that the occupant load of fixed seating areas includes wheelchair spaces and seats for companions. The committee requests that the correlating committee modify Table 7.3.1.2 to reflect this revision and delete this paragraph.

**Response Message:** FR-6650-NFPA 101-2024



## First Revision No. 6589-NFPA 101-2024 [ Section No. 12.2.2.3 ]

### 12.2.2.2.3

Any door in a required means of egress from an area having an occupant load of ~~400~~ 50 or more persons shall be permitted to be provided with a latch or lock only if the latch or lock is panic hardware or fire exit hardware complying with 7.2.1.7, unless otherwise permitted by one of the following:

- (1) This requirement shall not apply to delayed-egress electrical locking systems as permitted in 12.2.2.2.5.
- (2) This requirement shall not apply to sensor-release of electrical locking systems as permitted in 12.2.2.2.6.

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Tue Jul 16 16:23:05 EDT 2024

### Committee Statement

**Committee Statement:** Building Code, section 1010.2.9 require a Group A and E occupancies with 50 or more occupants be provided with panic hardware. This is a difference in the Building and Fire codes that lead to confusion by plans examiners and contractors/business owners. Since the Building Code that shows 50 persons is more stringent, than this section is irrelevant as their code will take precedent since it is more stringent. Recommending to have both codes mirror each other. The threshold for assembly occupancies is 50 occupants and all new assembly occupancies should be provided with panic hardware.

**Response Message:** FR-6589-NFPA 101-2024

[Public Input No. 51-NFPA 101-2024 \[Section No. 12.2.2.2.3\]](#)



## First Revision No. 6577-NFPA 101-2024 [ Section No. 12.2.2.2.6 ]

### 12.2.2.2.6

Doors in the means of egress shall be permitted to be equipped with an approved ~~access control~~ sensor-release of electrical locking system complying with 7.2.1.6.2, and such doors shall not be locked from the egress side when the assembly occupancy is occupied. (See 7.2.1.1.3.)

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Tue Jul 16 11:41:53 EDT 2024

### Committee Statement

**Committee Statement:** The revision changes the terminology for consistency with 7.2.1.6.2.

**Response Message:** FR-6577-NFPA 101-2024



## First Revision No. 6653-NFPA 101-2024 [ New Section after 12.2.5.7.9 ]

**12.2.5.7.10** Steps in Aisle Accessways.

**12.2.5.7.10.1**

Steps in aisle accessways shall be marked as required for aisles in 12.2.5.8.10 .

**12.2.5.7.10.2**

Steps in aisle accessways shall be illuminated as required for aisles in Section 7.8 .

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Thu Jul 18 17:50:07 EDT 2024

### Committee Statement

**Committee Statement:** Steps in aisle accessways is a more recent development. These steps, whether for a transition from one level to another within the row or to separate the aisle accessway from the higher surface that chairs are mounted on for sightlines, are usually a single step with the known hazard, unexpected as explained in A.7.1.7.2. Similar to marking and because these are usually between rows of fixed seating which blocks illumination, these should be illuminated as well.

**Response Message:** FR-6653-NFPA 101-2024

Public Input No. 171-NFPA 101-2024 [New Section after 12.2.5.7]



## First Revision No. 6685-NFPA 101-2024 [ Section No. 12.3.4.3 [Excluding any Sub-Sections] ]

The required fire alarm system shall activate an audible and ~~visible~~ visual alarm in a constantly attended receiving station within the building when occupied for purposes of initiating emergency action.

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Mon Jul 22 13:12:10 EDT 2024

### Committee Statement

**Committee Statement:** The revision is intended for consistency with NFPA 72 as directed by the correlating committee.

**Response Message:** FR-6685-NFPA 101-2024



## First Revision No. 6686-NFPA 101-2024 [ Sections 12.3.4.3.4, 12.3.4.3.5 ]

### 12.3.4.3.4

Occupant notification shall be by means of ~~visible~~ visual signals in accordance with 9.6.3.6, initiated by the person in the constantly attended receiving station, unless otherwise permitted by 12.3.4.3.5.

### 12.3.4.3.5\*

~~Visible~~ Visual signals shall not be required in the assembly seating area, or the floor area used for the contest, performance, or entertainment, where the occupant load exceeds 1000 and an approved, alternative ~~visible~~ visual means of occupant notification is provided. (See 9.6.3.6.7.)

## Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Mon Jul 22 13:13:22 EDT 2024

## Committee Statement

**Committee Statement:** The revision is intended for consistency with NFPA 72 as directed by the correlating committee.

**Response Message:** FR-6686-NFPA 101-2024



## First Revision No. 6648-NFPA 101-2024 [ Section No. 12.3.5.1 ]

### 12.3.5.1\*

The following assembly occupancies shall be protected throughout by an approved, electrically supervised automatic sprinkler system in accordance with 9.7.1.1(1) and 9.7.2:

- (1) Dance halls
- (2) Discotheques
- (3) Nightclubs
- (4) Bars
- (5) Restaurants
- (6) Assembly occupancies with festival seating

#### A.12.3.5.1

The provisions of 12.3.5.1 were added after The Station nightclub fire on February 20, 2003. One-hundred people died and 230 people were injured as a result of the fire spreading faster than the egress system could allow people to exit. In accordance with 12.3.5.1, automatic sprinklers are required in certain types of new assembly occupancies where the occupant load is 50 or more. In accordance with 13.3.5.1, automatic sprinklers are required in certain types of existing assembly occupancies where the occupant load is greater than 100. These assembly occupancies, in particular, might be subject to dynamic occupant densities depending on the nature of the venue, entertainment provided, and time of day. Sprinklers provide enhanced life safety in situations where crowds might suddenly move as a group towards an exit during a fire emergency by providing patrons additional time to discover alternative exits.

## Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Thu Jul 18 17:06:16 EDT 2024

## Committee Statement

**Committee Statement:** The revision was developed by a task group on special assembly occupancies and provides explanatory information for the requirement for sprinklers in nightclub-type assembly occupancies.

**Response Message:** FR-6648-NFPA 101-2024



## First Revision No. 6687-NFPA 101-2024 [ Section No. 12.4.9.4.2.2 ]

### 12.4.9.4.2.2

In Class C special amusement buildings, actuation of any smoke detection system device shall activate an audible and ~~visible~~ visual alarm in a constantly attended receiving station within the building when occupied for purposes of initiating emergency action.

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Mon Jul 22 13:14:17 EDT 2024

### Committee Statement

**Committee Statement:** The revision is intended for consistency with NFPA 72 as directed by the correlating committee.

**Response Message:** FR-6687-NFPA 101-2024



## First Revision No. 6651-NFPA 101-2024 [ New Section after 13.1.7.4 ]

### 13.1.7.5 Fixed Seating.

The occupant load of fixed seating shall be the total of the number of fixed seats, wheelchair spaces, and companion seats.

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Thu Jul 18 17:25:30 EDT 2024

### Committee Statement

**Committee Statement:** The revision clarifies that the occupant load of fixed seating areas includes wheelchair spaces and seats for companions. The committee requests that the correlating committee modify Table 7.3.1.2 to reflect this revision and delete this paragraph.

**Response Message:** FR-6651-NFPA 101-2024



## First Revision No. 6578-NFPA 101-2024 [ Section No. 13.2.2.2.6 ]

### 13.2.2.2.6

Doors in the means of egress shall be permitted to be equipped with an approved ~~access control~~ sensor-release of electrical locking system complying with 7.2.1.6.2, and such doors shall not be locked from the egress side when the assembly occupancy is occupied. (See 7.2.1.1.3.)

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Tue Jul 16 11:50:12 EDT 2024

### Committee Statement

**Committee Statement:** The revision changes the terminology for consistency with 7.2.1.6.2.

**Response Message:** FR-6578-NFPA 101-2024



## First Revision No. 6654-NFPA 101-2024 [ New Section after 13.3.4.3 ]

### 13.3.4.4 Carbon Monoxide Detection.

#### 13.3.4.4.1

Existing assembly occupancies shall be provided with carbon monoxide warning equipment in accordance with Section 9.12 as specified in the following locations:

- (1) In rooms containing permanently installed fuel-burning appliances or fuel-burning fireplaces
- (2) Within occupiable spaces served by the first supply air register from permanently installed fuel-burning heating, ventilation, and air-conditioning (HVAC) systems
- (3)\* Within occupiable spaces adjacent to an attached garage

#### A.13.3.4.4.1(3) \_

The intent is to require CO detectors in occupiable spaces immediately adjacent, vertically or horizontally, to attached garages, regardless of the presence of openings between the garage and the adjacent occupiable spaces. Other occupiable spaces that are not adjacent to the attached garage do not require CO detectors.

#### 13.3.4.4.2

Carbon monoxide detectors as specified in 13.3.4.4.1 shall not be required in the following locations:

- (1) Garages
- (2) Occupiable spaces with attached garages that are open parking structures as defined in 3.3.297.8.2
- (3) Occupiable spaces with attached garages that are mechanically ventilated in accordance with the mechanical code

## Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Thu Jul 18 18:01:31 EDT 2024

## Committee Statement

**Committee Statement:** The revision was developed by a task group on carbon monoxide detection that discussed, at length, changes that would require a basic level of analysis and CO protection for existing occupancies without saddling smaller businesses with an undue burden.

**Response Message:** FR-6654-NFPA 101-2024

Public Input No. 223-NFPA 101-2024 [New Section after 13.3.4.3.4]

[Public Input No. 7-NFPA 101-2024 \[New Section after 13.3.4.3.7\]](#)

[Public Input No. 319-NFPA 101-2024 \[New Section after 13.3.4.3.7\]](#)



## First Revision No. 6649-NFPA 101-2024 [ Section No. 13.3.5.1 ]

### 13.3.5.1\*

Where the occupant load exceeds 100, the following assembly occupancies shall be protected throughout by an approved, electrically supervised automatic sprinkler system in accordance with 9.7.1.1(1) and 9.7.2:

- (1) Dance halls
- (2) Discotheques
- (3) Nightclubs
- (4) Assembly occupancies with festival seating

#### **A.13.3.5.1**

The provisions of 13.3.5.1 were added after The Station nightclub fire on February 20, 2003. One-hundred people died and 230 people were injured as a result of the fire spreading faster than the egress system could allow people to exit. In accordance with 12.3.5.1, automatic sprinklers are required in certain types of new assembly occupancies where the occupant load is 50 or more. In accordance with 13.3.5.1, automatic sprinklers are required in certain types of existing assembly occupancies where the occupant load is greater than 100. These assembly occupancies, in particular, might be subject to dynamic occupant densities depending on the nature of the venue, entertainment provided, and time of day. Sprinklers provide enhanced life safety in situations where crowds might suddenly move as a group towards an exit during a fire emergency by providing patrons additional time to discover alternative exits.

## Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Thu Jul 18 17:11:28 EDT 2024

## Committee Statement

**Committee Statement:** The revision was developed by a task group on special assembly occupancies and provides explanatory information for the requirement for sprinklers in nightclub-type assembly occupancies.

**Response Message:** FR-6649-NFPA 101-2024



## First Revision No. 6688-NFPA 101-2024 [ Section No. 13.4.9.4.2.2 ]

### 13.4.9.4.2.2

In Class C special amusement buildings, actuation of any smoke detection system device shall activate an audible and ~~visible~~ visual alarm in a constantly attended receiving station within the building when occupied for purposes of initiating emergency action.

### Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Mon Jul 22 13:15:11 EDT 2024

### Committee Statement

**Committee Statement:** The revision is intended for consistency with NFPA 72 as directed by the correlating committee.

**Response Message:** FR-6688-NFPA 101-2024



## First Revision No. 6588-NFPA 101-2024 [ Section No. A.3.3.257.1 ]

### A.3.3.260.1 Festival Seating.

Festival seating describes situations in assembly occupancies where live entertainment events are held that are expected to result in overcrowding and high audience density that can compromise public safety. It is not the intent to apply the term *festival seating* to exhibitions; sports events; conventions; and bona fide political, religious, and educational events. Assembly occupancies with 15 ft<sup>2</sup> (1.4 m<sup>2</sup>) or more per person should not be considered festival seating. Because the absence of chairs or reserved standing areas can result in crowd density greater than 7 ft<sup>2</sup> (0.65 m<sup>2</sup>) per person, it is important for the event organizer to plan for the safety issues raised by both moving and stationary crowds in assembly occupancies that use festival seating, regardless of the type of event. For festival seating events in dance halls, nightclubs, and discotheques where the occupant load exceeds 250 people, and in all other assembly occupancies where the occupant load exceeds 1000, event organizers should perform a life safety evaluation to identify relevant crowd management issues. The life safety evaluation should include the means of preserving egress routes and plans to avoid localized overcapacity, which can occur both near attractions and in pockets throughout a standing general admission area. The event organizer can document risk mitigation measures related to festival seating in their facility management and operational plans.

Assembly occupancies without fixed seating where there is 15 ft<sup>2</sup> (1.4 m<sup>2</sup>) or more per person are unlikely to face either the same egress or standing density challenges, so they should not be considered festival seating. Examples of such excluded areas include a lawn where guests bring folding chairs and picnics to watch a performance, a school gymnasium, or cafeterias.

## Supplemental Information

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
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## Submitter Information Verification

**Committee:** SAF-AXM

**Submittal Date:** Tue Jul 16 16:16:36 EDT 2024

## Committee Statement

**Committee Statement:** The revision was developed by a task group on festival seating, the report for which follows:

1. The first sentence in the current Annex is substantively wrong. Many unreserved standing room events should NOT be expected to result in “overcrowding and high audience density that can compromise public safety.” For example, a member of this task group recently attended a festival seating concert by a Taylor Swift tribute artist in a New York suburb. There was no issue of overcrowding or high audience density among either the pre-adolescent girls or their mothers, who comprised the vast majority of the crowd. It would not strain the memory of most event professionals to come up with lots of similar examples.

2. The current Annex also is pejorative in a way that casts a negative light on an economically essential part of the live event industry. Streaming has made “record” sales financially irrelevant for all but the biggest artists, which explains the proliferation of big festivals, and the broadcast revenue from live sporting events with audiences drives that industry. To say all these events are likely to compromise public safety is to give an unjustified running start to every personal injury lawyer whose client got hurt at a festival seating event.

3. The Code is a victim of its own success. Because there is a relative dearth of authoritative safety guidance regarding public assembly facilities in the United States, lawyers grasp at whatever they can find. Whether or not the drafters of Code provisions intend for their work to be used in litigation, the certainty is that it will be. We must be mindful of all our foreseeable audiences, not just AHJs and public safety users.

4. In the second sentence of the current Annex, the carve-outs for “exhibitions, sports events, conventions, and bona fide political, religious, and educational events” appear to be the product of long-ago lobbying efforts. Sports and religious events are notoriously dangerous to crowds. The Hillsborough tragedy immediately comes to mind as a sports venue where festival seating became deadly, and world football has many similar crowd disasters. Religious events, similarly, are obviously fraught with crowd risks, as we are reminded by crush injuries among Hajj pilgrims every year and the Lag B’Omer disaster discussed in the July 13, 2021 issue of NFPA Journal. As for the other carve-outs, what is an “exhibition?” Do conventions, political rallies, or educational events reach the occupant load levels to qualify as festival seating? This sentence serves no legitimate purpose we can see.

5. We’re okay with the third sentence, and we have provided a couple of simple examples in our version.

Explanation of the revision:

6. The new Annex begins by highlighting the reason festival seating is a proper subject for life safety consideration: it is “unreserved standing room.”

7. The second sentence begins by identifying the resulting problem – the likelihood of crowd density greater than 7 ft<sup>2</sup> (0.65 m<sup>2</sup>) per person.

8. Importantly, the sentence then notes that excessive crowd density can imperil both moving crowds (this provision was inspired by the Who ingress disaster in 1979, and ingress and egress crushes at events without reserved seats have been a regular problem since then) and stationary crowds (less common, but no less deadly, such as the Roskilde festival or more recently, Astroworld). We intend to alert event organizers that both crowd situations have hazards, albeit different from each other.

9. The second sentence concludes by excluding no type of event. Anywhere the factors of unreserved spaces and standing room co-exist, there are crowd crush risks that must be assessed and mitigated. Safety doesn’t play favorites.

10. The third sentence is intended to direct users to the valuable tool of a Life Safety Evaluation. Unfortunately, the exceptions in 12.2.5.6.1 compel us to restate those exceptions in our Annex. Thus, the clunky structure of the first two clauses.

11. After referring users to the Life Safety Evaluation, we point them to the safety goals specific to festival seating: “preserving egress routes and plans to avoid localized overcapacity.” We are mindful that 7 ft<sup>2</sup> per person is expressly designated as an egress figure in the Code, but we also know that figure is weaponized in litigation to suggest that anything denser in a standing area is unreasonably dangerous. This is why we emphasize the potential hazards of both moving and stationary crowds.

12. The last part of the third sentence underscores that unsafe crowd density is not limited to the area immediately behind the stage barricade. Again, Astroworld reminds us

that even the middle of a stage right rear barricade area can have dangerous pockets of crowd density. Because we don't know what causes them, it's essential that organizers be vigilant and include means of monitoring the entire crowd, not just the most obviously dense areas.

13. The last sentence in the first paragraph is intended to highlight the granular itemization of safety issues in Facility Management and Operational Plans, which we love. This puts meat on the bones of a Life Safety Evaluation, whose description is less detailed.

14. We intentionally do not cite provisions by number because all aspects of festival seating apply equally to new and existing assembly occupancies.

15. The last paragraph of the new Annex simply expands upon the last sentence in the current version. We feel that a specific occupant load figure coupled with common examples will help distinguish circumstances that require a detailed festival seating safety evaluation from those which, because they do not have the same risk profile and do not fall within the definition, do not require the same level of scrutiny.

**Response** FR-6588-NFPA 101-2024

**Message:**

[Public Input No. 199-NFPA 101-2024 \[Section No. A.3.3.257.1\]](#)



## First Revision No. 6689-NFPA 101-2024 [ Section No. A.12.3.4.3.5 ]

### A.12.3.4.3.5

Examples of devices that might be used to provide alternative ~~visible~~ visual means include scoreboards, message boards, and other electronic devices.

### Submitter Information Verification

**Committee:** SAF-AXM

**Submission Date:** Mon Jul 22 13:16:21 EDT 2024

### Committee Statement

**Committee Statement:** The revision is intended for consistency with NFPA 72 as directed by the correlating committee.

**Response Message:** FR-6689-NFPA 101-2024