



# **NATIONAL FIRE PROTECTION ASSOCIATION**

The leading information and knowledge resource on fire, electrical and related hazards

## **AGENDA**

**NFPA Building Code/Safety to Life Technical Committee on Educational and Day-Care  
Occupancies (BLD/SAF-END)  
NFPA 101/5000 Second Draft Meeting (A2026)**

July 23, 2025  
8 a.m. – 5 p.m. (ET)

Baltimore Marriott Inner Harbor at Camden Yards  
Baltimore, Maryland  
To join the meeting, please contact [jyee@nfpa.org](mailto:jyee@nfpa.org)

1. **Call to order.** Matthew Mertens.
2. **Introductions.** See committee roster attached.
3. **Chair report.** Matthew Mertens.
4. **Staff liaison report.** Camille Levy.
5. **Previous meeting minutes.** July 2024, Kansas City. See attached.
6. **Review Correlating Committee on Building Code previous meeting minutes.** See attached.
  - a. **Minute item 10.b.vii.** BLD-END scope.
  - b. **Minute item 10.b.xiii.1.** Turnstile requirements.
7. **Review Correlating Committee on Safety to Life previous meeting minutes.** See attached.
  - a. **Minute item 9.b.v.** SAF-END scope.
  - b. **Minute item 9.b.xi.** Turnstile requirements.
  - c. **Minute item 9.b.xiv.1.** Low frequency alarms.
  - d. **Minute item 9.b.xiv.2.** Gas detection warning systems.
8. **NFPA 101/5000 Second Draft.**
  - a. **Task group reports.**
    - i. **Building security.** Maria Marks.
    - ii. **Emergency Responder Communications Enhancement Systems.** Maria Marks.
    - iii. **Graphic map.** Larry Rietz
  - b. **NFPA 101 Second Draft.**
    - i. **Referenced publications.**
    - ii. **Extracts.** No extract updates needed.

- iii. **Public Comments.** See attached.
- iv. **Committee Inputs.** See attached.
- v. **Informational Public Comment.** See 101-PC-101 attached.
- vi. **Staff items for consideration.**
- c. **NFPA 5000 Second Draft.**
  - i. **Referenced publications.**
  - ii. **Extracts.** No extract updates needed.
  - iii. **Committee Inputs.** See attached.
  - iv. **Informational Public Comment.** See 5000-PC-56 attached.
  - v. **Staff Items for consideration.**
- 9. **Other business.**
- 10. **Future meetings.**
- 11. **Adjournment.**

# Address List No Phone

06/09/2025  
Camille Levy  
**BLD-END**

## Educational and Day-Care Occupancies

### Building Code

<b>Matthew J. Mertens</b>	<b>E 3/1/2011</b>	<b>Camille Levy</b>	<b>3/31/2021</b>
<b>Chair</b>	<b>BLD-END</b>	<b>Secretary (Staff-Nonvoting)</b>	<b>BLD-END</b>
North Shore Fire Department 665 East Brown Deer Road Bayside, WI 53217 <b>International Fire Marshals Association (IFMA)</b>		National Fire Protection Association (NFPA) 1 Batterymarch Park Quincy, MA 02169-7471	
<b>Zainul Abedeen</b>	<b>SE 04/02/2020</b>	<b>Clay P. Aler</b>	<b>SE 10/28/2014</b>
<b>Principal</b>	<b>BLD-END</b>	<b>Principal</b>	<b>BLD-END</b>
WSP Middle East 2703 U Bora Tower Business Bay PO Box 7497 Dubai, DUBAI 7497 United Arab Emirates		Koffel Associates, Inc. 8815 Centre Park Drive Suite 200 Columbia, MD 21045-2107	
<b>Mohammed Alsulaiti</b>	<b>E 04/03/2019</b>	<b>Dorn J Beddow</b>	<b>U 08/08/2019</b>
<b>Principal</b>	<b>BLD-END</b>	<b>Principal</b>	<b>BLD-END</b>
State of Qatar Ministry of Interior-Qatar Civil Defense Alhilal, Sufyan Bin Wahid St Doha, NA Qatar		Lee County School District (LCSD) 16075 Daisy Drive Punta Gorda, FL 33955	
<b>Scott J. Blaser</b>	<b>U 08/17/2017</b>	<b>Samuel S. Dannaway</b>	<b>SE 7/24/1997</b>
<b>Principal</b>	<b>BLD-END</b>	<b>Principal</b>	<b>BLD-END</b>
Florida School Boards Association 800 N. Calhoun Street Tallahassee, FL 32303		Coffman Engineers 745 Fort Street, Suite 400 Honolulu, HI 96813	
<b>Richard M. DiMisa</b>	<b>SE 3/4/2009</b>	<b>Jason D. Ellis</b>	<b>U 12/08/2015</b>
<b>Principal</b>	<b>BLD-END</b>	<b>Principal</b>	<b>BLD-END</b>
Code Consultants, Inc. 2043 Woodland Parkway Suite 300 St. Louis, MO 63146-4235 <b>Alternate: Kathleen Lauren Miller</b>		University of Kentucky 252 East Maxwell Court Lexington, KY 40508-2613	
<b>Keith S. Frangiamore</b>	<b>SE 10/4/2007</b>	<b>James D. Gammon</b>	<b>M 11/29/2023</b>
<b>Principal</b>	<b>BLD-END</b>	<b>Principal</b>	<b>BLD-END</b>
Fire Safety Consultants, Inc. 2420 Alft Lane, Suite 100 Elgin, IL 60124		Door and Hardware Institute (DHI) 123 Summerfield Court Advance, NC 20006	
<b>Jeffrey L. Haidacher</b>	<b>U 03/03/2014</b>	<b>Raymond N. Hansen</b>	<b>U 12/08/2015</b>
<b>Principal</b>	<b>BLD-END</b>	<b>Principal</b>	<b>BLD-END</b>
Fairfax County Public Schools 8115 Gatehouse Road Suite 3500 Falls Church, VA 22042		US Department of the Air Force AFCEC/COSM 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319 <b>Alternate: Andrew S. Carmean</b>	

# Address List No Phone

06/09/2025  
Camille Levy  
**BLD-END**

## Educational and Day-Care Occupancies

### Building Code

<b>Tyler James Hebert</b>	<b>E</b> 08/29/2024	<b>Howard Hopper</b>	<b>RT</b> 08/17/2015
<b>Principal</b> Louisiana Office of State Fire Marshal 139 Shamrock Drive Gray, LA 70359	<b>BLD-END</b>	<b>Principal</b> UL LLC 47173 Benicia Street Fremont, CA 94538-7366	<b>BLD-END</b>
<b>Terrence J. Julka</b>	<b>M</b> 08/17/2017	<b>Maria B. Marks</b>	<b>M</b> 03/05/2012
<b>Principal</b> J. F. Ahern Company 855 Morris Street Fond Du Lac, WI 54935 <b>National Fire Sprinkler Association</b> <b>Alternate: Karl Wiegand</b>	<b>BLD-END</b>	<b>Principal</b> Siemens 4001 Spruell Drive Kensington, MD 20895-1346 <b>National Electrical Manufacturers Association</b> <b>Alternate: Richard Jay Roberts</b>	<b>BLD-END</b>
<b>Guillermo Antonio Oviedo Vela</b>	<b>U</b> 08/24/2021	<b>Mitchell Ramseur</b>	<b>SE</b> 08/24/2021
<b>Principal</b> The Church of Jesus Christ of Latter-Day Saints 150 E. North Temple Salt Lake City, UT 84150	<b>BLD-END</b>	<b>Principal</b> M. Ramseur & Associates, PLLC. 925B Peachtree Street NE Suite 2041 Atlanta, GA 30309	<b>BLD-END</b>
<b>Kurt A. Roeper</b>	<b>M</b> 7/26/2007	<b>Michael L. Savage, Sr.</b>	<b>E</b> 8/11/2014
<b>Principal</b> ASSA ABLOY 110 Sargent Drive New Haven, CT 06511 <b>Steel Door Institute</b> <b>Alternate: Marilyn Latham</b>	<b>BLD-END</b>	<b>Principal</b> Marion County Building Safety 2710 E. Silver Springs Blvd. Ocala, FL 34470	<b>BLD-END</b>
<b>Catherine L. Stashak</b>	<b>E</b> 1/17/1991	<b>Aleksy L. Szachnowicz</b>	<b>U</b> 7/24/1997
<b>Principal</b> Office of the Illinois State Fire Marshal 555 W. Monroe Street Suite 1300-N Chicago, IL 60661 <b>Office of the Illinois State Fire Marshal</b>	<b>BLD-END</b>	<b>Principal</b> Anne Arundel County Public Schools 2644 Riva Road Annapolis, MD 21401	<b>BLD-END</b>
<b>Larry D. Rietz</b>	<b>M</b> 12/06/2017	<b>Andrew S. Carmean</b>	<b>U</b> 08/11/2020
<b>Voting Alternate</b> Jensen Hughes 10170 Church Ranch Way Suite 200 Westminster, CO 80021 <b>Automatic Fire Alarm Association</b>	<b>BLD-END</b>	<b>Alternate</b> US Department of the Air Force 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32439 <b>Principal: Raymond N. Hansen</b>	<b>BLD-END</b>

# Address List No Phone

06/09/2025  
Camille Levy  
**BLD-END**

## Educational and Day-Care Occupancies

### Building Code

<b>Marilyn Latham</b>	<b>M 08/23/2023</b>	<b>Kathleen Lauren Miller</b>	<b>SE 08/23/2023</b>
<b>Alternate</b>	<b>BLD-END</b>	<b>Alternate</b>	<b>BLD-END</b>
Steelcraft Manufacturing		Code Consultants, Inc. (CCI)	
155 Republic Drive		2043 Woodland Parkway	
McKenzie, TN 38201		#300	
<b>Steel Door Institute</b>		St. Louis, MO 63146	
<b>Principal: Kurt A. Roeper</b>		<b>Principal: Richard M. DiMisa</b>	
<hr/>			
<b>Richard Jay Roberts</b>	<b>M 3/1/2011</b>	<b>Karl Wiegand</b>	<b>M 08/17/2017</b>
<b>Alternate</b>	<b>BLD-END</b>	<b>Alternate</b>	<b>BLD-END</b>
Honeywell Fire Safety		Victaulic Company of America	
624 Hammer Lane		2371 Copper Creek Drive	
North Aurora, IL 60542-9155		Bay City, MI 48706-4172	
<b>National Electrical Manufacturers Association</b>		<b>National Fire Sprinkler Association</b>	
<b>Principal: Maria B. Marks</b>		<b>Principal: Terrence J. Julka</b>	
<hr/>			
<b>Camille Levy</b>	<b>3/31/2021</b>		
<b>Staff Liaison</b>	<b>BLD-END</b>		
National Fire Protection Association (NFPA)			
1 Batterymarch Park			
Quincy, MA 02169-7471			



# NATIONAL FIRE PROTECTION ASSOCIATION

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## MINUTES

### NFPA Technical Committee on Educational and Day-Care Occupancies (BLD/SAF-END) NFPA 101 & NFPA 5000 First Draft Meeting (A2026)

July 17, 2024  
8:00 a.m. – 5:56 p.m. (CT)

Embassy Suites by Hilton Kansas City Plaza  
Kansas City, Missouri

1. **Call to order.** Matthew Mertens, chair, called the meeting to order at 8:00 a.m. on July 17, 2024.
2. **Introductions.** Attendees introduced themselves and identified their affiliation.
3. **Chair report.** Matthew Mertens welcomed attendees and provided an overview of the meeting.
4. **Staff liaison report.** Camille Levy provided an overview of the standards development process, the revision cycle schedule, and the reference and extract update process.
  - a. No members declared that they had been retained to represent the interest of an entity that would be classified in an interest category different from their own with respect to a specific issue or issues that were addressed by the committee.
5. **Previous meeting minutes.** The minutes from August 2022 Web/Teleconference were approved without revision.
6. **Correlating committee direction for 2027 editions.**
  - a. **Separation of vertical buildings.** The technical committee reviewed the requirements related to separation of vertical buildings and no action was taken.
  - b. **Fire alarm notification signal terminology (visual/visible).** The technical committee reviewed its chapters in NFPA 101 and NFPA 5000 for fire alarm notification signal terminology and found no instances of this. No action needed.
7. **Task group report.** The following task group provided their report and recommendations.
  - a. **Building security.** Maria Marks. The task group met and submitted Public Inputs. First Revisions and Committee Inputs were made (see first draft report). The task group was reconstituted to continue work. TG Chair: Maria Marks. Members: Dorn Beddow, Samuel Dannaway, Matthew Mertens, Guillermo Oviedo Vela, Catherine Stashak, and Aleksy Szachnowicz.
8. **NFPA 101 First Draft.**

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These minutes are considered preliminary until approved at the next committee meeting.

- a. **Review of Public Inputs.** The Technical Committee reviewed the Public Inputs and developed First Revisions and Committee Inputs as necessary. These will be available in the First Draft Report at [www.nfpa.org/101](http://www.nfpa.org/101).
- b. **Informational Public Input.** The Technical Committee reviewed the informational Public Inputs, and no action was taken.
- c. **New task groups.** The following task groups were appointed to work subsequent to the meeting:
  - i. **Emergency Responder Communications Enhancement Systems (ERCES).** TG Chair: Maria Marks. Members: Samuel Dannaway, James Gammon, Matthew Mertens, Guillermo Oviedo Vela, Richard Roberts, Michael Savage, and Catherine Stashak. Review the language in NFPA 101 Committee Inputs No. 6595 and 6597 and NFPA 5000 Committee Input No. 8120 and submit public comments.
  - ii. **Graphic map.** TG Chair: Larry Rietz. Members: Samuel Dannaway, Matthew Mertens, Guillermo Oviedo Vela, Catherine Stashak, and Aleksy Szachnowicz. Continue developing the new graphic map requirements in NFPA 101 14.7.1 and 15.7.1. See NFPA 101 First Revision No. 6716 and 6723. Submit public comments or provide recommendations to the committee prior to the second draft meeting.

## 9. NFPA 5000 First Draft.

- a. **Review of Public Inputs.** The Technical Committee reviewed the Public Inputs and developed First Revisions and Committee Inputs as necessary. These will be available in the First Draft Report at [www.nfpa.org/5000](http://www.nfpa.org/5000).

## 10. Other Business.

- a. **Technical committee scopes.** A motion passed to request SAF-AAC and BLD-AAC to review the following proposed revisions to the SAF-END and BLD-END scopes. The scopes are based on the recently updated scopes proposed by the Correlating Committees.
  - i. SAF-END:
 

*This Committee shall have primary responsibility for documents on protection of human life from fire and other circumstances capable of producing ~~similar consequences~~ a threat to human life, and on the nonemergency and emergency movement of people in educational occupancies and day-care occupancies.*
  - ii. BLD-END:
 

*This Committee shall have primary responsibility for documents on protection of human life and property from fire and other circumstances capable of producing ~~similar consequences~~ a threat to human life and property, and on the nonemergency and emergency movement of people in educational occupancies and day-care occupancies.*
- b. **Modular rooms and sleep pods.** Committee Inputs were created in NFPA 101 and NFPA 5000 related to modular rooms and sleep pods. See NFPA 101 Committee Inputs No. 6633, 6710, 6711, and 6712, and NFPA 5000 Committee Inputs No. 8185 and 8186.

**11. Future meetings.** The next committee meeting will be Summer 2025. A meeting notification will be posted at [www.nfpa.org/101next](http://www.nfpa.org/101next) and [www.nfpa.org/5000next](http://www.nfpa.org/5000next) when the meeting is scheduled.

**12. Adjournment.** The meeting was adjourned at 5:56 p.m. on July 17, 2024.

### Attendees

#### **Committee Members:**

✓	<b>Mertens, Matthew</b>	Chair	International Fire Marshals Association
✓	<b>Aler, Clay*</b>	Principal	Koffel Associates, Inc.
	<b>Alsulaiti, Mohammed</b>	Principal	State of Qatar Ministry of Interior-Qatar
	<b>Beddow, Dorn</b>	Principal	Lee County School District (LCSD)
	<b>Blaser, Scott</b>	Principal	Florida School Boards Association
✓	<b>Dannaway, Samuel</b>	Principal	Coffman Engineers
✓	<b>DiMisa, Richard*</b>	Principal	Code Consultants, Inc.
✓	<b>Ellis, Jason*</b>	Principal	University of Kentucky
	<b>Frangiamore, Keith</b>	Principal	Fire Safety Consultants, Inc.
✓	<b>Frye, Laura</b>	Principal	Door Safety LLC
✓	<b>Gammon, James</b>	Principal	Door and Hardware Institute
✓	<b>Haidacher, Jeffrey*</b>	Principal	Fairfax County Public Schools
	<b>Hansen, Raymond</b>	Principal	US Department of the Air Force
	<b>Hopper, Howard</b>	Principal	UL Solutions
✓	<b>Julka, Terrence*</b>	Principal	National Fire Sprinkler Association
✓	<b>Marks, Maria*</b>	Principal	National Electrical Manufacturers
✓	<b>Oviedo Vela, Guillermo</b>	Principal	The Church of Jesus Christ of Latter-Day
	<b>Ramseur, Mitchell</b>	Principal	M. Ramseur & Associates, PLLC.
	<b>Roeper, Kurt</b>	Principal	Steel Door Institute
✓	<b>Savage, Michael*</b>	Principal	Marion County Building Safety
✓	<b>Stashak, Catherine</b>	Principal	Office of the Illinois State Fire Marshal
✓	<b>Szachnowicz, Aleksy*</b>	Principal	Anne Arundel County Public Schools
✓	<b>Abedeem, Zainul*</b>	Voting Alternate	WSP Middle East
✓	<b>Rietz, Larry</b>	Voting Alternate	Automatic Fire Alarm Association, Inc.
	<b>Carmean, Andrew</b>	Alternate	US Department of the Air Force
	<b>Ernest, Brandon</b>	Alternate	University of Kentucky



✓	<b>Latham, Marilyn*</b>	Alternate	Steel Door Institute
	<b>Miller, Kathleen</b>	Alternate	Code Consultants, Inc. (CCI)
✓	<b>Roberts, Richard*</b>	Alternate	National Electrical Manufacturers
✓	<b>Wiegand, Karl*</b>	Alternate	National Fire Sprinkler Association
✓	<b>Levy, Camille</b>	Staff Liaison	National Fire Protection Association

**Guests:**

John Woestman	Kellen Company, rep. BHMA
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\*Participated by teleconference

Total number in attendance: 21



# NATIONAL FIRE PROTECTION ASSOCIATION

The leading information and knowledge resource on fire, electrical and related hazards

## MINUTES

### NFPA Correlating Committee on Building Code (BLD-AAC)

#### NFPA 5000 First Draft Meeting (A2026)

January 24, 2025  
9 a.m. – 2 p.m. (ET)

NFPA Headquarters, Quincy, MA and  
Microsoft Teams Remote Meeting

1. **Call to order.** P. Willse, chair, called the meeting to order at 9 a.m. on January 24, 2025.
2. **Introductions.** Attendees introduced themselves and identified their affiliation. K. Carr, NFPA staff, took attendance.
3. **Chair report.** P. Willse welcomed attendees and provided an overview of the meeting.
4. **Staff liaison report.**
  - a. NFPA staff provided an overview of the standards development process, the available actions by the correlating committee, and the A2026 revision cycle schedule.
  - b. No members declared that they had been retained to represent the interest of an entity that would be classified in an interest category different from their own with respect to a specific issue or issues that were addressed by the committee.
5. **Previous meeting minutes.** The minutes from February 13, 2024, Web/Teleconference were approved without revision.
6. **Liaison reports.**
  - i. **Sprinkler project.** W. Koffel. NFPA 13/NFPA 13R/NFPA 13D are open for Public Input. First Draft meetings will occur in August 2025. No apparent conflicts or concerns exist between revised sprinkler standards and NFPA 101/NFPA 5000.
  - ii. **Fire alarm project.** S. Clary. NFPA 72, 2025 edition, was published in late 2024. First Draft meetings are scheduled for July 2025. The topic of restricted audible mode operation (RAMO) notification was discussed.
7. **Correlating Committee task group reports.** The following task groups provided their reports and recommendations.
  - i. **Sprinkler system supervision.** Chair: J. Hugo. The task group provided a report, no revisions were made. The task group has been discharged with thanks.

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These minutes are considered preliminary until approved at the next committee meeting.

- ii. **Occupant load terminology.** Chair: M. Crowley. The task group provided a report, no revisions were made. The task group was retained on the agenda. See attached.
- iii. **Modular rooms/Sleep pods.** Chair: H. Hopper. No report was provided. The task group was retained on the agenda.
- iv. **Short-term rental housing.** Staff reported the subject was referred to a task group of the Technical Committee on Residential occupancies as the issues appeared to be technical rather correlative. No correlating committee task group was appointed.
- v. **Exterior walls.** Staff provided a report. BLC and SCM addressed this topic during the First Draft meetings via a joint task group of both committees. The correlating committee task group was retained on the agenda. BLC/SCM chairs to provide a report at the next meeting.
- vi. **New task groups.** The following task groups were appointed to work subsequent to the meeting:
  - i. **NFPA 915.** TG Chair: J. Hugo. Members: M. Marks, NFPA 5000 Technical Committee chairs. Review First Revisions pertaining to NFPA 915 and determine the scope and application of this document within NFPA 5000.
  - ii. **Technical Committee Scopes.** See 10-b-vii.

## 8. Direction to all technical committees.

- i. **Separation of vertical buildings.** Staff provided a report. No action taken. BLC to review comment received via First Draft minutes at the Second Draft meeting.
- ii. **Fire alarm notification signal terminology.** Staff provided a report. BLD technical committees reviewed use of the terms *visual* and *visible* as they relate to fire alarm signals and revised, as needed, to align with NFPA 72, *National Fire Alarm and Signaling Code*. See the NFPA 5000 First Draft report for revisions.
- iii. **Non-NFPA extracts within NFPA 5000.** Staff provided a report. Applicable BLD technical committees reviewed extracts from non-NFPA documents as found within NFPA 5000. See the NFPA 5000 First Draft report for revisions.

## 9. Items to multiple technical committees.

- i. **Reference to NFPA 915.** Task group formed. See 6-f-i.
- ii. **Cybersecurity.** S. Clary, BSY member/BSY task group chair, provided a report. The Correlating Committee created FCR-9 to delete FR-8093, which provided a reference to a new Chapter 9/PI-125. The Correlating Committee requested that BSY review the topic of cybersecurity, consider providing annex material, and provide a report at the Correlating Committee Second Draft meeting.
- iii. **Lightning protection.** Report provided. No action taken.

## 10. NFPA 5000 First Draft.

- a. No First Correlating Revisions (FCRs) or Correlating Notes (CNs) were developed based on the Correlating Committee's review of the NFPA 5000-A2026 TC Responses to Public Inputs, TC Committee Inputs, TC First Revisions, and TC Ballot Final Reports.
- b. Technical committee items.
  - i. TC on Assembly Occupancies (BLD-AXM):
    - 1. FCRs were developed in response to the request by the TC on Assembly Occupancies to modify Table 11.3.1.2 for consistency with the actions on FR-8140. See the First Draft Report for revisions.
    - 2. The correlating committee reviewed the request by the TC on Assembly Occupancies to revise 11.8.1.1 for coordination with 16.2.5.7.10.2 in FR-8143. BLD-MEA is encouraged to consider this topic at their Second Draft meeting to coordinate with NFPA 101. The occupancy chapters can modify core chapter requirements, so no conflict exists. (Note: this request inadvertently appeared as item xii.2 under BLD-MEA in the meeting agenda.)
  - ii. TC on Board and Care Facilities (BLD-BCF): Jo. Rickard, chair of the TC on Board and Care Facilities, reported that there were no items for correlating committee review from that technical committee.
  - iii. TC on Building Construction (BLD-BLC): M. Chrisman, chair of the TC on Building Construction, advised the Correlating Committee of a task group reviewing requirements pertaining to Annex D. No action.
  - iv. TC on Building Systems (BLD-BSY): The Correlating Committee reviewed CI-8070. No action was taken. Ja. Rickard, chair of the TC on Building Systems, will provide a report on Chapter 12 to the Correlating Committee at Second Draft.
  - v. TC on Building Service and Fire Protection Equipment (BLD-BSF): The correlating committee reviewed the request by the TC on Building Service and Fire Protection Equipment for the appointment of a task group to review the instances of "where permitted/required in Chapters 11 through 43" and "where permitted/required in other section of this code" for consistency. Following discussion, the chair requested staff provide a preliminary review at the correlating committee Second Draft meeting.
  - vi. TC on Detention and Correctional Occupancies (SAF-DET): J. Serafim, chair of the TC on Detention and Correctional Occupancies, reported that there were no items for correlating committee review from that technical committee.
  - vii. TC on Educational and Day-Care Occupancies (SAF-END): The correlating committee reviewed the committee scope revision proposed by the TC on Educational and Day Care Occupancies. Staff noted that at the previous Second Draft meeting, proposed scope revisions for all of the TCs were submitted for consideration by the Standards Council, however, additional inconsistencies were discovered. It was recommended that all of the NFPA 5000 TC scopes be reviewed holistically in conjunction with the

NFPA 101 TC scopes. A joint task group, with SAF-AAC, was appointed to review the recommended scope revisions from the previous revision cycle with consideration of the newly proposed revisions by the TC on Educational and Day Care Occupancies and provide a report at the correlating committee Second Draft meeting. Task group members: M. Marks (TG chair, BLD-AAC and SAF-AAC), Stan Harbuck (SAF-AAC), all SAF TC chairs, all BLD TC chairs, and David Hood, guest.

- viii. TC on Fire Protection Features (BLD-FIR): N. Wittasek, chair of the TC on Fire Protection Features, reported that there were no items for correlating committee review from that technical committee.
- ix. TC on Fundamentals of Safety to Life (BLD-FUN): C. Jelenewicz, chair of the TC on Fundamentals of Safety to Life, reported that there were no items for correlating committee review from that technical committee.
- x. TC on Health Care Occupancies (SAF-HEA): FCRs and CNs were developed in response to the requests by the TC on Health Care Occupancies (see the First Draft Report for actions):
  - 1. Revise 6.1.6.1 and A.6.1.6.1 for consistency with revisions to the definition of *ambulatory health care occupancy* and its related annex text in 3.3.454.1 and A.3.3.454.1.
  - 2. Revise 11.2.3.12 as shown in PI-34 for consistency with the action on 19.2.2.4.2 and 19.2.2.4.3 in FR-8171. Additionally, MEA should consider comparing NFPA 5000, FCR-4, 11.2.3.12, and NFPA 101, FCR-5, for 7.2.3.12, and determine if text style correlation should occur.
  - 3. Revise 33.3.4.3.1 for consistency with the new 19.4.4 in FR-8175. Additionally, for FUN, compare NFPA 5000, FCR-6, 33.3.4.3.1, and NFPA 101, FCR-6, for 11.8.5.3.1, and review two items: 1.) Determine if Level 2 in NFPA 5000 or Level 1 in NFPA 101 should be changed to correlate, and 2.) Determine if text style correlation should occur.
- xi. TC on Industrial, Storage, and Miscellaneous Occupancies (BLD-IND): J. Sisco, staff liaison to the Technical Committee on Industrial, Storage, and Miscellaneous Occupancies, reported that there were no items for correlating committee review from that technical committee.
- xii. TC on Interior Finish (BLD-INT): The correlating committee reviewed the request by the TC on Interior Finish and Contents (BLD-INT) for guidance on its scope as it relates to modular room and sleep pod requirements. Following discussion, it was determined that modular room and sleep pod requirements relating to fire performance of interior finish should be maintained by BLD-INT. General requirements should be maintained by the TC on Fundamentals of Safety to Life (BLD-FUN). Fire alarm notification requirements should be maintained by the TC on Building Service and Fire Protection Equipment (BLD-BSF). Any occupancy-specific requirements can be maintained by the occupancy technical committees, as needed. Several FCRs were

developed to relocate requirements not within the scope of BLD-INT to other chapters as appropriate. See the NFPA 5000 First Draft Report for actions.

xiii. TC on Means of Egress (BLD-MEA):

1. The correlating committee reviewed the request by the TC on Means of Egress to direct the occupancy technical committees to review the turnstile requirements in 11.2.1.11 to determine if they should be referenced in their chapters. The occupancy technical committees are so directed.
2. See 10-b-i-2.

xiv. TC on Mercantile and Business Occupancies (BLD-MER): J. Sisco, staff liaison to the TC on Mercantile and Business Occupancies, reported that there were no items for correlating committee review from that technical committee.

xv. TC on Residential Occupancies (BLD-RES): B. Cronin, acting chair of the TC on Residential Occupancies, reported that there were no items for correlating committee review from that technical committee.

xvi. TC on Structures, Construction, and Materials (BLD-SCM): M. Savage, chair of the TC on Structures, Construction, and Materials, reported that there were no items for correlating committee review from that technical committee.

xvii. Staff items: The correlating committee reviewed items drafted by staff. See the NFPA 5000 First Draft Report for related CNs and FCRs.

**11. Other Business.** J. Pauls, member, inquired about the location and scheduling for the Second Draft meeting in 2025. Additionally, a question was raised regarding the availability of the First Draft report. NFPA staff provided details and noted that any further questions should be directed to NFPA staff in advance of the meeting.

**12. Future meetings.** The next committee meeting will be November/December 2025. A meeting notification will be posted at [www.nfpa.org/5000next](http://www.nfpa.org/5000next) when the meeting is scheduled.

**13. Adjournment.** The meeting was adjourned at 1:30pm on January 24, 2025.

**Attendees**

**Committee Members:**

X	Willse, Peter	Chair	Portland Fire Marshal's Office
X	Bellamy, Tracey*	Principal	American Fire Sprinkler Association
X	Frable, David*	Principal	US General Services Administration
X	Hansen, Raymond*	Principal	US Department of the Air Force
	Hopper, Howard	Principal	UL Solutions
X	Hugo, Jeffrey*	Principal	National Fire Sprinkler Association

	<b>O'Connor, Daniel</b>	Principal	American Hotel & Lodging Association
<b>X</b>	<b>Roberts, Richard*</b>	Principal	National Electrical Manufacturers
<b>X</b>	<b>Savage, Michael*</b>	Principal	Marion County Building Safety
<b>X</b>	<b>Shah, Faimeen*</b>	Principal	Vortex Fire Engineering Consultancy
<b>X</b>	<b>Tubbs, Jeffrey</b>	Principal	Arup
<b>X</b>	<b>Tyree, David</b>	Principal	American Wood Council
	<b>Vinci, Leon</b>	Principal	American Public Health Association
	<b>Asp, Roland</b>	Alternate	National Fire Sprinkler Association
<b>X</b>	<b>Denhardt, John</b>	Alternate	American Fire Sprinkler Association
	<b>Keays, Jack</b>	Alternate	Vortex Fire Consulting Inc.
	<b>Laramée, Scott</b>	Alternate	American Hotel & Lodging Association
<b>X</b>	<b>Lisinski, Ed*</b>	Alternate	American Wood Council
<b>X</b>	<b>Marks, Maria*</b>	Alternate	National Electrical Manufacturers
<b>X</b>	<b>Pauls, Jake*</b>	Alternate	American Public Health Association
<b>X</b>	<b>Chrisman, Mark*</b>	Nonvoting Member	TC on Building Construction
<b>X</b>	<b>Crowley, Michael</b>	Nonvoting Member	TC on Means of Egress
<b>X</b>	<b>Dawe, Nicholas*</b>	Nonvoting Member	TC on Mercantile and Business
<b>X</b>	<b>Grill, Raymond*</b>	Nonvoting Member	TC on Building Service and Fire Protection
<b>X</b>	<b>Jelenewicz, Chris</b>	Nonvoting Member	TC on Fundamentals
<b>X</b>	<b>Koffel, William*</b>	Nonvoting Member	TC on Health Care Occupancies
<b>X</b>	<b>Lambert, Josh*</b>	Nonvoting Member	TC on Assembly Occupancies
<b>X</b>	<b>Mertens, Matthew*</b>	Nonvoting Member	TC on Educational and Day-Care
<b>X</b>	<b>Puchovsky, Milosh</b>	Nonvoting Member	TC on Interior Finish & Contents
<b>X</b>	<b>Rickard, James*</b>	Nonvoting Member	TC on Building Systems
<b>X</b>	<b>Rickard, John*</b>	Nonvoting Member	TC on Board & Care Facilities
<b>X</b>	<b>Serafim, Janna*</b>	Nonvoting Member	TC on Detention & Correctional
<b>X</b>	<b>Wittasek, Nathan</b>	Nonvoting Member	TC on Fire Protection Features
<b>X</b>	<b>Carr, Kevin</b>	Staff Liaison	National Fire Protection Association

Guests:

Name:

Gregory Harrington	NFPA
Tracy Vecchiarelli	NFPA
Stephen Ganoe	NFPA
Jen Sisco	NFPA
Camille Levy	NFPA
Shane Clary	Bay Alarm Company/NFPA 72
Matt Davy	Arup
Stan Harbuck*	APHA
Rodger Reiswig*	Jonson Controls
Brad Cronin*	Avon MA FD
Chip Carson*	Carson Associates
Michael Pallett*	NFPA Cybersecurity Advisory Committee

\*Participated by teleconference

Total number in attendance: 40





# NATIONAL FIRE PROTECTION ASSOCIATION

The leading information and knowledge resource on fire, electrical and related hazards

## MINUTES

### NFPA Correlating Committee on Safety to Life (SAF-AAC)

#### NFPA 101 First Draft Meeting (A2026)

January 23, 2025  
12 p.m. (ET)

NFPA Headquarters, Quincy, MA and  
Microsoft Teams Remote Meeting

1. **Call to order.** Chair J. Tubbs called the meeting to order at 12 p.m. on January 23, 2025.
2. **Introductions.** G. Harrington, NFPA staff, took attendance.
3. **Chair report.** Chair J. Tubbs welcomed attendees and provided an overview of the meeting.
4. **Staff liaison report.**
  - a. Staff provided an overview of the standards development process, the available actions by the correlating committee, and the A2026 revision cycle schedule.
  - b. No members declared that they had been retained to represent the interest of an entity that would be classified in an interest category different from their own with respect to a specific issue or issues that were addressed by the committee.
5. **Previous meeting minutes.** The minutes of the February 13, 2024, Pre-First Draft meeting were approved as submitted.
6. **Liaison reports.**
  - a. Sprinkler project. W. Koffel reported that the NFPA 13/13R/13D are entering their next revision cycle and are currently open for Public Input. First Draft meetings will be held in August 2025. No apparent conflicts or concerns exist between the 2025 editions and NFPA 101.
  - b. Fire alarm project. S. Clary reported that NFPA 72-2025 has been published along with its full-color handbook. Merton Bunker has termed out as the correlating committee chair. A new chair is to be named at an upcoming Standards Council meeting. First Draft meetings for the next edition are scheduled for July 2025 at a location to be determined. Of potential interest to some NFPA 101 occupancy technical committees, requirements for restricted audible mode operation (RAMO) notification have been added for use where occupants might have an adverse response to sound and light.

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These minutes are considered preliminary until approved at the next committee meeting.

## **7. Correlating Committee task group reports.**

- a. Sprinkler system supervision: J. Hugo. The task group did not meet as its objectives were met last cycle. The task group was discharged with thanks.
- b. Modular rooms/sleep pods: H. Hopper. No report – the task group was retained on the agenda.
- c. Short-term housing rentals: Staff reported the subject was referred to a task group of the Technical Committee on Residential occupancies as the issues appeared to be technical rather than correlative. No correlating committee task group was appointed.

## **8. Correlating Committee direction to all technical committees.**

- a. Separation of vertical buildings. Staff reported the applicable SAF-XXX technical committees reviewed the sections of NFPA 101 noted in item 8.a.i of the BLD/SAF-AAC Pre-First Draft Meeting Agenda for any inconsistencies as they relate to podium or pedestal construction and determined that no revisions were needed.
- b. Fire alarm notification signal terminology (*visual* vs. *visible*) for consistency with NFPA 72. Staff reported the SAF-XXX technical committees reviewed their use of the terms *visual* and *visible* as they relate to fire alarm signals and revised, as needed, to align with NFPA 72, *National Fire Alarm and Signaling Code*. See the NFPA 101 First Draft Report for revisions.
- c. Non-NFPA extracts within NFPA 101. Staff reported that the TC on Fundamentals revised the definition of *occupancy* to remove the extract from ASCE/SEI 7.

## **9. NFPA 101 First Draft.**

- a. No First Correlating Revisions (FCRs) or Correlating Notes (CNs) were developed based on the correlating committee's review of the 101-A2026 TC Responses to Public Inputs, TC Committee Inputs, TC First Revisions, and TC Ballot Final Reports.
- b. Technical committee items.
  - i. TC on Assembly Occupancies (SAF-AXM):
    - 1. FCRs were developed in response to the request by the TC on Assembly Occupancies to modify Table 7.3.1.2 for consistency with the actions on FR-6650 and FR-6651. See the First Draft Report for revisions.
    - 2. The correlating committee reviewed the request by the TC on Assembly Occupancies to revise 7.8.1.1 for coordination with the new 12.2.5.7.10.2 in FR-6653. No action was taken as 12.2.5.7.10.2 applies to new assembly occupancies and 7.8.1.1 applies to both new and existing occupancies. The occupancy chapters can modify core chapter requirements, so no conflict exists. (Note: this request inadvertently appeared as item xi.2 under SAF-MEA in the meeting agenda.)

- ii. TC on Board and Care Facilities (SAF-BCF): The correlating committee reviewed the action on FR-6730 for consistency with FR-6705 at the request of the TC on Board and Care Facilities. No action.
- iii. TC on Building Service and Fire Protection Equipment (SAF-BSF): The correlating committee reviewed the request by the TC on Building Service and Fire Protection Equipment for the appointment of a task group to review the instances of “where permitted/required in Chapters 11 through 43” and “where permitted/required in other section of this code” for consistency. Following discussion, the chair requested staff provide a preliminary review at the correlating committee Second Draft meeting.
- iv. TC on Detention and Correctional Occupancies (SAF-DET): J. Serafim, chair of the TC on Detention and Correctional Occupancies, reported that there were no items for correlating committee review from that technical committee.
- v. TC on Educational and Day-Care Occupancies (SAF-END): The correlating committee reviewed the committee scope revision proposed by the TC on Educational and Day Care Occupancies. Staff noted that at the previous Second Draft meeting, proposed scope revisions for all TCs were submitted for consideration by the Standards Council, however, additional inconsistencies were discovered. A task group was appointed to further review the recommended scope revisions from the previous revision cycle with consideration of the newly proposed revisions by the TC on Educational and Day Care Occupancies. Following the meeting, Chair Tubbs and CC on Building Code Chair P. Willse determined it would be more efficient to appoint a joint correlating committee task group to permit the NFPA 101 and NFPA 5000 TC scopes to be reviewed holistically. The CC on Safety to Life task group that was appointed at the meeting was disbanded, and a new joint task group with the CC on Building Code was appointed. Task group members: M. Marks (TG chair, rep. both correlating committees), S. Harbuck (rep. SAF-AAC), D. Hood (guest TG member), all SAF-XXX technical committee chairs, and all BLD-XXX technical committee chairs.
- vi. TC on Fire Protection Features (SAF-FIR): N. Wittasek, chair of the TC on Fire Protection Features, reported that there were no items for correlating committee review from that technical committee.
- vii. TC on Fundamentals of Safety to Life (SAF-FUN): C. Jelenewicz, chair of the TC on Fundamentals of Safety to Life, reported that there were no items for correlating committee review from that technical committee.
- viii. TC on Health Care Occupancies (SAF-HEA): FCRs and CNs were developed in response to the requests by the TC on Health Care Occupancies (see the First Draft Report for actions):
  - 1. Revise 6.1.6.1 and A.6.1.6.1 for consistency with revisions to the definition of *ambulatory health care occupancy* and its related annex text in 3.3.207.1 and A.3.3.207.1.
  - 2. Revise 7.2.3.12(1) as shown in PI-34 for consistency with the action on 18.2.2.4 in FR-6699 and 19.2.2.4 in FR-6700.

3. Request that SAF-BSF review 9.6.2.6 for any needed clarification regarding the requirement for one manual fire alarm box (see PI-29).
  4. Revise 11.8.5.3.1 for consistency with the new 18.4.3.4 in FR-6634.
- ix. TC on Industrial, Storage, and Miscellaneous Occupancies (SAF-IND): J. Sisco, staff liaison to the Technical Committee on Industrial, Storage, and Miscellaneous Occupancies, reported that there were no items for correlating committee review from that technical committee.
  - x. TC on Interior Finish (SAF-INT): The correlating committee reviewed the request by the TC on Interior Finish and Contents (SAF-INT) for guidance on its scope as it relates to modular room and sleep pod requirements. Following discussion, it was determined that modular room and sleep pod requirements relating to fire performance of interior finish, mattresses, and upholstered furniture should be maintained by SAF-INT. General requirements should be maintained by the TC on Fundamentals of Safety to Life (SAF-FUN). Fire alarm notification requirements should be maintained by the TC on Building Service and Fire Protection Equipment (SAF-BSF). Any occupancy-specific requirements can be maintained by the occupancy technical committees, as needed. Several FCRs were developed to relocate requirements not within the scope of SAF-INT to other chapters as appropriate. See the NFPA 101 First Draft Report for actions.
  - xi. TC on Means of Egress (SAF-MEA): The correlating committee reviewed the request by the TC on Means of Egress to direct the occupancy technical committees to review the turnstile requirements in 7.2.1.11 to determine if they should be referenced in their chapters. The occupancy technical committees are so directed.
  - xii. TC on Mercantile and Business Occupancies (SAF-MER): J. Sisco, staff liaison to the TC on Mercantile and Business Occupancies, reported that there were no items for correlating committee review from that technical committee.
  - xiii. TC on Residential Occupancies (SAF-RES): B. Cronin, acting chair of the TC on Residential Occupancies, reported that there were no items for correlating committee review from that technical committee.
  - xiv. Staff items: The correlating committee reviewed items drafted by staff. See the NFPA 101 First Draft Report for related CNs and FCRs. Additional items were noted as follows:
    1. All occupancy TCs are directed to review 9.6.2.10.3 and 9.6.3.3 as they relate to low frequency alarms and reference as needed at the Second Draft stage.
    2. All occupancy TCs are directed to review Section 9.16 as it relates to gas detection warning systems and NFPA 715 and reference as needed at the Second Draft stage.

**10. Other business.** It was noted that in September 2024, NFPA hosted a symposium to discuss recent proposals across the United States and Canada for local and state amendments to permit taller apartment buildings with only a single exit. The symposium aimed to outline current single exit stair allowances in the United States and in other countries, highlight both the positive aspects and areas of concern for the proposals, and identify any knowledge gaps. A summary report of the symposium is available to download at <https://www.nfpa.org/forms/single-exit-stair-symposium-report>.

**11. Future meetings.** The next correlating committee meeting will be held in December 2025 (dates and location to be determined). The meeting notice will be posted at [www.nfpa.org/101next](http://www.nfpa.org/101next) when the meeting is scheduled.

**12. Adjournment.** The meeting was adjourned at 4:23 p.m. (ET) on January 23, 2025.

### Attendees

	Name:	Office:	Organization:
X	Tubbs, Jeffrey	Chair	Arup
X	Harrington, Gregory	Secretary (Staff-	National Fire Protection Association
X*	Bush, Kenneth	Principal	Maryland State Fire Marshals Office
X*	Carson, Wayne	Principal	Carson Associates, Inc.
X*	Harbuck, Stanley	Principal	American Public Health Association
	Hopper, Howard	Principal	UL Solutions
X*	Hugo, Jeffrey	Principal	National Fire Sprinkler Association
	Lucas, Jeffrey	Principal	International Fire Marshals Association
X*	Reiswig, Rodger	Principal	National Electrical Manufacturers
X*	Rosenbaum, Eric	Principal	American Health Care Association (AHCA)
X*	Savage, Michael	Principal	Marion County Building Safety
	Asp, Roland	Alternate	National Fire Sprinkler Association
X	Davy, Matthew	Alternate	Arup
X*	Marks, Maria	Alternate	National Electrical Manufacturers
X*	Pauls, Jake	Alternate	American Public Health Association
X	Crowley, Michael	Nonvoting Member	TC on Means of Egress
	Dawe, Nicholas	Nonvoting Member	TC on Mercantile & Business Occupancies
X*	Grill, Raymond	Nonvoting Member	TC on Building Service & Fire Protection
X	Jelenewicz, Chris	Nonvoting Member	TC on Fundamentals
X*	Koffel, William	Nonvoting Member	TC on Health Care Occupancies

<b>X*</b>	<b>Lambert, Josh</b>	Nonvoting Member	TC on Assembly Occupancies
<b>X*</b>	<b>Mertens, Matthew</b>	Nonvoting Member	TC on Educational & Day-Care
<b>X</b>	<b>Puchovsky, Milosh</b>	Nonvoting Member	TC on Interior Finish & Contents
<b>X*</b>	<b>Rickard, John</b>	Nonvoting Member	TC on Board & Care Facilities
<b>X*</b>	<b>Serafim, Janna</b>	Nonvoting Member	TC on Detention & Correctional
<b>X</b>	<b>Wittasek, Nathan</b>	Nonvoting Member	TC on Fire Protection Features
<b>X</b>	<b>Clary, Shane</b>	Alt. to Nonvoting	Signaling Systems Correlating Committee

Guests:

Name:

<b>Brad Cronin*</b>	Avon, MA FD
<b>John Denhardt</b>	American Fire Sprinkler Association
<b>David Frable*</b>	GSA
<b>Raymond Hansen</b>	US Department of the Air Force
<b>David Hood*</b>	Jensen Hughes rep AHCA
<b>Ed Lisinski*</b>	American Wood Council
<b>Richard Roberts*</b>	Honeywell
<b>Jon Taluba</b>	Chichester Fire
<b>David Tyree</b>	American Wood Council
<b>Peter Willse*</b>	Portland FM's Office
<b>Kevin Carr</b>	NFPA
<b>Stephen Ganoe</b>	NFPA
<b>Camille Levy</b>	NFPA
<b>Jennifer Sisco</b>	NFPA
<b>Tracy Vecchiarelli</b>	NFPA

**\* DENOTES ATTENDED REMOTELY**

**TOTAL NUMBER IN ATTENDANCE: 36 (15 IN PERSON, 21 REMOTE)**



## Public Comment No. 125-NFPA 101-2025 [ New Section after 14.2.2.2.3.3 ]

### Locks used only for Emergency Lockdown purposes

Locks used only for Emergency Lockdown purposes in accordance with (proposed [ New Section after 7.2.1.6.4.2 ] shall be permitted.

### Statement of Problem and Substantiation for Public Comment

Special locking arrangements provided in (proposed [ New Section after 7.2.1.6.4.2 ] provides extra protections for educational occupancies during emergency lockdown situations such as active shooter incidents. Corrects deficiencies associated with Releasing mechanism height requirements and disparities associated with Two movement egress.

### Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 102-NFPA 101-2025 [New Section after 7.2.1.6.4.2]	

#### Related Item

- Special Locking Arrangements

### Submitter Information Verification

**Submitter Full Name:** Jack Taylor

**Organization:** Nightlock

**Affiliation:** Nightlock

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Tue Jun 03 09:18:25 EDT 2025

**Committee:** SAF-END



## Public Comment No. 114-NFPA 101-2025 [ Section No. 14.2.2.2.4 ]

### 14.2.2.2.4\* Locking of Classroom Doors and Doors to Other Instructional Spaces.

Classroom doors and doors to other instructional spaces shall be permitted to be locked to prevent unwanted entry, provided that the locking means is approved and all of the following conditions are met:

- (1) The locking means shall be capable of being engaged from the egress side of the door without opening the door.
- (2) The unlocking and unlatching from the egress side of the door shall be accomplished without the use of a key, a tool, or special knowledge or effort.
- (3) The Two releasing mechanism shall open the door leaf with not more than one releasing motion motions shall be permitted where approved by the authority having jurisdiction provided that releasing does not require simultaneous operations, and provided the door is not equipped with panic hardware or fire exit hardware .
- (4) The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor, unless otherwise permitted by (proposed [ New Section after 7 . 2.1.6.4.2 ]).
- (5) Locks, if remotely engaged, shall be unlockable from the egress side of the door without the use of a key, a tool, or special knowledge or effort.
- (6) The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.
- (7) The locking means shall not impair the operation or affect the listing of the door closer, lockset, panic hardware, or fire exit hardware.
- (8) Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.
- (9) The emergency action plan, required by 14.7.1, shall address the use of the locking and unlocking means from both sides of the door.
- (10) Staff shall be drilled in the engagement and release of the locking means, from both sides of the door, as part of the emergency egress drills required by 14.7.2.
- (11) Locks used only for emergency lockdown purposes, and not used for normal operations, are permitted at any height in compliance with (proposed [ New Section after 7.2.1.6.4.2 ] , provided that all of the following are met: (A) The locking means shall only be used in an emergency lockdown situation and during lockdown drills. (B) The locking means shall be removable and not permanently mounted to the door, although individual parts of the locking means assembly, including but not limited to bolts, stops, brackets, and pins that do not prevent normal function of the door, may be permanently mounted. (C) The locking means shall only be used for a finite period of time.

### Statement of Problem and Substantiation for Public Comment

Two releasing motions should be allowed in all occupancies while using secondary or supplemental locking means for extra protection during active shooter intruder lockdown situations. The first draft presents a disparity of fairness between new and existing educational occupancies. Locks used only for emergency lockdown purposes that cause a two movement egress scenario provided extra protections during emergency lockdown incidents to Existing Educational occupancies but New Educational occupancies were deprived of the same extra protections. Protective measures should be



provided equally to all occupants. Locks used only for emergency lockdown purposes are consider to be an economical and affordable locking means, and should be equally available to New or Existing Educational occupancies.

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 112-NFPA 101-2025 [Section No. 7.2.1.5.3.8]	
Public Comment No. 102-NFPA 101-2025 [New Section after 7.2.1.6.4.2]	

Related Item

- Special Locking Arrangements

Submitter Information Verification

**Submitter Full Name:** Jack Taylor  
**Organization:** Nightlock  
**Affiliation:** Nightlock  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Mon Jun 02 23:29:00 EDT 2025  
**Committee:** SAF-END



## Public Comment No. 108-NFPA 101-2025 [ New Section after 14.3.7.3 ]

### **14.3.8 In-Building Emergency Responder Communication Enhancement Systems**

**14.3.8.1 In-Building Emergency Responder Communication Enhancement Systems (ERCES) shall comply with Section 14.3.8 and section 9.15.**

**14.3.8.1.2 ERCES is not required to be installed where the existing public safety communication system utilized by the jurisdiction does not have an operational signal at the exterior of the building as defined by the AHJ and the Frequency License Holder.**

### **14.3.8.2 Evaluation Testing.**

#### **14.3.8.2.1 Evaluation Testing of Buildings for Compliant Coverage.**

**14.3.8.2.1.1\* An evaluation of the education occupancy shall be conducted to determine if adequate RF coverage by the Public Safety Communications System exists within the occupancy to meet the requirements of NFPA 1225 Section 18.8 and Section 18.9 prior to requiring an emergency responder communications enhancement system be installed within the occupancy.**

**A.14.3.8.2.1.1 Buildings can be evaluated during the later phase of construction for a preliminary indication as to whether an ERCES will be required.**

**To accurately evaluate the need of an ERCES in a new building, the building should be complete and in the final occupancy condition. For example, building equipment, furniture, fixtures, and contents can affect the RF signal quality and strength. As this condition does not typically exist until after the Certification of Occupancy (CoO) is issued, the AHJ should make an ERCES evaluation a condition on this issuance of the building permit for the construction of the new building and as a condition on CoO issuance. If a CoO is going to be issued and an ERCES evaluation will still need to occur post CoO issuance, the building owner should also be informed of this requirement.**

**If an ERCES evaluation is done prior to the issuance of a CoO and it is found an ERCES is required, the AHJ should work with the contractor and owner to allow the issuance of the CoO while the ERCES is being installed. One method to deal with this is for a separate permit to be issued for the ERCES installation that would continue in force after the issuance of the CoO.**

**14.3.8.2.1.2 Where the occupancy does not have sufficient signal strength and quality based on an evaluation conducted in accordance with 11.11.3.2, an approved ERCES shall be installed in accordance with section 9.15.**

**14.3.8.2.1.3 ERCES shall not be required in above ground single-story occupancies less than 20,000 gross ft<sup>2</sup>.**

## Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
SAF-END_New_ERCES_Public_Comment.docx	PC-108 SAF-END New ERCES	

## Statement of Problem and Substantiation for Public Comment

This public comment (PC) is submitted on behalf of the SAF-END ERCES task group. It seeks to meet the intent of CI-6595 and PI-345 to ensure that ERCES are only installed when needed and complies with Federal Communications Commission (FCC) regulations. However, CI-6595 needed to be modified with clear and enforceable language for the AHJ and the Frequency License Holder. The SAF-END ERCES task group agreed to utilize the language in PC-50 for the 2027 edition of NFPA 1 for several reasons.

1. To determine if adequate RF coverage supplied by the Public Safety Communications System exists within the occupancy is to perform a building evaluation in accordance with NFPA 1225 Section 18.8 and Section 18.9.
2. Exempts smaller above ground single-story occupancies less than 20,000 gross ft<sup>2</sup>.

### Related Item

- CI-6595 and PI-345

## Submitter Information Verification

**Submitter Full Name:** Richard Roberts  
**Organization:** Honeywell Fire Safety  
**Affiliation:** SAF-END ERCES Task Group (TG)  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Mon Jun 02 16:30:45 EDT 2025  
**Committee:** SAF-END

### **14.3.8 In-Building Emergency Responder Communication Enhancement Systems**

**14.3.8.1** In-Building Emergency Responder Communication Enhancement Systems (ERCES) shall comply with Section 14.3.8 and section 9.15.

**14.3.8.1.2** ERCES is not required to be installed where the existing public safety communication system utilized by the jurisdiction does not have an operational signal at the exterior of the building as defined by the AHJ and the Frequency License Holder.

#### **14.3.8.2 Evaluation Testing.**

##### **14.3.8.2.1 Evaluation Testing of Buildings for Compliant Coverage.**

**14.3.8.2.1.1\*** An evaluation of the education occupancy shall be conducted to determine if adequate RF coverage by the Public Safety Communications System exists within the occupancy to meet the requirements of NFPA 1225 Section 18.8 and Section 18.9 prior to requiring an emergency responder communications enhancement system be installed within the occupancy.

**A.14.3.8.2.1.1** Buildings can be evaluated during the later phase of construction for a preliminary indication as to whether an ERCES will be required.

To accurately evaluate the need of an ERCES in a new building, the building should be complete and in the final occupancy condition. For example, building equipment, furniture, fixtures, and contents can affect the RF signal quality and strength. As this condition does not typically exist until after the Certification of Occupancy (CoO) is issued, the AHJ should make an ERCES evaluation a condition on this issuance of the building permit for the construction of the new building and as a condition on CoO issuance . If a CoO is going to be issued and an ERCES evaluation will still need to occur post CoO issuance, the building owner should also be informed of this requirement.

If an ERCES evaluation is done prior to the issuance of a CoO and it is found an ERCES is required, the AHJ should work with the contractor and owner to allow the issuance of the CoO while the ERCES is being installed. One method to deal with this is for a separate permit to be issued for the ERCES installation that would continue in force after the issuance of the CoO.

**14.3.8.2.1.2** Where the occupancy does not have sufficient signal strength and quality based on an evaluation conducted in accordance with 11.11.3.2, an approved ERCES shall be installed in accordance with section 9.15.

**14.3.8.2.1.3** ERCES shall not be required in above ground single-story occupancies less than 20,000 gross ft<sup>2</sup>.

**Reason Statement.** This public comment (PC) is submitted on behalf of the SAF-END ERCES task group. It seeks to meet the intent of CI-6595 and PI-345 to ensure that ERCES are **only** installed when needed and complies with Federal Communications Commission (FCC) regulations.

However, CI-6595 needed to be modified with clear and enforceable language for the AHJ and the Frequency License Holder. The SAF-END ERCES task group agreed to utilize the language in PC-50 for the 2027 edition of NFPA 1 for several reasons.

1. To determine if adequate RF coverage supplied by the Public Safety Communications System exists within the occupancy is to perform a building evaluation in accordance with NFPA 1225 Section 18.8 and Section 18.9.
2. Exempts smaller above ground single-story occupancies less than 20,000 gross ft<sup>2</sup>.

**Text not related to Correlating Note - see FR on following pages**



## Public Comment No. 13-NFPA 101-2025 [ Section No. 14.7.1.2 ]

### 14.7.1.2

A hazard/risk assessment shall be performed for all educational occupancies as part of the development of the emergency action plan.

### Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
101_A2026_SAF_AAC_CCN_22.pdf	101_CC NOTE22	

### Statement of Problem and Substantiation for Public Comment

NOTE: The following CC Note No. 22 Appeared in the First Draft Report on First Revisions No. 6715.

Consider replacing "the appropriate stakeholders" with enforceable language.

#### Related Item

- FR 6715

### Submitter Information Verification

**Submitter Full Name:** CC Notes

**Organization:** Notes

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Thu Mar 06 10:16:55 EST 2025

**Committee:** SAF-END



## Correlating Committee Note No. 22-NFPA 101-2025 [ New Section after 14.7.1.2 ]

### Submitter Information Verification

**Committee:** SAF-AAC

**Submittal Date:** Fri Jan 24 10:10:52 EST 2025

### Committee Statement and Meeting Notes

**Committee Statement:** Consider replacing "the appropriate stakeholders" with enforceable language.

First Revision No. 6715-NFPA 101-2024 [New Section after 14.7.1.2]

### Ballot Results

✓ **This item has passed ballot**

10 Eligible Voters

0 Not Returned

10 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

#### **Affirmative All**

Bush, Kenneth E.

Carson, Wayne G. Chip

Harbuck, Stanley C.

Hopper, Howard

Hugo, Jeffrey M.

Lucas, Jeffrey A.

Reiswig, Rodger

Rosenbaum, Eric R.

Savage, Sr., Michael L.

Tubbs, Jeffrey S.



## First Revision No. 6715-NFPA 101-2024 [ New Section after 14.7.1.2 ]

### 14.7.1.4\*

Emergency action plans shall be reviewed and approved annually by the appropriate stakeholders.

#### A.14.7.1.4

The appropriate stakeholders can include the following:

- (1) School board or the board's designee
- (2) School district representative or official designee
- (3) School principal
- (4) Education-related organization or association deemed appropriate by the school district
- (5) Representatives from all local first responder organizations to participate, advise, and consult in the review process, including, but not limited to the following:
  - (a) Local fire department
  - (b) Local law enforcement
  - (c) Local emergency medical services
  - (d) Other member of the first responder or emergency management community

The purpose of this annual review should be to review and update the emergency action plans, protocols, and procedures and the emergency egress drill programs and each of its school buildings. The plan should also include the description of actions taken (i.e., the training provided and the materials used) to ensure all students, staff members, first responders, and visitors, both inside and outside the school building, are provided with the following information:

- (1) An alert to the fact that an emergency exists.
- (2) Instructions on how to proceed, including supplemental instructions from first responders, and respond appropriately to the directions given. (Each drill is to test whether the notification system and those operating it are prepared to provide emergency notification and appropriate direction to everyone on the property, based on the emergency conditions that exist and whether those present respond accordingly.)
- (3) When evacuation is called for, instructions to ensure that evacuation of the building and adjacent areas is complete; that alternate exit routes are used if primary routes are obstructed; and that individuals with physical impairments reach safe areas. (Each drill is to test whether and how quickly a building's occupants vacate it in an orderly and safe manner, regardless of any obstructions encountered, and whether staff is prepared to provide assistance effectively to those who are unable to evacuate on their own.)
- (4) When sheltering in place is called for, instructions to ensure that all the building's occupants reach designated safe areas in a reasonable amount of time. (Each drill is to test whether students are prepared to respond without hesitation to instructions.)

The report submitted should indicate whether each component listed in the plan is present and up to date and should describe the revisions, if any, that are needed in each. If any component is deemed inapplicable by the review participants, the report should include the rationale for this determination. The plan should be stored in locations where it can be easily obtained during times of emergency, whether hard copies, electronic, or both.



## Supplemental Information

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
101_Ch.14_FR-6715.docx		
101_Ch.14_FR-6715_END.docx	For prod use	

## Submitter Information Verification

**Committee:** SAF-END

**Submittal Date:** Tue Jul 23 20:55:40 EDT 2024

## Committee Statement and Meeting Notes

**Committee Statement:** It was felt that guidance was needed for educational occupancies related to emergency action plans, such as who should be involved in their development and the topics that should be covered. The need for an annual review was considered important because educational occupancies and the relevant stakeholders are subject to change.

**Response Message:** FR-6715-NFPA 101-2024

Public Input No. 192-NFPA 101-2024 [Section No. 14.7.1]

## Ballot Results

✔ This item has passed ballot

25 Eligible Voters

7 Not Returned

18 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

### Not Returned

Blaser, Scott J.

Frangiamore, Keith S.

Frye, Laura

Hansen, Raymond N.

Hebert, Tyler James

Hopper, Howard

Szachnowicz, Aleksy L.

### Affirmative All

Abedeen, Zainul

Aler, Clay P.

Alsulaiti, Mohammed

Beddow, Dorn J

Dannaway, Samuel S.

DiMisa, Richard M.

Ellis, Jason D.

Gammon, James D.

Haidacher, Jeffrey L.

Julka, Terrence J.

Marks, Maria B.

Mertens, Matthew J.

Oviedo Vela, Guillermo Antonio

Ramseur, Mitchell

Rietz, Larry D.

Roeper, Kurt A.

Savage, Sr., Michael L.

Stashak, Catherine L.

## **Editorial Comment**

[Click here](#)



## Public Comment No. 117-NFPA 101-2025 [ New Section after 15.2.2.2.3.3 ]

### Locks used only for Emergency Lockdown purposes

Locks used only for Emergency Lockdown purposes in accordance with (proposed [ New Section after 7.2.1.6.4.2 ] shall be permitted.

### Statement of Problem and Substantiation for Public Comment

Special locking arrangements provided in (proposed [ New Section after 7.2.1.6.4.2 ] provides extra protections for educational occupancies during emergency lockdown situations such as active shooter incidents. Corrects deficiencies associated with Releasing mechanism height requirements and disparities associated with Two movement egress.

### Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 102-NFPA 101-2025 [New Section after 7.2.1.6.4.2]	

#### Related Item

- Special Locking Arrangements

### Submitter Information Verification

**Submitter Full Name:** Jack Taylor

**Organization:** Nightlock

**Affiliation:** Nightlock

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Tue Jun 03 00:51:29 EDT 2025

**Committee:** SAF-END



## Public Comment No. 118-NFPA 101-2025 [ Section No. 15.2.2.2.4.1 ]

### 15.2.2.2.4.1

Classroom doors and doors to other instructional spaces shall be permitted to be locked to prevent unwanted entry provided that the locking means is approved and all of the following conditions are met:

- (1) The locking means shall be capable of being engaged from the egress side of the door without opening the door.
- (2) The unlocking and unlatching from the egress side of the door shall be accomplished without the use of a key, a tool, or special knowledge or effort.
- (3)\* Two releasing motions shall be permitted where approved by the authority having jurisdiction provided that releasing does not require simultaneous operations, and provided the door is not equipped with panic hardware or fire exit hardware.
- (4) The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor, unless otherwise permitted by (proposed [ New Section after 7.2.1.6.4.2 ] ).
- (5) Locks, if remotely engaged, shall be unlockable from the egress side of the door without the use of a key, a tool, or special knowledge or effort.
- (6) The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.
- (7) The locking means shall not impair the operation or affect the listing of the door closer, lockset, panic hardware, or fire exit hardware.
- (8) Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.
- (9) The emergency action plan, required by 15.7.1, shall address the use of the locking and unlocking means from both sides of the door.
- (10) Staff shall be drilled in the engagement and release of the locking means, from both sides of the door, as part of the emergency egress drills required by 15.7.2.
- (11) Locks used only for emergency lockdown purposes, and not used for normal operations, are permitted at any height in compliance with (proposed [ New Section after 7.2.1.6.4.2 ] ) , provided that all of the following are met: (A) The locking means shall only be used in an emergency lockdown situation and during lockdown drills. (B) The locking means shall be removable and not permanently mounted to the door, although individual parts of the locking means assembly, including but not limited to bolts, stops, brackets, and pins that do not prevent normal function of the door, may be permanently mounted. (C) The locking means shall only be used for a finite period of time.

### Statement of Problem and Substantiation for Public Comment

Locks used only for Emergency Lockdown purposes, and not used for normal operation, should not be subject to releasing mechanism height requirements of 34" inches to 48" inches above the finished floor. This height requirement presents a safety hazard during emergency lockdown events where occupants are sheltering in place. An assailant may easily reach through a broken window to unlock and breach the locked door. This locking means is portable and not permanently attached to the door. It is a non-fixed element and only deployed during active shooter intruder lockdown situations and lockdown drills , and it should be permitted at any height. Low to the floor and out of reach but still

releasable from outside the room with a key or other credential. Locks mounted at 34" to 48" have been compromised during active shooter incidents. The locking means release mechanism being removable at all times is never locked on the egress side of the door. And requires no special knowledge or effort to release.

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<a href="#">Public Comment No. 102-NFPA 101-2025 [New Section after 7.2.1.6.4.2]</a>	
<a href="#">Public Comment No. 111-NFPA 101-2025 [Section No. 7.2.1.5.3.1]</a>	
<a href="#">Public Comment No. 122-NFPA 101-2025 [Section No. 15.2.2.2.4.2]</a>	

Related Item

- Special Locking Arrangements

Submitter Information Verification

**Submitter Full Name:** Jack Taylor  
**Organization:** Nightlock  
**Affiliation:** Nightlock  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Tue Jun 03 00:57:13 EDT 2025  
**Committee:** SAF-END



## Public Comment No. 122-NFPA 101-2025 [ Section No. 15.2.2.2.4.2 ]

### 15.2.2.2.4.2 –

Where existing classroom doors and doors to instructional spaces are replaced, they shall comply with the provisions of 14.2.2.2.4 .

## Statement of Problem and Substantiation for Public Comment

This section will not be needed if 15.2.2.2.4.1 proposed modifications are accepted.

## Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<u>Public Comment No. 118-NFPA 101-2025 [Section No. 15.2.2.2.4.1]</u>	

### Related Item

- Special Locking Arrangements

## Submitter Information Verification

**Submitter Full Name:** Jack Taylor

**Organization:** Nightlock

**Affiliation:** Nightlock

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Tue Jun 03 01:51:28 EDT 2025

**Committee:** SAF-END



## Public Comment No. 107-NFPA 101-2025 [ New Section after 15.3.7.3 ]

### **15.3.8 In-Building Emergency Responder Communication Enhancement Systems**

**15.3.8.1 In-Building Emergency Responder Communication Enhancement Systems (ERCES) shall comply with Section 14.3.8 and section 9.15.**

**15.3.8.1.2 ERCES is not required to be installed where the existing public safety communication system utilized by the jurisdiction does not have an operational signal at the exterior of the building as defined by the AHJ and the Frequency License Holder.**

#### **15.3.8.2 Evaluation Testing.**

##### **15.3.8.2.1 Evaluation Testing of Buildings for Compliant Coverage.**

**15.3.8.2.1.1\* An evaluation of the education occupancy shall be conducted to determine if adequate RF coverage by the Public Safety Communications System exists within the occupancy to meet the requirements of NFPA 1225 Section 18.8 and Section 18.9 prior to requiring an emergency responder communications enhancement system be installed within the occupancy.**

**A.15.3.8.2.1.1 Buildings can be evaluated during the later phase of construction for a preliminary indication as to whether an ERCES will be required.**

**To accurately evaluate the need of an ERCES in a new building, the building should be complete and in the final occupancy condition. For example, building equipment, furniture, fixtures, and contents can affect the RF signal quality and strength. As this condition does not typically exist until after the Certification of Occupancy (CoO) is issued, the AHJ should make an ERCES evaluation a condition on this issuance of the building permit for the construction of the new building and as a condition on CoO issuance. If a CoO is going to be issued and an ERCES evaluation will still need to occur post CoO issuance, the building owner should also be informed of this requirement.**

**If an ERCES evaluation is done prior to the issuance of a CoO and it is found an ERCES is required, the AHJ should work with the contractor and owner to allow the issuance of the CoO while the ERCES is being installed. One method to deal with this is for a separate permit to be issued for the ERCES installation that would continue in force after the issuance of the CoO.**

**15.3.8.2.1.2 Where the occupancy does not have sufficient signal strength and quality based on an evaluation conducted in accordance with 11.11.3.2, an approved ERCES shall be installed in accordance with section 9.15.**

**15.3.8.2.1.3 ERCES shall not be required in above ground single-story occupancies less than 50,000 gross ft<sup>2</sup>.**

## Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
SAF- END_Existing_ERCES_Public_Comment_v2.docx	Word Document for ERCES PC	

## Statement of Problem and Substantiation for Public Comment

This public comment (PC) is submitted on behalf of the SAF-END ERCES task group. It seeks to meet the intent of CI-6597 and PI-344 to ensure that ERCES are only installed when needed and complies with Federal Communications Commission (FCC) regulations. However, section 15.3.8.1 in CI-6595 needed to be modified with clear and enforceable language for the AHJ and the Frequency License Holder. The SAF-END ERCES task group agreed to utilize the language in PC-50 for the 2027 edition of NFPA 1 for several reasons.

1. To determine if adequate RF coverage supplied by the Public Safety Communications System exists within the occupancy is to perform a building evaluation in accordance with NFPA 1225 Section 18.8 and Section 18.9.
2. Exempts smaller above ground single-story occupancies less than 50,000 gross ft<sup>2</sup>.

### Related Item

- CI-6597 and PI-344

## Submitter Information Verification

**Submitter Full Name:** Richard Roberts  
**Organization:** Honeywell Fire Safety  
**Affiliation:** SAF-END ERCES Task Group (TG)  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Mon Jun 02 16:24:54 EDT 2025  
**Committee:** SAF-END



### **15.3.8 In-Building Emergency Responder Communication Enhancement Systems**

**15.3.8.1** In-Building Emergency Responder Communication Enhancement Systems (ERCES) shall comply with Section 14.3.8 and section 9.15.

**15.3.8.1.2** ERCES is not required to be installed where the existing public safety communication system utilized by the jurisdiction does not have an operational signal at the exterior of the building as defined by the AHJ and the Frequency License Holder.

#### **15.3.8.2 Evaluation Testing.**

##### **15.3.8.2.1 Evaluation Testing of Buildings for Compliant Coverage.**

**15.3.8.2.1.1\*** An evaluation of the education occupancy shall be conducted to determine if adequate RF coverage by the Public Safety Communications System exists within the occupancy to meet the requirements of NFPA 1225 Section 18.8 and Section 18.9 prior to requiring an emergency responder communications enhancement system be installed within the occupancy.

**A.15.3.8.2.1.1** Buildings can be evaluated during the later phase of construction for a preliminary indication as to whether an ERCES will be required.

To accurately evaluate the need of an ERCES in a new building, the building should be complete and in the final occupancy condition. For example, building equipment, furniture, fixtures, and contents can affect the RF signal quality and strength. As this condition does not typically exist until after the Certification of Occupancy (CoO) is issued, the AHJ should make an ERCES evaluation a condition on this issuance of the building permit for the construction of the new building and as a condition on CoO issuance. If a CoO is going to be issued and an ERCES evaluation will still need to occur post CoO issuance, the building owner should also be informed of this requirement.

If an ERCES evaluation is done prior to the issuance of a CoO and it is found an ERCES is required, the AHJ should work with the contractor and owner to allow the issuance of the CoO while the ERCES is being installed. One method to deal with this is for a separate permit to be issued for the ERCES installation that would continue in force after the issuance of the CoO.

**15.3.8.2.1.2** Where the occupancy does not have sufficient signal strength and quality based on an evaluation conducted in accordance with 11.11.3.2, an approved ERCES shall be installed in accordance with section 9.15.

**15.3.8.2.1.3** ERCES shall not be required in above ground single-story occupancies less than 50,000 gross ft<sup>2</sup>.

**Reason Statement.** This public comment (PC) is submitted on behalf of the SAF-END ERCES task group. It seeks to meet the intent of CI-6597 and PI-344 to ensure that ERCES are **only** installed

when needed and complies with Federal Communications Commission (FCC) regulations. However, section 15.3.8.1 in CI-6595 needed to be modified with clear and enforceable language for the AHJ and the Frequency License Holder. The SAF-END ERCES task group agreed to utilize the language in PC-50 for the 2027 edition of NFPA 1 for several reasons.

1. To determine if adequate RF coverage supplied by the Public Safety Communications System exists within the occupancy is to perform a building evaluation in accordance with NFPA 1225 Section 18.8 and Section 18.9.
2. Exempts smaller above ground single-story occupancies less than 50,000 gross ft<sup>2</sup>.

**Text not related to Correlating Note - see FR on following pages**



## Public Comment No. 14-NFPA 101-2025 [ Section No. 15.7.1.2 ]

### 15.7.1.2

A hazard/risk assessment shall be performed for all existing educational occupancies as part of the development of the emergency action plan.

### Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
101_A2026_SAF_AAC_CCN_23.pdf	101_CC NOTE23	

### Statement of Problem and Substantiation for Public Comment

NOTE: The following CC Note No. 23 Appeared in the First Draft Report on First Revisions No. 6722.

Consider replacing "the appropriate stakeholders" with enforceable language.

#### Related Item

- FR 6722

### Submitter Information Verification

**Submitter Full Name:** CC Notes

**Organization:** Notes

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Thu Mar 06 10:24:05 EST 2025

**Committee:** SAF-END



## Correlating Committee Note No. 23-NFPA 101-2025 [ New Section after 15.7.1.2 ]

### Submitter Information Verification

**Committee:** SAF-AAC

**Submittal Date:** Fri Jan 24 10:12:56 EST 2025

### Committee Statement and Meeting Notes

**Committee Statement:** Consider replacing "the appropriate stakeholders" with enforceable language.

First Revision No. 6722-NFPA 101-2024 [New Section after 15.7.1.2]

### Ballot Results

✓ **This item has passed ballot**

10 Eligible Voters

0 Not Returned

10 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

#### **Affirmative All**

Bush, Kenneth E.

Carson, Wayne G. Chip

Harbuck, Stanley C.

Hopper, Howard

Hugo, Jeffrey M.

Lucas, Jeffrey A.

Reiswig, Rodger

Rosenbaum, Eric R.

Savage, Sr., Michael L.

Tubbs, Jeffrey S.



## First Revision No. 6722-NFPA 101-2024 [ New Section after 15.7.1.2 ]

### 15.7.1.4\*

Emergency action plans shall be reviewed and approved annually by the appropriate stakeholders.

#### A.15.7.1.4

The appropriate stakeholders can include the following:

- (1) School board or the board's designee
- (2) School district representative or official designee
- (3) School principal
- (4) Education-related organization or association deemed appropriate by the school district
- (5) Representatives from all local first responder organizations to participate, advise, and consult in the review process, including, but not limited to the following:
  - (a) Local fire department
  - (b) Local law enforcement
  - (c) Local emergency medical services
  - (d) Other member of the first responder or emergency management community

The purpose of this annual review should be to review and update the emergency action plans, protocols, and procedures and the emergency egress drill programs and each of its school buildings. The plan should also include the description of actions taken (i.e., the training provided and the materials used) to ensure all students, staff members, first responders, and visitors, both inside and outside the school building, are provided with the following information:

- (1) An alert to the fact that an emergency exists.
- (2) Instructions on how to proceed, including supplemental instructions from first responders, and respond appropriately to the directions given. (Each drill is to test whether the notification system and those operating it are prepared to provide emergency notification and appropriate direction to everyone on the property, based on the emergency conditions that exist and whether those present respond accordingly.)
- (3) When evacuation is called for, instructions to ensure that evacuation of the building and adjacent areas is complete; that alternate exit routes are used if primary routes are obstructed; and that individuals with physical impairments reach safe areas. (Each drill is to test whether and how quickly a building's occupants vacate it in an orderly and safe manner, regardless of any obstructions encountered, and whether staff is prepared to provide assistance effectively to those who are unable to evacuate on their own.)
- (4) When sheltering in place is called for, instructions to ensure that all the building's occupants reach designated safe areas in a reasonable amount of time. (Each drill is to test whether students are prepared to respond without hesitation to instructions.)

The report submitted should indicate whether each component listed in the plan is present and up to date and should describe the revisions, if any, that are needed in each. If any component is deemed inapplicable by the review participants, the report should include the rationale for this determination. The plan should be stored in locations where it can be easily obtained during times of emergency, whether hard copies, electronic, or both.

## Supplemental Information

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
101_Ch.15_FR-6722.docx		
101_Ch.15_FR-6722_END.docx	For prod use	

## Submitter Information Verification

**Committee:** SAF-END

**Submittal Date:** Wed Jul 24 10:06:02 EDT 2024

## Committee Statement and Meeting Notes

**Committee Statement:** It was felt that guidance was needed for educational occupancies related to emergency action plans, such as who should be involved in their development and the topics that should be covered. The need for an annual review was considered important because educational occupancies and the relevant stakeholders are subject to change.

**Response Message:** FR-6722-NFPA 101-2024

Public Input No. 193-NFPA 101-2024 [Section No. 15.7.1]

## Ballot Results

✔ This item has passed ballot

25 Eligible Voters

7 Not Returned

18 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

### Not Returned

Blaser, Scott J.

Frangiamore, Keith S.

Frye, Laura

Hansen, Raymond N.

Hebert, Tyler James

Hopper, Howard

Szachnowicz, Aleksy L.

### Affirmative All

Abedeen, Zainul

Aler, Clay P.

Alsulaiti, Mohammed

Beddow, Dorn J

Dannaway, Samuel S.

DiMisa, Richard M.

Ellis, Jason D.

Gammon, James D.

Haidacher, Jeffrey L.

Julka, Terrence J.

Marks, Maria B.

Mertens, Matthew J.

Oviedo Vela, Guillermo Antonio

Ramseur, Mitchell

Rietz, Larry D.

Roeper, Kurt A.

Savage, Sr., Michael L.

Stashak, Catherine L.

## **Editorial Comment**

[Click here](#)



## Public Comment No. 115-NFPA 101-2025 [ New Section after 16.2.2.2.3.3 ]

### Locks used only for Emergency Lockdown purposes

Locks used only for Emergency Lockdown purposes in accordance with (proposed [ New Section after 7.2.1.6.4.2 ] shall be permitted.

### Statement of Problem and Substantiation for Public Comment

Special locking arrangements provided in (proposed [ New Section after 7.2.1.6.4.2 ] provides extra protections for Day-care occupancies during emergency lockdown situations such as active shooter incidents. Corrects deficiencies associated with Releasing mechanism height requirements and disparities associated with Two movement egress.

### Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<u>Public Comment No. 102-NFPA 101-2025 [New Section after 7.2.1.6.4.2]</u>	
<u>Public Comment No. 112-NFPA 101-2025 [Section No. 7.2.1.5.3.8]</u>	

#### Related Item

- Special Locking Arrangements

### Submitter Information Verification

**Submitter Full Name:** Jack Taylor

**Organization:** Nightlock

**Affiliation:** Nightlock

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Tue Jun 03 00:05:24 EDT 2025

**Committee:** SAF-END





## Public Comment No. 116-NFPA 101-2025 [ Section No. 16.2.2.2.6 ]

### 16.2.2.2.6 Locking of Classroom Doors and Doors to Other Client Care Spaces.

Classroom doors and doors to other client care spaces shall be permitted to be locked to prevent unwanted entry provided that the locking means is approved and all of the following conditions are met:

- (1) The locking means shall be capable of being engaged from the egress side without opening the door.
- (2) The unlocking and unlatching from the egress side of the door shall be accomplished without the use of a key, a tool, or special knowledge or effort.
- (3) The Two releasing mechanism shall open the door leaf with not more than one releasing motion motions shall be permitted where approved by the authority having jurisdiction provided that releasing does not require simultaneous operations, and provided the door is not equipped with panic hardware or fire exit hardware .
- (4) The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor, unless otherwise permitted by (proposed [ New Section after 7 . 2.1.6.4.2 ] ).
- (5) Locks, if remotely engaged, shall be unlockable from the egress side of the door without the use of a key, a tool, or special knowledge or effort.
- (6) The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.
- (7) The locking means shall not impair the operation or affect the listing of the door closer, lockset, panic hardware, or fire exit hardware.
- (8) Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.
- (9) The emergency action plan, required by 16.7.1, shall address the use of the locking and unlocking means from both sides of the door.
- (10) Staff shall be drilled in the engagement and release of the locking means, from both sides of the door, as part of the emergency egress drills required by 16.7.2.
- (11) Locks used only for emergency lockdown purposes, and not used for normal operations, are permitted at any height in compliance with (proposed [ New Section after 7.2.1.6.4.2 ] ) , provided that all of the following are met: (A) The locking means shall only be used in an emergency lockdown situation and during lockdown drills. (B) The locking means shall be removable and not permanently mounted to the door, although individual parts of the locking means assembly, including but not limited to bolts, stops, brackets, and pins that do not prevent normal function of the door, may be permanently mounted. (C) The locking means shall only be used for a finite period of time.

### Statement of Problem and Substantiation for Public Comment

Two releasing motions should be allowed in all occupancies while using secondary or supplemental locking means for extra protection during active shooter intruder lockdown situations. The first draft presents a disparity of fairness between new and existing Day-care occupancies. Locks used only for emergency lockdown purposes that cause a two movement egress scenario provided extra protections during emergency lockdown incidents to Existing Day-care occupancies but New Day-care occupancies were deprived of the same extra protections. Protective measures should be provided

equally to all occupants. Locks used only for emergency lockdown purposes are consider to be an economical and affordable locking means, and should be equally available to New or Existing Day-care occupancies.

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<a href="#">Public Comment No. 112-NFPA 101-2025 [Section No. 7.2.1.5.3.8]</a>	
<a href="#">Public Comment No. 102-NFPA 101-2025 [New Section after 7.2.1.6.4.2]</a>	

Related Item

- Special Locking Arrangements

Submitter Information Verification

**Submitter Full Name:** Jack Taylor  
**Organization:** Nightlock  
**Affiliation:** Nightlock  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Tue Jun 03 00:32:24 EDT 2025  
**Committee:** SAF-END



## Public Comment No. 100-NFPA 101-2025 [ New Section after 16.3.4.3 ]

### 16.3.4.3.4

Occupant notification shall be required to be a voice communication or public address system in accordance with Section 9.6.3.10.2 when the occupant load of the new daycare facility is more than 50.

## Statement of Problem and Substantiation for Public Comment

The current NFPA 101: Life Safety Code (2024 edition) does not require an emergency voice/alarm communication system (EVACS) for new daycare occupancies. This fails to adequately address the vulnerabilities of daycare facilities with an occupant load of 50 or more, where the majority of occupants are young children who may lack the cognitive and physical abilities to respond effectively to standard fire or emergency alarms without clear, intelligible guidance. The absence of a mandatory EVACS in these facilities increases the risk of delayed or disorganized evacuations, potentially leading to injury or loss of life. Young children require explicit, calm, and authoritative instructions to navigate emergencies, which standard audible alarms cannot provide. Additionally, daycare staff, often managing multiple children, need automated, clear communication to facilitate orderly evacuations. This proposal seeks to amend NFPA 101 to mandate EVACS in all new daycare facilities with an occupant load of 50 or more to enhance life safety for this vulnerable population.

Mandating EVACS in daycare facilities with an occupant load of 50 or more is essential to ensure the safety of young children and staff during emergencies. The following points support this proposal:

**Vulnerable Population:** Daycare facilities primarily serve children under 5 years old, who are less capable of recognizing and responding to fire alarms compared to adults or older children. Research shows that young children may freeze or hide during emergencies due to fear or confusion, necessitating clear verbal instructions to prompt action. An EVACS delivers intelligible voice commands that can guide children and staff to safety, reducing panic and improving evacuation efficiency.

**Staff-to-Child Ratios:** Daycare facilities often operate with high staff-to-child ratios (e.g., 1:4 for infants or 1:10 for preschoolers). In facilities with 50 or more occupants, staff are responsible for evacuating numerous children, many of whom may require physical assistance. An EVACS can provide real-time instructions, allowing staff to focus on physically aiding children rather than managing chaos or shouting over alarms.

**Risks in Larger Daycare Settings:** Facilities with an occupant load of 50 or more face increased risks due to the potential for rapid smoke spread, limited egress points, and the challenges of evacuating a larger number of young children. A historical example, such as the 1988 Chicago daycare fire, which resulted in four child fatalities in a facility with fewer than 50 occupants, underscores the need for enhanced notification systems in larger settings to ensure timely and orderly evacuation.

**Precedent in Other Codes:** The Washington Fire Code, through its adoption of the 2021 International Fire Code (IFC) with state-specific amendments, mandates EVACS for Group I-4 occupancies (daycare facilities with more than five clients) with an occupant load of 50 or more. Section 907.2.6.4 of the Washington State Amendments requires an approved fire alarm system with an EVACS to deliver clear, audible instructions during emergencies. This requirement acknowledges the heightened risks in larger daycare settings and provides a model for NFPA 101 to adopt a similar mandate.

**Technological Feasibility and Cost-Effectiveness:** Modern EVACS technology is reliable, scalable, and cost-effective, even for facilities with moderate occupant loads. Systems can be integrated with existing fire alarm infrastructure, minimizing installation costs. The life safety benefits of preventing

even a single casualty in a daycare with 50 or more occupants far outweigh the financial burden, given the high societal value placed on protecting children.

Consistency with NFPA 101 Objectives: NFPA 101 aims to provide a reasonable degree of safety from fire and other emergencies across all occupancies. Allowing daycare facilities with 50 or more occupants to forgo EVACS undermines this objective by leaving a vulnerable population inadequately protected. Requiring EVACS in these facilities aligns with the code's intent to prioritize life safety, particularly for those least able to protect themselves.

Supporting Evidence from Washington Fire Code: The Washington Fire Code's requirement for EVACS in Group I-4 occupancies with an occupant load of 50 or more demonstrates the feasibility and necessity of this approach. Section 907.2.6.4 ensures that daycare facilities are equipped with systems to provide clear, audible instructions during emergencies, addressing the unique needs of young children. This precedent supports the adoption of a similar requirement in NFPA 101 to elevate safety standards nationwide.

Requiring EVACS in all new daycare facilities with an occupant load of 50 or more under NFPA 101 addresses a critical gap in life safety for young children and staff. The Washington Fire Code's mandate for Group I-4 occupancies provides a proven and feasible model. By implementing this requirement, NFPA 101 can ensure that larger daycare facilities are equipped to provide clear, effective communication during emergencies, significantly reducing the risk of harm to one of society's most vulnerable populations.

#### Related Item

- Washington State Fire Code, 2021 Edition - Section 907.2.6.4 Group I-4 occupancies
- Requiring the occupant notification to be an emergency voice/ alarm communication system for new daycare facilities that have an occupant load of more than 50.

### Submitter Information Verification

**Submitter Full Name:** Hunter Cullen

**Organization:** The Fire Alarm Source

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Sun Jun 01 19:01:10 EDT 2025

**Committee:** SAF-END



## Public Comment No. 15-NFPA 101-2025 [ Section No. 16.7.1.3 ]

### 16.7.1.3\*

Emergency action plans shall be reviewed and approved annually by the appropriate stakeholders.

### Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
101_A2026_SAF_AAC_CCN_24.pdf	101_CC NOTE24	

### Statement of Problem and Substantiation for Public Comment

NOTE: The following CC Note No. 24 Appeared in the First Draft Report on First Revisions No. 6717.

Consider replacing "the appropriate stakeholders" with enforceable language in 16.7.1.3.

#### Related Item

- FR 6717

### Submitter Information Verification

**Submitter Full Name:** CC Notes

**Organization:** Notes

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Thu Mar 06 10:29:56 EST 2025

**Committee:** SAF-END



## Correlating Committee Note No. 24-NFPA 101-2025 [ Section No. 16.7.1 ]

### Submitter Information Verification

**Committee:** SAF-AAC

**Submittal Date:** Fri Jan 24 10:14:31 EST 2025

### Committee Statement and Meeting Notes

**Committee Statement:** Consider replacing "the appropriate stakeholders" with enforceable language in 16.7.1.3.

First Revision No. 6717-NFPA 101-2024 [Section No. 16.7.1]

### Ballot Results

✓ **This item has passed ballot**

10 Eligible Voters

0 Not Returned

10 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

#### **Affirmative All**

Bush, Kenneth E.

Carson, Wayne G. Chip

Harbuck, Stanley C.

Hopper, Howard

Hugo, Jeffrey M.

Lucas, Jeffrey A.

Reiswig, Rodger

Rosenbaum, Eric R.

Savage, Sr., Michael L.

Tubbs, Jeffrey S.



## Public Comment No. 120-NFPA 101-2025 [ New Section after 17.2.2.2.3.3 ]

### Locks used only for Emergency Lockdown purposes

Locks used only for Emergency Lockdown purposes in accordance with (proposed [ New Section after 7.2.1.6.4.2 ] shall be permitted,

### Statement of Problem and Substantiation for Public Comment

Special locking arrangements provided in (proposed [ New Section after 7.2.1.6.4.2 ] provides extra protections for Day-care occupancies during emergency lockdown situations such as active shooter incidents. Corrects deficiencies associated with Releasing mechanism height requirements and disparities associated with Two movement egress.

### Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 102-NFPA 101-2025 [New Section after 7.2.1.6.4.2]	

#### Related Item

- Special Locking Arrangements

### Submitter Information Verification

**Submitter Full Name:** Jack Taylor

**Organization:** Nightlock

**Affiliation:** Nightlock

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Tue Jun 03 01:31:00 EDT 2025

**Committee:** SAF-END



## Public Comment No. 119-NFPA 101-2025 [ Section No. 17.2.2.6.1 ]

### 17.2.2.6.1

Classroom doors and doors to other client care spaces shall be permitted to be locked to prevent unwanted entry provided that the locking means is approved and all of the following conditions are met:

- (1) The locking means shall be capable of being engaged from the egress side of the door without opening the door.
- (2) The unlocking and unlatching from the egress side of the door shall be accomplished without the use of a key, a tool, or special knowledge or effort.
- (3)\* Two releasing motions shall be permitted where approved by the authority having jurisdiction provided that releasing does not require simultaneous operations and provided the door is not equipped with panic hardware or fire exit hardware.
- (4) The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor, unless otherwise permitted by (proposed [ New Section after 7.2.1.6.4.2 ] ).
- (5) Locks, if remotely engaged, shall be unlockable from the egress side of the door without the use of a key, a tool, or special knowledge or effort.
- (6) The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.
- (7) The locking means shall not impair the operation or affect the listing of the door closer, lockset, panic hardware, or fire exit hardware.
- (8) Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.
- (9) The emergency action plan, required by 17.7.1, shall address the use of the locking and unlocking means from both sides of the door.
- (10) Staff shall be drilled in the engagement and release of the locking means, from both sides of the door, as part of the emergency egress drills required by 17.7.2.
- (11) Locks used only for emergency lockdown purposes, and not used for normal operations, are permitted at any height in compliance with (proposed [ New Section after 7.2.1.6.4.2 ] ) , provided that all of the following are met: (A) The locking means shall only be used in an emergency lockdown situation and during lockdown drills. (B) The locking means shall be removable and not permanently mounted to the door, although individual parts of the locking means assembly, including but not limited to bolts, stops, brackets, and pins that do not prevent normal function of the door, may be permanently mounted. (C) The locking means shall only be used for a finite period of time.

### Statement of Problem and Substantiation for Public Comment

Locks used only for Emergency Lockdown purposes, and not used for normal operation, should not be subject to releasing mechanism height requirements of 34" inches to 48" inches above the finished floor. This height requirement presents a safety hazard during emergency lockdown events where occupants are sheltering in place. An assailant may easily reach through a broken window to unlock and breach the locked door. This locking means is portable and not permanently attached to the door. It is a non-fixed element and only deployed during active shooter intruder lockdown situations and lockdown drills , and it should be permitted at any height. Low to the floor and out of reach but still



releasable from outside the room with a key or other credential. Locks mounted at 34" to 48" have been compromised during active shooter incidents. The locking means release mechanism being removable at all times is never locked on the egress side of the door. And requires no special knowledge or effort to release.

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<a href="#">Public Comment No. 102-NFPA 101-2025 [New Section after 7.2.1.6.4.2]</a>	
<a href="#">Public Comment No. 111-NFPA 101-2025 [Section No. 7.2.1.5.3.1]</a>	
<a href="#">Public Comment No. 121-NFPA 101-2025 [Section No. 17.2.2.2.6.2]</a>	

Related Item

- Special locking arrangements

Submitter Information Verification

**Submitter Full Name:** Jack Taylor  
**Organization:** Nightlock  
**Affiliation:** Nightlock  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Tue Jun 03 01:23:19 EDT 2025  
**Committee:** SAF-END



## Public Comment No. 121-NFPA 101-2025 [ Section No. 17.2.2.2.6.2 ]

### 17.2.2.2.6.2 –

~~Where existing classroom doors and doors to client care spaces are replaced, they shall comply with the provisions of 16.2.2.2.6 .~~

## Statement of Problem and Substantiation for Public Comment

This section will not be needed if 17.2.2.2.6.1. proposed modifications are accepted.

## Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<u>Public Comment No. 119-NFPA 101-2025 [Section No. 17.2.2.2.6.1]</u>	

### Related Item

- Special Locking Arrangements

## Submitter Information Verification

**Submitter Full Name:** Jack Taylor

**Organization:** Nightlock

**Affiliation:** Nightlock

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Tue Jun 03 01:42:14 EDT 2025

**Committee:** SAF-END



## Public Comment No. 16-NFPA 101-2025 [ Section No. 17.7.1.3 ]

### 17.7.1.3\*

Emergency action plans shall be reviewed and approved annually by the appropriate stakeholders.

### Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
101_A2026_SAF_AAC_CCN_25.pdf	101_CC NOTE25	

### Statement of Problem and Substantiation for Public Comment

NOTE: The following CC Note No. 25 Appeared in the First Draft Report on First Revisions No. 6718.

Consider replacing "the appropriate stakeholders" with enforceable language in 17.7.1.3.

#### Related Item

- FR 6718

### Submitter Information Verification

**Submitter Full Name:** CC Notes

**Organization:** Notes

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Thu Mar 06 10:32:21 EST 2025

**Committee:** SAF-END



## Correlating Committee Note No. 25-NFPA 101-2025 [ Section No. 17.7.1 ]

### Submitter Information Verification

**Committee:** SAF-AAC

**Submittal Date:** Fri Jan 24 10:15:44 EST 2025

### Committee Statement and Meeting Notes

**Committee Statement:** Consider replacing "the appropriate stakeholders" with enforceable language in 17.7.1.3.

First Revision No. 6718-NFPA 101-2024 [Section No. 17.7.1]

### Ballot Results

✓ **This item has passed ballot**

10 Eligible Voters

0 Not Returned

10 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

#### **Affirmative All**

Bush, Kenneth E.

Carson, Wayne G. Chip

Harbuck, Stanley C.

Hopper, Howard

Hugo, Jeffrey M.

Lucas, Jeffrey A.

Reiswig, Rodger

Rosenbaum, Eric R.

Savage, Sr., Michael L.

Tubbs, Jeffrey S.



## Committee Input No. 6595-NFPA 101-2024 [ New Section after 14.3 ]

### 14.3.8

Educational occupancies shall be provided with an In-Building Emergency Responder Communications Enhancement System in accordance with section 9.15 where required by the authority having jurisdiction.

## Submitter Information Verification

**Committee:** SAF-END

**Submittal Date:** Wed Jul 17 09:52:18 EDT 2024

## Committee Statement

**Committee Statement:** This proposal codifies one of the important best practices frequently identified in the November 2021 Life Safety and Security Challenges in the K-12 Space Workshop sponsored by the Fire Protection Research Foundation. Based on the complexity of this proposal, it was decided to create a new Emergency Responder Communications Enhancement System (ERCES) task group and submit a public comment for Second Draft. The committee seeks to ensure that ERCES are only installed when needed, so that the requirements in this Code comply with FCC regulations.

**Response Message:** CI-6595-NFPA 101-2024

[Public Input No. 345-NFPA 101-2024 \[New Section after 14.3\]](#)

## Ballot Results

This item has not been balloted



## Committee Input No. 6633-NFPA 101-2024 [ New Section after 14.4.5 ]

### 14.4.6 Modular Rooms and Sleep Pods.

Where temporary or permanent modular rooms or sleep pods are used, they shall comply with 10.7.

## Submitter Information Verification

**Committee:** SAF-END

**Submittal Date:** Wed Jul 17 18:32:14 EDT 2024

## Committee Statement

**Committee Statement:** The committee recognizes that this new building feature could be used in educational occupancies and should be addressed in this chapter.

**Response Message:** CI-6633-NFPA 101-2024

## Ballot Results

This item has not been balloted



## Committee Input No. 6597-NFPA 101-2024 [ New Section after 15.3 ]

15.3.8. Existing educational occupancies shall be provided with an In-Building Emergency Responder Communications Enhancement System in accordance with section 9.15 where required by the authority having jurisdiction and 15.3.8.1.

15.3.8.1. New Emergency Responder communications enhancement systems shall be installed where any of the following occur:

- 1) There has been an incident in the facility that was negatively affected by the lack of radio coverage.
- 2) There is a known deficiency of the emergency radio coverage in the building that will significantly impact the emergency response to the facility based upon the risk assessment and/or emergency action plans required by this chapter and 4.8.
- 3) The educational facility has a school resource officer that has identified the lack of emergency radio coverage to hinder their safety or their ability to fulfill their duties and responsibilities within the building.

### Submitter Information Verification

**Committee:** SAF-END

**Submittal Date:** Wed Jul 17 10:04:42 EDT 2024

### Committee Statement

**Committee Statement:** This proposal codifies one of the important best practices frequently identified in the November 2021 Life Safety and Security Challenges in the K-12 Space Workshop sponsored by the Fire Protection Research Foundation. Based on the complexity of this proposal, it was decided to create a new Emergency Responder Communications Enhancement System (ERCES) task group and submit a public comment for Second Draft. The committee seeks to ensure that ERCES are only installed when needed, so that the requirements in this Code comply with FCC regulations.

**Response Message:** CI-6597-NFPA 101-2024

[Public Input No. 344-NFPA 101-2024 \[New Section after 15.3\]](#)

### Ballot Results

This item has not been balloted



## Committee Input No. 6710-NFPA 101-2024 [ New Section after 15.4.5 ]

### 15.4.6 Modular Rooms and Sleep Pods.

Where temporary or permanent modular rooms or sleep pods are used, they shall comply with 10.7.

## Submitter Information Verification

**Committee:** SAF-END

**Submittal Date:** Tue Jul 23 14:47:20 EDT 2024

## Committee Statement

**Committee Statement:** The committee recognizes that this new building feature could be used in educational occupancies and should be addressed in this chapter.

**Response Message:** CI-6710-NFPA 101-2024

## Ballot Results

This item has not been balloted





## Committee Input No. 6711-NFPA 101-2024 [ New Section after 16.4.5 ]

### 16.4.6 Modular Rooms and Sleep Pods.

Where temporary or permanent modular rooms or sleep pods are used, they shall comply with 10.7.

## Submitter Information Verification

**Committee:** SAF-END

**Submittal Date:** Tue Jul 23 14:49:02 EDT 2024

## Committee Statement

**Committee Statement:** The committee recognizes that this new building feature could be used in day-care occupancies and should be addressed in this chapter.

**Response Message:** CI-6711-NFPA 101-2024

## Ballot Results

 This item has not been balloted



## Committee Input No. 6712-NFPA 101-2024 [ New Section after 17.4.5 ]

### 17.4.6 Modular Rooms and Sleep Pods.

Where temporary or permanent modular rooms or sleep pods are used, they shall comply with 10.7.

## Submitter Information Verification

**Committee:** SAF-END

**Submittal Date:** Tue Jul 23 14:50:29 EDT 2024

## Committee Statement

**Committee Statement:** The committee recognizes that this new building feature could be used in day-care occupancies and should be addressed in this chapter.

**Response Message:** CI-6712-NFPA 101-2024

## Ballot Results

 This item has not been balloted

**INFORMATIONAL PC FOR TC REVIEW****Public Comment No. 101-NFPA 101-2025 [ Global Input ]**

See attached letter.

**Additional Proposed Changes**

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
73721_NFPA_ltr_out.pdf		✓

**Statement of Problem and Substantiation for Public Comment**

NTSB investigations have repeatedly shown that building occupants need alarms to encourage them to evacuate a building in the case of a gas leak.

**Related Item**

.

**Submitter Information Verification**

**Submitter Full Name:** Brandi Baldwin

**Organization:** NTSB

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Mon Jun 02 10:14:55 EDT 2025

**Committee:** SAF-BSF

**Copyright Assignment**

I, Brandi Baldwin, hereby irrevocably grant and assign to the National Fire Protection Association (NFPA) all and full rights in copyright in this Public Comment (including both the Proposed Change and the Statement of Problem and Substantiation). I understand and intend that I acquire no rights, including rights as a joint author, in any publication of the NFPA in which this Public Comment in this or another similar or derivative form is used. I hereby warrant that I am the author of this Public Comment and that I have full power and authority to enter into this copyright assignment.

☒ By checking this box I affirm that I am Brandi Baldwin, and I agree to be legally bound by the above Copyright Assignment and the terms and conditions contained therein. I understand and intend that, by checking this box, I am creating an electronic signature that will, upon my submission of this form, have the same legal force and effect as a handwritten signature

# National Transportation Safety Board

Office of the Chairman

Washington, DC 20594



April 8, 2025

Mr. Jim Pauley  
President and Chief Executive Officer  
National Fire Protection Association  
1 Batterymarch Park  
Quincy, MA 02169

Dear Mr. Pauley:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

We are providing the following information to urge the National Fire Protection Association to act on the safety recommendations in this letter because we believe your organization can help reduce the risk of future accidents. For more information about the NTSB and our recommendation process, please see the attached one-page summary.

This letter also includes information about our March 18, 2025, report, *UGI Corporation Natural Gas-Fueled Explosion and Fire, West Reading, Pennsylvania, March 24, 2023*, NTSB/PIR-25/01. The details of this accident investigation and the resulting safety recommendations may be found in the attached report, which can also be accessed at <http://www.nts.gov>.

As a result of this investigation, we identified the following safety issues:

- Degradation of a retired Aldyl A service tee that was accelerated by elevated ground temperatures from a corroded and cracked steam pipe nearby.
- UGI Corporation's insufficient consideration of pipeline integrity threats, particularly Aldyl A service tees with Delrin inserts at elevated temperatures.

- Presence of unmarked and unreported private assets crossing public rights-of-way, excluding them from the Pennsylvania One Call System and increasing the risk of damage to them.
- Delayed evacuation of Palmer's Building 2 despite detection of natural gas by employees and others.
- Natural gas safety messaging from pipeline operator public awareness programs that may not reach certain members of the public.
- Insufficient guidance on natural gas emergency procedures.
- Absence of natural gas alarms in commercial buildings.
- Insufficient accessibility of gas distribution line valves.

Accordingly, the NTSB makes the following safety recommendations to the National Fire Protection Association (additional information regarding these recommendations can be found in the noted sections of the report):

- Revise National Fire Protection Association 54 (the National Fuel Gas Code) to provide for required installation of natural gas alarms that meet the specifications of National Fire Protection Association 715 for buildings that use natural gas. (P-25-15) (See section 2.5.1.)
- Revise the appropriate nationally adopted building or fire codes to provide for natural gas emergency procedures. (P-25-16) (See section 2.5.2.)

The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days of the date of this letter, detailing the actions you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendations by number (Safety Recommendations P-25-15 and -16). We encourage you to submit your response to [ExecutiveSecretariat@ntsb.gov](mailto:ExecutiveSecretariat@ntsb.gov). If your reply, including attachments, exceeds 20 megabytes, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

All communications regarding safety recommendations are stored by the NTSB and viewable by the public. Please do not send privileged or confidential communications in response to these recommendations. Responses marked as confidential or privileged (or similar designations) will be considered nonresponsive. In the likely event that your organization uses auto-generated and/or preformatted confidentiality statements on letterhead or outgoing e-mails, please include a statement in your letter indicating that the information can be publicly released. If you have concerns about this protocol, please contact us at [ExecutiveSecretariat@ntsb.gov](mailto:ExecutiveSecretariat@ntsb.gov).

Sincerely,



Jennifer L. Homendy  
Chairman  
On behalf of the entire Board

cc: Seth Statler  
Director, Government Affairs, National Fire Protection Association



## Committee Input No. 8120-NFPA 5000-2024 [ New Section after 17.3 ]

17.3.9 Educational occupancies shall be provided with an In-Building Emergency Responder Communications Enhancement System in accordance with section 55.15 where required by the authority having jurisdiction.

17.3.9.1 Existing educational occupancies shall be provided with an In-Building Emergency Responder Communications Enhancement System in accordance with section 55.15 where required by the authority having jurisdiction and 17.3.9.2.

17.3.9.2. New Emergency Responder communications enhancement systems shall be installed where any of the following occur:

- 1) There has been an incident in the facility that was negatively affected by the lack of radio coverage.
- 2) There is a known deficiency of the emergency radio coverage in the building that will significantly impact the emergency response to the facility based upon the risk assessment and/or emergency action plans required by this chapter and 4.8.
- 3) The educational facility has a school resource officer that has identified the lack of emergency radio coverage to hinder their safety or their ability to fulfill their duties and responsibilities within the building.

### Submitter Information Verification

**Committee:** BLD-END

**Submittal Date:** Wed Jul 17 10:03:33 EDT 2024

### Committee Statement

**Committee Statement:** This proposal codifies one of the important best practices frequently identified in the November 2021 Life Safety and Security Challenges in the K-12 Space Workshop sponsored by the Fire Protection Research Foundation. Based on the complexity of this proposal, it was decided to create a new Emergency Responder Communications Enhancement System (ERCES) task group and submit a public comment for Second Draft. The committee seeks to ensure that ERCES are only installed when needed, so that the requirements in this Code comply with FCC regulations.

**Response Message:** CI-8120-NFPA 5000-2024

[Public Input No. 154-NFPA 5000-2024 \[New Section after 17.3\]](#)

### Ballot Results

This item has not been balloted



## Committee Input No. 8185-NFPA 5000-2024 [ New Section after 17.4.5 ]

### 17.4.6 Modular Rooms and Sleep Pods.

Where temporary or permanent modular rooms or sleep pods are used, they shall comply with 10.4.

## Submitter Information Verification

**Committee:** BLD-END

**Submission Date:** Tue Jul 23 14:51:38 EDT 2024

## Committee Statement

**Committee Statement:** The committee recognizes that this new building feature could be used in educational occupancies and should be addressed in this chapter.

**Response Message:** CI-8185-NFPA 5000-2024

## Ballot Results

This item has not been balloted





## Committee Input No. 8186-NFPA 5000-2024 [ New Section after 18.4.5 ]

### 18.4.6 Modular Rooms and Sleep Pods.

Where temporary or permanent modular rooms or sleep pods are used, they shall comply with 10.4.

## Submitter Information Verification

**Committee:** BLD-END

**Submittal Date:** Tue Jul 23 14:53:33 EDT 2024

## Committee Statement

**Committee Statement:** The committee recognizes that this new building feature could be used in day-care occupancies and should be addressed in this chapter.

**Response Message:** CI-8186-NFPA 5000-2024

## Ballot Results

 This item has not been balloted

**INFORMATIONAL PC FOR TC REVIEW****Public Comment No. 56-NFPA 5000-2025 [ Global Input ]**

See attached letter.

**Additional Proposed Changes**

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
73721_NFPA_ltr_out.pdf		✓

**Statement of Problem and Substantiation for Public Comment**

We are providing the attached information to urge the National Fire Protection Association to act on the safety recommendations in this letter because we believe your organization can help reduce the risk of future accidents.

**Related Item**

- First Revision No. 8034

**Submitter Information Verification****Submitter Full Name:** Brandi Baldwin**Organization:** NTSB**Street Address:****City:****State:****Zip:****Submittal Date:** Mon Jun 02 10:20:54 EDT 2025**Committee:** BLD-BSF**Copyright Assignment**

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# National Transportation Safety Board

Office of the Chairman

Washington, DC 20594



April 8, 2025

Mr. Jim Pauley  
President and Chief Executive Officer  
National Fire Protection Association  
1 Batterymarch Park  
Quincy, MA 02169

Dear Mr. Pauley:

The National Transportation Safety Board (NTSB) is an independent federal agency charged by Congress with investigating every civil aviation accident in the United States and significant accidents in other modes of transportation—railroad, highway, marine, and pipeline. We determine the probable cause of the accidents and issue safety recommendations aimed at preventing future accidents. In addition, we carry out special studies concerning transportation safety and coordinate the resources of the federal government and other organizations to assist victims and their family members affected by major transportation disasters.

We are providing the following information to urge the National Fire Protection Association to act on the safety recommendations in this letter because we believe your organization can help reduce the risk of future accidents. For more information about the NTSB and our recommendation process, please see the attached one-page summary.

This letter also includes information about our March 18, 2025, report, *UGI Corporation Natural Gas-Fueled Explosion and Fire, West Reading, Pennsylvania, March 24, 2023*, NTSB/PIR-25/01. The details of this accident investigation and the resulting safety recommendations may be found in the attached report, which can also be accessed at <http://www.nts.gov>.

As a result of this investigation, we identified the following safety issues:

- Degradation of a retired Aldyl A service tee that was accelerated by elevated ground temperatures from a corroded and cracked steam pipe nearby.
- UGI Corporation's insufficient consideration of pipeline integrity threats, particularly Aldyl A service tees with Delrin inserts at elevated temperatures.

- Presence of unmarked and unreported private assets crossing public rights-of-way, excluding them from the Pennsylvania One Call System and increasing the risk of damage to them.
- Delayed evacuation of Palmer's Building 2 despite detection of natural gas by employees and others.
- Natural gas safety messaging from pipeline operator public awareness programs that may not reach certain members of the public.
- Insufficient guidance on natural gas emergency procedures.
- Absence of natural gas alarms in commercial buildings.
- Insufficient accessibility of gas distribution line valves.

Accordingly, the NTSB makes the following safety recommendations to the National Fire Protection Association (additional information regarding these recommendations can be found in the noted sections of the report):

- Revise National Fire Protection Association 54 (the National Fuel Gas Code) to provide for required installation of natural gas alarms that meet the specifications of National Fire Protection Association 715 for buildings that use natural gas. (P-25-15) (See section 2.5.1.)
- Revise the appropriate nationally adopted building or fire codes to provide for natural gas emergency procedures. (P-25-16) (See section 2.5.2.)

The NTSB is vitally interested in these recommendations because they are designed to prevent accidents and save lives. We would appreciate a response within 90 days of the date of this letter, detailing the actions you have taken or intend to take to implement these recommendations. When replying, please refer to the safety recommendations by number (Safety Recommendations P-25-15 and -16). We encourage you to submit your response to [ExecutiveSecretariat@ntsb.gov](mailto:ExecutiveSecretariat@ntsb.gov). If your reply, including attachments, exceeds 20 megabytes, please e-mail us at the same address for instructions on how to send larger documents. Please do not submit both an electronic copy and a hard copy of the same response.

All communications regarding safety recommendations are stored by the NTSB and viewable by the public. Please do not send privileged or confidential communications in response to these recommendations. Responses marked as confidential or privileged (or similar designations) will be considered nonresponsive. In the likely event that your organization uses auto-generated and/or preformatted confidentiality statements on letterhead or outgoing e-mails, please include a statement in your letter indicating that the information can be publicly released. If you have concerns about this protocol, please contact us at [ExecutiveSecretariat@ntsb.gov](mailto:ExecutiveSecretariat@ntsb.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer L. Homendy", with a long, sweeping flourish extending to the right.

Jennifer L. Homendy  
Chairman  
On behalf of the entire Board

cc: Seth Statler  
Director, Government Affairs, National Fire Protection Association