AGENDA

Technical Committee on Fire Doors and Windows (FDW-AAA)
NFPA 80 and 105 First Draft Meeting (A2024)

October 4 – 6, 2022
8:00 a.m. – 5:00 p.m. (ET)

NFPA Headquarters, Quincy, MA and Microsoft Teams Web Conference To join the meeting, please contact ksmith@nfpa.org

1. **Call to order.** Keith Pardoe.
2. **Introductions.** See committee roster attached.
3. **Chair report.** Keith Pardoe.
4. **Staff liaison report.** Jennifer Sisco.
5. **Previous meeting minutes.** April 27, 2022 Microsoft Teams Web Meeting/Teleconference.
6. **NFPA 105 First Draft.**
   a. **Public Inputs.**
   b. **Task group reports.**
      i. **Damper Inspection**. S. Orlowski.
      ii. **Damper Terminology**. J. Glaski.
      iii. **Damper ITM.** M. Savage.
   c. **Presentations.**
7. **NFPA 80 First Draft.**
   a. **Public Inputs.**
   b. **Task group reports.**
      i. **Field Labeling**. J. Peterkin.
      ii. **Damper Inspection**. S. Orlowski.
      iii. **Chapter 4 Reorganization.** J. Rice.
      iv. **Editorial Revisions.** W. Connor.
      v. **Damper Terminology.** J. Glaski.
      vi. **Damper ITM.** M. Savage.
      vii. **Horizontal Opening Protectives.** R. Sontag.
      viii. **Chapter 5 Nomenclature.** C. Roth.

ix. **Fire Protection Research Foundation Door Gap Report.** H. Hicks.

x. **Door Signage.** M. Savage.

c. **Presentations.**

8. Other Business.

9. Future meetings.

10. Adjournment.

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MINUTES

NFPA Technical Committee on Fire Doors and Windows (FDW-AAA)
NFPA 80 and 105 Pre-First Draft Meeting (A2024)

Wednesday, April 27, 2022
10 a.m. – 4 p.m. (ET)

Web/Teleconference

1. **Call to order.** Keith Pardoe, chair, called the meeting to order at 10:00 a.m. (ET) on April 27, 2022 via Microsoft Teams.
2. **Introductions.** Attendees introduced themselves and identified their affiliation.
3. **Chair report.** Keith Pardoe welcomed attendees and provided an overview of the meeting.
4. **Staff liaison report.** Jennifer Sisco provided an overview of the standards development process and the revision cycle schedule.
5. **Previous meeting minutes.** The minutes from the NFPA 80 and 105 Second Draft, web/teleconference, October 6-8, 2020 were approved without revision.
6. **Task Groups.** Task group chairs gave a task group report of the status of each task group. All task group members were dismissed with thanks and the chair reformed each task group with new members. Special thanks was given to Marty Gissel and Jerry Rice, the previous task group chairs.
   a. **Damper remote inspection [80/105].** TG Chair: Steve Orlowski. Members: Keith Lippincott, Robert Sontag, James Richardson, Joanna Blaney, Mark Smith, Dion Abril, William Koffel, Kent Maune, Marty Gissel, Aaron Gunzner, John Hamilton, Jim Peterkin, Dennis Dawe, David Feist, and Michael Nicasio. The scope of this task group is to review the remote inspection requirements in NFPA 80 & 105 and, if needed, to add requirements for visual inspection and review the exception for inspection for inaccessible dampers. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.
   b. **Chapter 4 reorganization [80].** TG Chair: Jerry Rice. Members: Craig Ordmandy, Mark Smith, Thomas Zaremba, Marilyn Latham, and Joshua Swann. The scope of this task group is to review the requirements in NFPA 80, Chapter 4 to determine if they are applicable to only certain types of opening protectives. Requirements specific to one or only a few types of opening protective should be relocated to the specific chapter, requirements applicable to multiples of opening protectives can remain in chapter 4, but ensure requirements are clear on types of opening protectives to which the requirements are or are not applicable. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.
   c. **Field labeling [80].** TG Chair: James Peterkin. Members: Christopher Roth, Michael Savage, Robert Sontag, James Richardson, Dion Abril, Rossen Marinov, Cesar Lujan,

William Koffel, Kurt Roeper, Tom Janicak, Marilyn Latham, Justin Hendricks, Michael Thorp, Jerry Rice, Craig Ordmandy, Mark Chrisman, Harold Hicks, Joseph Glaski, Steve Orlowski, David Feist, Michael Nicasio, Harold Kelton, and Chuck Noble. The scope of this task group is to review the NFPA 80 field labeling provisions, including the following:

(1) Scope, application, and exclusions - Provide recommendation if provisions are intended only for doors, certain types of doors, or all opening protectives under the scope of Chapter 5, also if these provisions apply to labeled components.
(2) Who - Provide recommendation on persons or entities who should be permitted to do field labeling.
(3) Qualifications - Provide recommendation if the current provisions adequately address qualifications for persons doing field labeling.
(4) Exceptions - Provide recommendation for any exceptions to doors required to be field labeled.

Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.

d. **Editorial revisions [80].** TG Chair: William Conner. Members: Joanna Blaney and Marilyn Latham. The scope of this task group is to review editorial comments prepared by NFPA staff for NFPA 80. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.

7. Other Business.

a. **FPRF Door Gap Study.** Sreeni Ranganathan provided a presentation on Phase II of the NFPA Fire Protection Research Foundation project on the Influence of Gap Sizes Around Swinging Doors with Builders Hardware on Fire and Smoke Development. A task group was formed.

b. **Damper terminology [80/105].** The committee discussed consistency of damper terminology in NFPA 80 and 105 with other NFPA documents. A task group was formed.

c. **Damper testing [80/105]**. The committee discussed the requirements for the operational test, acceptance testing, and periodic testing in NFPA 80 and 105. A task group was formed.

d. **Qualifications for persons conducting testing [80/105].** The committee discussed the consistency of requirements for qualifications for persons conducting testing throughout NFPA 80 and NFPA 105.

e. **Application for each chapter [80/105].** The committee discussed the consistency of application sections for each chapter.

f. **Consistency of nomenclature [80].** The committee discusses the consistency of nomenclature used in Chapter 5 of NFPA 80. A task group was formed.

g. **Fire resistance rating and fire protection rating requirements [80].** The committee discussed the differences between fire resistance rated doors and fire protection rated doors and the applicability of NFPA 80 to fire resistance rated doors.

h. **Builders hardware vs. fire door hardware [80].** The committee discussed the nomenclature used for the classification of fire doors.

i. **Special purpose swinging doors [80].** The committee discussed the applicability of NFPA 80 to special purpose swinging doors, such as SCIF doors.

j. **Signage on fire doors [80].** The committee discussed the signage requirements on fire doors in NFPA 80. A task group was formed.

k. **New Task group.** The following new task groups were appointed to work subsequent to the meeting:

   i. **Damper terminology [80/105].** TG Chair: Joseph Glaski. Members: Mark Smith, Dion Abril, William Koffel, Kent Maune, Marty Gissel, Alex Talwar, John Hamilton, Dennis Dawe, and Michael Nicasio. The scope of this task group is to review the damper definitions in NFPA 80 and review against definitions in NFPA 90A and the damper terminology throughout NFPA 80 and NFPA 105 for consistency with defined terms. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.

   ii. **Damper ITM [80/105].** TG Chair: Mike Savage. Members: Robert Sontag, Christopher Roth, Dion Abril, Marty Gissel, Alex Talwar, Kent Maune, William Koffel, John Hamilton, Mark Chrisman, Joseph Glaski, and James Peterkin. The scope of this task group is to review the requirements for Operational Test, Acceptance Testing, and Periodic Testing for dampers in NFPA 80 and NFPA 105. Determine if the requirements of these three sections can be consolidated. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.

   iii. **Chapter 5 Nomenclature [80].** TG Chair: Christopher Roth. Members: Marilyn Latham, Thomas Zaremba, William Conner, and David Feist. The scope of this task group is to review each requirement in this chapter to determine the applicability of it to each type opening protective under the scope of chapter 5: fire doors, fire shutters, and fire windows. Fire shutters, by definition, are a type of fire door, provide recommendation if fire shutters need to be specifically called out. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.

   iv. **Door Signage [80].** TG Chair: Michael Savage. Members: Robert Sontag, Christopher Roth, Justin Hendricks, James Peterkin, Harold Kelton, and Michael Nicasio. The scope of this task group is to review the requirements for signage on fire in NFPA 80. Review existing provisions to determine if changes are necessary, what constitutes signage (e.g. is a "door wrap" signage), and if these provisions are applicable to all types of doors. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.

   v. **Horizontal Opening Protectives [80].** TG Chair: Robert Sontag. Members: William Koffel, Thomas Zaremba, Mark Chrisman, Michael Nicasio, and Curtis Gonzales. The scope of this task group is to review the types of opening protectives and provide recommendation if new requirements or a new type opening protective should be included in NFPA 80. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.

   vi. **FRPF Door Gap [80].** TG Chair: Harold Hicks. Members: Michael Savage, Kurt Roeper, Tom Janicak, Michael Puls, Justin Hendricks, Steve Orlowski, and Michael Nicasio. The scope of this task group is to review the FPRF door gap report and provide

recommendation on whether any changes should be considered regarding clearances under doors at this time based on the findings in the report. Submit public inputs, as necessary, and provide a written task group report by September 5, 2022.

8. **Future meetings.** The First Draft Meeting will be October 4-6, 2022. The format and location of the meeting are to be determined. A meeting notice will be posted at www.nfpa.org/80 and www.nfpa.org/105 when the meeting is scheduled. Public inputs for the first draft meeting will close on June 1, 2022.
9. **Adjournment.** The meeting was adjourned at 3:55 p.m. (ET) on April 27, 2022.

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✓	Thomas Janicak	Alt. to K. Roeper	Ceco Door Products Rep. Steel Door Institute
✓	Craig Ordmandy	Alt. to J. Rice	Door Control Services, Inc.
	Timothy Orris	Alt. to A. Gunzer	AMCA International, Inc. Rep. Air Movement & Control Association
	William Skene	Alt. to J. Blaney	FM Global
	James Stapleton	Alt. to M. Latham	Habersham Metal Products Company Rep. National Assn. of Architectural Metal Manufacturers
	Garry Stewart	Alt. to D. Dawdy	The Doorman Service Company, Inc. Rep. International Door Association
✓	Alex Talwar	Alt. to M. Gissel	Greenheck
	David Tomecek	Alt. to B. Campbell	JENSEN HUGHES
	Rodney Weaver	Alt. to T. Rubright	ASSA ABLOY Academy Rep. Door and Hardware Institute
✓	Randy Young	Alt. to D. Abril	Sheet Metal Workers Local Union 104 Rep. Joint Committee on Energy and Environmental Policy (JCEEP)

✓	Thomas Zaremba	Alt. to W. Koffel	Roetzel and Andress Rep. Glazing Industry Code Committee
	Joseph Saino	Member Emeritus	
✓	Jen Sisco	Staff Liaison	National Fire Protection Association

Guests:

Nicole Casa	Door Services Corp
Harold Kelton	DOORDATA Solutions, Inc.
Paul Matera	Rep. ANSI National Accreditation Board (ANAB)
Colin McKay	Jensen Hughes
Nicholas Resetar	Roetzel and Andress
Tim Weller	Allegion
Curtis Gonzales	Idaho Star Services, LLC
Douglas Gazzale	The College of New Jersey
Cesar Lujan	Window & Door Manufacturers Association (WDMA)
Tom Goss	NFPA
Patrick Bakaj	NFPA
Sreeni Ranganathan	NFPA

Total number in attendance: 58

Public Input No. 1-NFPA 105-2022 [Section No. 2.3.1]

2.3.1 ASME Publications.

American Society of Mechanical Engineers, Two Park Avenue, New York, NY 10016-5990.

ASME A17.1/CSA B44, *Safety Code for Elevators and Escalators*, ~~2016~~ 2022 .

Statement of Problem and Substantiation for Public Input

Update to latest referenced standard

Submitter Information Verification

Submitter Full Name: Kevin Brinkman
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Submittal Date: Tue May 24 18:37:49 EDT 2022
Committee: FDW-AAA

Public Input No. 16-NFPA 105-2022 [Section No. 2.3.3]

2.3.3 UL Publications.

Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096.

UL 10B, *Fire Tests of Door Assemblies*, 2008, revised 2015.

UL 10C, *Positive Pressure Fire Tests of Door Assemblies*, 2016, revised 2021 .

UL 228, *Door Closers-Holders, With or Without Integral Smoke Detectors* , 2006, revised 2022.

UL 555, *Fire Dampers*, 2016, revised 2020 .

UL 555S, *Smoke Dampers*, 2016, revised 2020 .

UL 1784, *Air Leakage Tests of Door Assemblies*, 2015, revised 2020 .

Statement of Problem and Substantiation for Public Input

Update UL references to the latest editions. See PI for adding UL 228

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 17-NFPA 105-2022 [Section No. 6.3.6.5]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
Organization: UL LLC
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Submittal Date: Wed Jun 01 11:22:36 EDT 2022
Committee: FDW-AAA

Public Input No. 2-NFPA 105-2022 [Section No. 2.3.3]

2.3.3 UL Publications.

Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096.

UL 10B, *Fire Tests of Door Assemblies*, 2008, revised 2015.

UL 10C, *Positive Pressure Fire Tests of Door Assemblies*, 2016.

UL 555, *Fire Dampers*, 2016.

UL 555S, *Smoke Dampers*, 2016.

UL 1784, *Air Leakage Tests of Door Assemblies*, 2015.

UL 864, Standard for Control Units and Accessories for Fire Alarm Systems

Statement of Problem and Substantiation for Public Input

Most Chapter 9 products are listed to UL 864. Adding this reference provides more complete information for the standard user.

Submitter Information Verification

Submitter Full Name: Curtis Gonzales
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Submittal Date: Tue May 31 18:44:09 EDT 2022
Committee: FDW-AAA

Public Input No. 8-NFPA 105-2022 [Section No. 3.3.2]

3.3.2 Damper.

3.3.2.1 Combination Fire ~~and~~ - Smoke Damper.

A ~~device that~~ listed device installed in the ducts or air transfer openings of fire-resistance-rated walls, barriers, partitions, or floors that meets both the fire damper and smoke damper requirements. [**~~5000~~ 90A ,** ~~2021~~ 2024]

3.3.2.2 Corridor Damper.

A listed device intended for use where air ducts penetrate or ~~air transfer openings penetrate~~ terminate at horizontal openings in the ceilings of fire-resistance-rated corridors ~~, where~~ and where the corridor ceiling ~~is permitted to be constructed using an assembly tested as a wall.~~ is constructed as required for the corridor walls. [**90A** , 2024]

3.3.2.3 Smoke Damper.

A listed device within an air distribution system to control the movement of smoke. [**~~5000~~ 90A ,** ~~2021~~ 2024]

Statement of Problem and Substantiation for Public Input

During the 2024 Revision Cycle, both NFPA 101 and NFPA 5000 were revised to extract definitions for dampers from NFPA 90A. The Public Input is consistent with those revisions. It should be noted that the terms and definitions are consistent with the First Draft Report for NFPA 90A. If NFPA 90A were to make further revisions during the Public Comment Period, the same revisions should be made when taking an action on this Public Input.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 9-NFPA 105-2022 [Section No. 7.1]	
Public Input No. 10-NFPA 105-2022 [Section No. 7.3.2]	
Public Input No. 11-NFPA 105-2022 [Section No. 7.4.1]	
Public Input No. 12-NFPA 105-2022 [Section No. 7.5.2.1.2]	
Public Input No. 13-NFPA 105-2022 [Section No. A.1.2]	

Submitter Information Verification

Submitter Full Name: William Koffel
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Submittal Date: Wed Jun 01 10:46:13 EDT 2022
Committee: FDW-AAA

Public Input No. 17-NFPA 105-2022 [Section No. 6.3.6.5]

6.3.6.5 Door-Closing Devices.

Door-closing devices, other than spring hinges, shall meet the requirements of ANSI/BHMA A156.4, *Door Controls — Closers, Grade 1 or UL 228* .

6.3.6.5.1

Where non-fire-rated doors are permitted to be held open, the door closing device shall be permitted to have an integral friction hold-open feature that permits the door to be closed when pulled or pushed.

6.3.6.5.2

Doors arranged for automatic closing shall have a closing device that meets the requirements of 6.3.5.3.

Statement of Problem and Substantiation for Public Input

UL 228 is the test method for fire door closers, including the minimum required cycle count, closing force, and closing speed specifications. In addition, UL 228 is the test method used for the certification of listed and labeled fire door closers, allowing these products to be sold for use on fire rated doors.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 16-NFPA 105-2022 [Section No. 2.3.3]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
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Submittal Date: Wed Jun 01 11:25:28 EDT 2022
Committee: FDW-AAA

Public Input No. 9-NFPA 105-2022 [Section No. 7.1]

7.1* General.

This chapter covers the requirements of the installation, testing, and maintenance of smoke dampers, combination fire- ~~and~~ - smoke dampers, and corridor dampers.

7.1.1 Listings.

Dampers shall be listed in accordance with 7.1.1.1 and 7.1.1.2.

7.1.1.1

Smoke dampers shall be listed in accordance with UL 555S, *Smoke Dampers*.

7.1.1.2

Combination fire- ~~and~~ - smoke dampers and corridor dampers shall be listed in accordance with UL 555, *Fire Dampers*, and UL 555S, *Smoke Dampers*.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 8.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 8-NFPA 105-2022 [Section No. 3.3.2]	

Submitter Information Verification

Submitter Full Name: William Koffel
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Submittal Date: Wed Jun 01 10:54:11 EDT 2022
Committee: FDW-AAA

Public Input No. 10-NFPA 105-2022 [Section No. 7.3.2]

7.3.2

Dampers equipped with fusible links and/or internal operators shall be provided with an access door that is not less than 12 in.^{2} (7742 mm^2) or provided with a removable duct section.

7.3.2.1

Dampers that are installed behind registers, diffusers, or grilles shall be serviceable by removal of these covers.

7.3.2.2

A smoke damper access panel shall be labeled with the words “Smoke Damper” in letters not less than ½ in. (13 mm) in height. External insulation shall not conceal any access panel unless there is a label attached to the insulation clearly indicating the exact location of the access panel and the insulation is installed for ease of removal or ease of removal with the access panel.

7.3.2.3

Unobstructed access shall be provided through a ceiling or wall for inspection and service of the damper’s working parts.

7.3.2.4

Installation of combination fire- ~~and~~ - smoke dampers shall be in accordance with the installation of fire dampers in NFPA 80, Section 19.2.

7.3.2.5

Smoke detectors used to control smoke dampers or combination fire- ~~and~~ - smoke dampers shall be spaced and installed per the requirements of *NFPA 72*.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 8.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 8-NFPA 105-2022 [Section No. 3.3.2]	

Submitter Information Verification

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Committee: FDW-AAA

Public Input No. 11-NFPA 105-2022 [Section No. 7.4.1]

7.4.1 Smoke, Combination Fire- ~~and~~ - Smoke, and Corridor Dampers.

An operational test shall be conducted after the building's HVAC system has been balanced.

7.4.1.1

The test shall be adequate to determine that the damper has been installed and functions as intended.

7.4.1.2

The operational test shall be conducted under normal HVAC airflow and nonairflow conditions. The damper shall fully close under both test conditions.

7.4.1.3

The operational test shall verify that there are no obstructions to the operation of the damper.

7.4.1.4

The operational test shall verify that there is full and unobstructed access to the damper and all appurtenances.

7.4.1.5

All indicating devices shall be verified to work properly and report to the intended location.

7.4.1.6

Combination fire- ~~and~~ - smoke dampers and corridor dampers shall also meet the testing requirements contained in NFPA 80, Section 19.3.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 8.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 8-NFPA 105-2022 [Section No. 3.3.2]	

Submitter Information Verification

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Submittal Date: Wed Jun 01 10:58:04 EDT 2022
Committee: FDW-AAA

Public Input No. 12-NFPA 105-2022 [Section No. 7.5.2.1.2]

7.5.2.1.2

Combination fire ~~and~~ - smoke dampers and corridor dampers shall be inspected and tested in accordance with NFPA 80.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 8.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 8-NFPA 105-2022 [Section No. 3.3.2]	

Submitter Information Verification

Submitter Full Name: William Koffel
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Submittal Date: Wed Jun 01 10:59:37 EDT 2022
Committee: FDW-AAA

Public Input No. 14-NFPA 105-2022 [Section No. 7.5.2.2.3]

7.5.2.2.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required when documented as required in 7.5.4.2.1 and accepted by the AHJ for a single damper that is not accessible within a rated barrier or shaft.

Statement of Problem and Substantiation for Public Input

Determination by this NFPA TC of a “single” damper that can be omitted is problematic and should be left to the evaluation of the AHJ. It is unknown to this NFPA TC whether the “single” damper is one in a system of ten total dampers or one in a system with 100 total dampers. The AHJ, as defined in 3.2.2, “An organization, office, or individual responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, an installation, or a procedure.”

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 15-NFPA 105-2022 [Section No. A.7.5.2.2.3]	
Public Input No. 15-NFPA 105-2022 [Section No. A.7.5.2.2.3]	

Submitter Information Verification

Submitter Full Name: Duane Smith
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Submittal Date: Wed Jun 01 11:09:42 EDT 2022
Committee: FDW-AAA

Public Input No. 18-NFPA 105-2022 [Section No. 7.5.2.4.3]

7.5.2.4.3

All documentation shall be maintained for at least three test cycles and made available for review by the AHJ. At least one of the tests on record shall be a visual test as required in 7.5.2.3.2.

Statement of Problem and Substantiation for Public Input

The concern is with allowing the remote test method to be used indefinitely after the initial visual inspection. Mechanical devices, such as blade position switches can sometimes indicate that a damper is fully closed when it is not – there are instances where a wire/cable has been installed through the damper which does not allow for it to close fully but enough for the switch to indicate full closure. For this reason, a visual test should be required at regular intervals. A visual inspection can provide valuable information about the overall condition of the environment in which the damper operates, not just the position of the blades.

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Submittal Date: Wed Jun 01 16:45:17 EDT 2022
Committee: FDW-AAA

Public Input No. 4-NFPA 105-2022 [Section No. 8.3.2]

8.3.2*

Curtains shall be permitted to be sewn or joined by qualified persons in accordance with the manufacturer's instructions.

Statement of Problem and Substantiation for Public Input

Not all curtain materials are sewn. Some are technical films that are joined by other means.

Submitter Information Verification

Submitter Full Name: Curtis Gonzales
Organization: Idaho Star Services
Affiliation: Smoke Guard, Inc.
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Submittal Date: Tue May 31 18:54:06 EDT 2022
Committee: FDW-AAA

Public Input No. 3-NFPA 105-2022 [Section No. 8.4]

8.4 Power Operators.

Power operators shall be provided with a standby or an emergency power source to close the curtain upon activation or shall be capable of closing the curtain without power. Power operators shall be listed to UL 864.

Statement of Problem and Substantiation for Public Input

To my knowledge, all US market manufacturers list their controllers to UL 864. This is intended to clarify this requirement that was originally started with ICC-ES AC77.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 6-NFPA 105-2022 [Section No. 9.4]	

Submitter Information Verification

Submitter Full Name: Curtis Gonzales
Organization: Idaho Star Services
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Submittal Date: Tue May 31 18:50:23 EDT 2022
Committee: FDW-AAA

Public Input No. 5-NFPA 105-2022 [Section No. 8.7.3]

8.7.3

Any ~~breaks~~ holes, tears, or cuts in the ~~face covering of~~ curtains shall be repaired in accordance with the manufacturer's requirements without delay.

Statement of Problem and Substantiation for Public Input

As a manufacturer of smoke protective curtain assemblies, it is not clear what "breaks in the face covering of curtains" is intended to mean. This is a confusing reference. In practice, holes and tears do occur which require repair in accordance with the manufacturers' instructions by a qualified person.

Submitter Information Verification

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Submittal Date: Tue May 31 18:58:02 EDT 2022
Committee: FDW-AAA

Public Input No. 6-NFPA 105-2022 [Section No. 9.4]

9.4 Power Operators.

Power operators shall be provided with a standby or an emergency power source to close the curtain upon activation, or be capable of closing the curtain without power. Power operators shall be listed to UL 864.

Statement of Problem and Substantiation for Public Input

To my knowledge, all US market manufacturers list their controllers to UL 864. This is intended to clarify this requirement that was originally started with ICC-ES AC77.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 3-NFPA 105-2022 [Section No. 8.4]	same

Submitter Information Verification

Submitter Full Name: Curtis Gonzales
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Street Address:
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Submittal Date: Tue May 31 19:05:44 EDT 2022
Committee: FDW-AAA

Public Input No. 7-NFPA 105-2022 [Section No. 9.6.2.3]

9.6.2.3

The following items shall be verified:

(1) Labels are clearly visible and legible.

(2) No open holes exist in surfaces of the curtain or side retention system.

(3) The curtain covers the opening as intended and is aligned, level, plumb, and true.

(4) Mounting and assembly bolts are intact and secured.

(5) Attachments to building structure are with bolts, anchors, or as otherwise required by the listing and the manufacturer's instructions.

(6) Hoistway lobby smoke detectors, if equipped, are installed, operational, and in accordance with *NFPA 72*.

(7) No parts are missing or broken.

(8) Auxiliary hardware items that interfere or prohibit operation are not installed on the curtain or assembly.

(9) No field modifications to the smoke-protective curtain assembly have been performed that void the label.

(10) Smoke-protective curtain assemblies for hoistways have an average closing speed of not less than 6 in./sec (152 mm/sec) or more than 24 in./sec (610 mm/sec).

(11) The curtain assembly shall require not more than a 30-pound (133 N) force to be set in motion and shall move to the open position when subjected to not more than a 15-pound (67 N) force without power.

Statement of Problem and Substantiation for Public Input

In ICC-AC77 has been the controlling document for smoke curtains at the hoistway until introduced in Chapter 9. AC77 requires the curtain assembly to be opened with no more than 15 lbf. Additionally, the "Additional doors" in IBC 2021 section 3006.3 are required to be open with forces consistent with Section 1010.1.3. For completeness, it seems NFPA 105 Chapter 9 should also specify this opening force requirement.

Submitter Information Verification

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Submittal Date: Tue May 31 19:36:35 EDT 2022
Committee: FDW-AAA

Public Input No. 13-NFPA 105-2022 [Section No. A.1.2]

A.1.2

For the purposes of this standard, smoke can be considered to be airborne particulates and gases resulting from combustion. Therefore, to understand smoke movement it is only necessary to understand air movement. Hot smoke, however, will be buoyant and will be located above the neutral plane in the fire compartment. As it moves away from the fire source, it will cool, lose its buoyancy, and become less stratified. Beyond the immediate influence of the fire, smoke will behave just as warm or cool air would behave. It will be driven by pressure differentials within the building, or it will follow air currents created by the heating, ventilating, and air-conditioning (HVAC) system or smoke management system in the building. Pressure differentials can be the result of the following:

(1) Fire pressure buildup, which would drive only the smoke out of the compartment or area of origin

(2) Stack effect due to temperature differentials between the interior and exterior of the building

(3) Wind

(4) Pressures created mechanically using HVAC systems, exhaust fans, supply or pressurization fans, vents, and smoke management systems

This standard has its beginnings in measurements from test results reported in *Operation School Burning* and from NFPA Technical Paper No. 341, “Factors in Controlling Smoke in High Buildings,” where tenable or tolerable smoke concentration lists were established. Since the publication of *Operation School Burning* in 1959, considerable effort in the field of fire protection has been focused upon smoke movement in the built environment. NFPA *101* and NFPA 90A recognize that smoke control can be either active or passive. The passive approach recognizes the long-standing compartmentation concept, which requires that fans shut down and combination fire ~~and~~ - smoke dampers in ductwork close under fire conditions. The active approach utilizes the building's HVAC systems to create differential pressures to prevent smoke migration from the fire area and to exhaust the products of combustion to the outside. Active smoke control systems use passive barrier components that include smoke door assemblies to create zones or areas for effective smoke movement as an essential component.

Smoke management utilizing active and passive methods in combination to modify smoke movement must be engineered into a system and focused on protection of property or people. While passive methods of smoke management do exist *(see NFPA 204),* dynamic smoke control systems using mechanical equipment to meet design goals dominate. NFPA 92 is used for the design, installation, testing, operation, and maintenance of systems for smoke control and provides methodologies for determining smoke development in large spaces.

Smoke door assemblies are intended to maintain egress, allow for the rescue of the occupants, or allow occupants to remain in an area of refuge. The required duration of smoke protection can be equated with the path of egress. Evacuation typically starts in a room, progresses through a corridor, perhaps passes through a smoke barrier or horizontal exit, and proceeds through an entrance to the exit, which can be a stair enclosure, exit passageway, or the exit discharge. As with fire door assemblies, the longest time of protection is generally required at the entrance to an exit enclosure or horizontal exit, with shorter durations appropriate for preceding doors.

This path-of-egress arrangement is compatible with the protect-in-place concept as occupants are expected to be moved from one compartment to another for protection or, in some cases, protected in rooms other than the room of fire origin.

Occupancies not typical of this scenario include atria, malls, and open office plans. Areas of this sort can be adequately protected by reasonably tight-fitting doors without specific smoke door ratings because of the large volume of space involved.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 8.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 8-NFPA 105-2022 [Section No. 3.3.2]	

Submitter Information Verification

Submitter Full Name: William Koffel
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Submittal Date: Wed Jun 01 11:01:30 EDT 2022
Committee: FDW-AAA

Public Input No. 15-NFPA 105-2022 [Section No. A.7.5.2.2.3]

A.7.5.2.2.3

In existing buildings, it is recognized that some dampers might have become inaccessible for various reasons. Inaccessible dampers are those that have physical barriers or limitations where one cannot perform the required inspections or tests. ~~The inability to test a single damper might not pose a significant risk to the performance of the system where the system is fully ducted.~~

Statement of Problem and Substantiation for Public Input

The determination of risk to the performance of the system should be left to personnel with detailed information of a specific system. This NFPA TC does not have this information.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 14-NFPA 105-2022 [Section No. 7.5.2.2.3]	

Submitter Information Verification

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Submittal Date: Wed Jun 01 11:12:13 EDT 2022
Committee: FDW-AAA

Public Input No. 12-NFPA 80-2022 [Section No. 2.3.1]

2.3.1 ASME Publications.

American Society of Mechanical Engineers, Two Park Avenue, New York, NY 10016-5990.

ASME A17.1/CSA B44, *Safety Code for Elevators and Escalators*, ~~2016~~ 2022 .

Statement of Problem and Substantiation for Public Input

Update to latest edition of referenced standard

Submitter Information Verification

Submitter Full Name: Kevin Brinkman
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Submittal Date: Tue May 24 18:34:31 EDT 2022
Committee: FDW-AAA

Public Input No. 17-NFPA 80-2022 [Section No. 2.3.2]

2.3.2 ASTM Publications.

ASTM International, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, PA 19428-2959.

ASTM A36/A36M, *Standard Specification for Carbon Structural Steel*, 2019.

ASTM D4157, *Standard Test Method for Abrasion Resistance of Textile Fabrics (Oscillatory Cylinder Method)*, 2013, reapproved 2017.

ASTM D5034, *Standard Test Method for Breaking Strength and Elongation of Textile Fabrics (Grab Test)*, 2009, reapproved 2017.

ASTM D6193, *Standard Practice for Stitches and Seams*, 2016.

ASTM E119, *Standard Test Methods for Fire Tests of Building Construction and Materials*, 2020.

ASTM E136, *Standard Test Method for Assessing Combustibility of Materials Using a Vertical Tube Furnace at 750°C* , 2019a.

ASTM E648, *Standard Test Method for Critical Radiant Flux of Floor-Covering Systems Using a Radiant Heat Energy Source,* 2019ae1.

ASTM E2652, *Standard Test Method for Assessing Combustibility of Materials Using a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C* , 2018.

Statement of Problem and Substantiation for Public Input

ASTM E136 and ASTM E2652 added because of an associated PI

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 15-NFPA 80-2022 [New Section after 4.8.6]	

Submitter Information Verification

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Submittal Date: Sat May 28 15:57:37 EDT 2022
Committee: FDW-AAA

Public Input No. 34-NFPA 80-2022 [Section No. 2.3.6]

2.3.6 UL Publications.

Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096.

UL 9, *Fire Tests of Window Assemblies*, 2009, revised 2020.

UL 10A, *Tin-Clad Fire Doors*, 2009, revised 2018.

UL 10B, *Fire Tests of Door Assemblies,* 2008, revised 2020.

UL 10C, *Positive Pressure Fire Tests of Door Assemblies,* ~~2016~~ 2021 .

UL 10D, *Fire Tests of Fire-Protective Curtain Assemblies*, 2017.

UL 14C, *Swinging Hardware for Standard Tin-Clad Fire Doors Mounted Singly and in Pairs*, ~~2006, revised 2017~~ 2021 .

UL 33, *Heat Responsive Links for Fire-Protection Service*, ~~2010, revised 2020~~ 2021.

UL 228, *Door Closers-Holders, With or Without Integral Smoke Detectors* , 2006, revised 2022 .

UL 263, *Fire Tests of Building Construction and Materials*, 2011, revised ~~2020~~ 2022 .

UL 555, *Fire Dampers*, 2006, revised ~~2016~~ 2020 .

UL 555C, *Ceiling Dampers*, 2014, revised ~~2017~~ 2021 .

UL 555S, *Smoke Dampers*, 2014, revised ~~2016~~ 2021 .

UL 864, *Control Units and Accessories for Fire Alarm Systems*, 2014, revised 2020.

Statement of Problem and Substantiation for Public Input

Update UL references to the latest editions. See PI for adding UL 228.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 35-NFPA 80-2022 [Section No. 6.4.1]	
Public Input No. 42-NFPA 80-2022 [Section No. L.1.2.6]	

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Submittal Date: Wed Jun 01 10:55:05 EDT 2022
Committee: FDW-AAA

Public Input No. 27-NFPA 80-2022 [Section No. 3.3.27]

3.3.27 Combination Fire ~~and~~ - Smoke Damper.

See 3.3.37.2.

Statement of Problem and Substantiation for Public Input

Consistent with the action proposed in Public Input 26.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 26-NFPA 80-2022 [Section No. 3.3.37]	

Submitter Information Verification

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Submittal Date: Wed Jun 01 10:30:28 EDT 2022
Committee: FDW-AAA

Public Input No. 26-NFPA 80-2022 [Section No. 3.3.37]

3.3.37 Damper.

3.3.37.1 Ceiling Radiation Damper.

A listed device installed in a ceiling membrane of a fire-resistance-rated floor/ceiling or roof/ceiling assembly to automatically limit the radiative heat transfer through an air inlet/outlet opening. [**90A** , 2024]

3.3.37.2 Combination Fire- ~~and~~ - Smoke Damper.

A ~~device that~~ listed device installed in the ducts or air transfer openings of fire-resistance-rated walls, barriers, partitions, or floors that meets both the fire damper and smoke damper requirements. [~~**5000**~~ **90A** , ~~2021~~ 2024]

3.3.37.3 Corridor Damper.

A listed device intended for use where air ducts penetrate or ~~air transfer openings penetrate the~~ terminate at horizontal openings in the ceilings of fire-resistance-rated corridors ~~, where~~ and where the corridor ceiling ~~is permitted to be constructed using an assembly tested as a wall.~~ is constructed as required for the corridor walls. [**90A** , 2024]

3.3.37.4* Fire Damper.

A listed device, installed in an air-distribution system ~~, that is designed~~ and designed to close automatically upon detection of heat, to interrupt migratory airflow, and to restrict the passage of flame. [~~**5000**~~ **90A** ,- ~~2021~~ 2024]

3.3.37.5 Smoke Damper.

A listed device within an air-distribution system to control the movement of smoke. [~~5000~~ **90A** , ~~2021~~ 2024]

Statement of Problem and Substantiation for Public Input

Both NFPA 101 and NFPA 5000 have been modified to extract the definitions for dampers from NFPA 90A. The proposal is consistent with that action and the definitions in the First Draft Report of NFPA 90A. If the definitions or terms are revised in the Second Draft Report of NFPA 90A, the revisions should be included in the action on this Public Input.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 27-NFPA 80-2022 [Section No. 3.3.27]	
Public Input No. 28-NFPA 80-2022 [Section No. 19.1.1]	
Public Input No. 29-NFPA 80-2022 [Section No. 19.1.3]	
Public Input No. 30-NFPA 80-2022 [Section No. 19.1.4.3]	
Public Input No. 31-NFPA 80-2022 [Section No. 19.3.2]	
Public Input No. 32-NFPA 80-2022 [Section No. 19.6.6]	

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Committee:	FDW-AAA

Public Input No. 47-NFPA 80-2022 [New Section after 3.3.86.1]

Label service

Label service - review and testing services of products and procedures by an organization acceptable to the authority having jurisdiction

Additional Proposed Changes

File Name	Description	Approved
label_service.doc	additional substantiation for definition of label service	

Statement of Problem and Substantiation for Public Input

This term is used a lot and not defined. It is also not used consistently. I suggest these modifications in the attachment for consistency.

Submitter Information Verification

Submitter Full Name: William Conner
Organization: Bill Conner Associates LLC
Street Address:
City:
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Submittal Date: Wed Jun 01 15:17:42 EDT 2022
Committee: FDW-AAA

4.4.3.1 * For new wood doors, glazing materials in vision panels shall be installed in labeled glass light kits or in accordance with the fire door listing and shall be installed ~~in accordance with inspection service procedure and under label service~~ as specified by the manufacturer's label service procedure.

4.8.4.4 Where the bottom of the door is more than 38 in. (965 mm) above the finished floor, the maximum clearance shall not exceed 3/ 8 in. (9.5 mm) or as specified by the manufacturer's label service procedure.

5.1.4.1 Field labeling shall be performed only by individuals or companies that have been certified or listed, or by individuals or companies that are representatives of a labeling service that maintains periodic inspections of production of labeled equipment or materials and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

5.1.4.4 Field modifications shall not be permitted to be made to a non-fire-rated door assembly to achieve a fire rating unless the field modification is completed under label service as specified by the manufacturer's label service procedure .

5.1.5.2.1 Preparation of fire door assemblies for locks, latches, hinges, remotely operated or remotely monitored hardware, concealed closers, glass lights, vision panels, louvers, astragals, and split astragals and the application of plant-ons and laminated overlays shall be performed in accordance with the manufacturer’s inspection service procedure and under label service as specified by the manufacturer's label service procedure. (See Annex E and Annex F.)

6.4.3.1.8.3 Pivot sets made up of components that are smaller or of a lighter gauge than those shown in Table 6.4.3.1 shall be permitted to be used, provided they meet the requirements of ANSI/BHMA A156.4, Standard for Door Controls (Closers), and are ~~in accordance with~~ as specified by the manufacturer's label service procedures.

6.4.4.9 Strike plates shall be secured to the frame with steel screws or other types of screws as ~~indicated by the manufacturer's published listing or label service procedure~~ as specified by the manufacturer's label service procedure.

7.4.3.2 * Hinges and Latches, Number and Length. The number and length of both the hinges and the latches shall ~~be in accordance with the manufacturer's label service procedure and individual published listing~~ as specified by the manufacturer's label service procedure.

8.2.4.1.4 Other types of doors containing combustible core material shall be vented ~~as provided by the manufacturer's procedure under label service~~ as specified by the manufacturer's label service procedure.

8.4.3.2 Tracks. Tracks shall be inclined or ~~level, depending on the manufacturer's specific label service procedure~~ as specified by the manufacturer's label service procedure.

8.4.3.3.2 The bolt spacing shall be ~~determined by the manufacturer's specific test and label service procedure~~ as specified by the manufacturer's label service procedure .

8.4.3.5.2 Biparting sliding doors shall be provided with the sill binders or center guides ~~if required by the individual manufacturer's label service procedure~~ as specified by the manufacturer's label service procedure.

A.4.4.3.1 The 2010 edition of NFPA 80 was modified to require that new wood fire doors have the glazing and light kit installed at the door manufacturer or ~~under that manufacturer’s label service~~ as specified by the manufacturer's label service procedure . This ensures that all components of the glazed assembly in the new wood door have been properly installed per the manufacturer’s follow-up service procedure.

Public Input No. 16-NFPA 80-2022 [Section No. 3.3.93]

3.3.93 Noncombustible.

~~Not capable of igniting and burning when subjected to a fire.~~ (See 4.9)

Statement of Problem and Substantiation for Public Input

This is consistent with what is done in most NFPA codes and standards (including 1, 101, 5000, 90A, etc. Definitions should not contain requirements and most NFPA documents and codes and standards consider that passing ASTM E136 determines that a material is noncombustible.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 15-NFPA 80-2022 [New Section after 4.8.6]	

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler
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Submittal Date: Sat May 28 15:54:57 EDT 2022
Committee: FDW-AAA

Public Input No. 40-NFPA 80-2022 [New Section after 4.2]

4.3 Installation and Adjustments

4.3.1 All fire doors and opening protectives including materials, devices, components, and parts required for them shall be installed in accordance with the manufacturer's instructions and published listings.

4.3.2 All fire doors and opening protectives including materials, devices, components, and parts required for them shall be adjusted to function as described in the listin manufacturer's instructions and published listings.

Additional Proposed Changes

File Name	Description	Approved
manufacturers_instructions.doc	additional substantiation for added 4.3	

Statement of Problem and Substantiation for Public Input

The requirement to follow manufacturers' instructions is repetitive throughout the standard. Requiring it for some specific aspects suggests that where not noted, it isn't required. This simply consolidates it and emphasizes the manufacturers' instructions and published listings are a primary and necessary requirement.

If the above change is accepted, the modifications in the attachment are suggested.

Submitter Information Verification

Submitter Full Name: William Conner
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Submittal Date: Wed Jun 01 11:07:46 EDT 2022
Committee: FDW-AAA

4.4.3 * Glazing materials in vision panels shall be installed in labeled glass light kits or ~~in accordance with the fire door listing and shall be installed in accordance with the manufacturer's installation instructions~~ or as require in section 4.3.

~~4.7.1.2 Actuation devices and their components shall be installed in accordance with the manufacturers' instructions.~~

~~4.8.4.2.2 Where a threshold is installed under a fire door, the clearance shall be in accordance with the hardware manufacturer's installation instructions and listing.~~

5.1.1.3 Where inspection criteria for door assemblies are not listed in this chapter, door assemblies shall be inspected in accordance with all of the following:
(1)*The requirements of this standard that were in effect at the time of installation
(2) The manufacturers' published listings and installation instructions
(3)*The requirements of the respective door chapter, Chapter 4, and Chapter 5, as applicable, where the manufacturers' published listings and installation instructions are not available

5.2.3.8.2 Resetting of the automatic-closing device shall be done in accordance with the manufacturer's instructions.

5.2.4.4.2 Resetting of the release mechanism shall be done in accordance with the manufacturer's instructions.

~~5.3.3 The retrofit operator shall be installed in accordance with its installation instructions and listing.~~

5.5.7 When fastener holes are left in a door or frame due to changes or removal of hardware or plant-ons, the holes shall be repaired by the following methods:
(1) Install steel fasteners that completely fill the holes.
(2) Fill the screw or bolt holes with the same material as the door or frame.
(3) Fill holes with material listed for this use ~~and installed in accordance with the manufacturer's procedures~~.

6.3.1.3 * Door frames intended for drywall installation shall be of the flush butt–mounted or wrap-around type, and anchors shall be secured ~~in accordance with the manufacturer's instructions~~.

<u>6.3.1.4 * Proprietary-type slip-on door frames shall be installed in accordance with the manufacturer's installation instructions.</u>

6.3.1.7.5 * Door leaves constructed of other materials shall not have clearances greater than 1/ 8 in. (3.18 mm) between the top and vertical edges of doors and meeting stiles of paired doors, unless otherwise permitted in the door frame, door, and latching hardware manufacturers' published listings.

6.3.3.2 Multiple-section transom and side light frames (see G.?10.3) shall be field assembled ~~using the assembly methods that are in accordance with the manufacturer's installation instructions~~.

~~6.4.2 * Application of Door Holder/Release Devices. Door holder/release devices shall be installed in accordance with the manufacturer's instructions and only in conformance with the individual manufacturer's published listings~~.

~~6.4.3.2.1 Hinges shall be secured in accordance with the listing and the manufacturer's installation instructions.~~

~~6.4.3.3.2 The manufacturer's instructions and published listings for labeled door frames shall be referenced for specific screw requirements.~~

~~6.4.4.7.2 The minimum throw shall be as specified in the manufacturer's installation instructions.~~

~~6.4.4.8.1.1 Pilot holes shall be drilled prior to lock and latch installation, in accordance with manufacturer's installation instructions.~~

6.4.4.8.4 Fire exit hardware and surface-mounted top and bottom bolts shall be attached to wood and plastic-covered composite doors with through-bolts or with steel screws ~~at locations specified in the door manufacturer's installation instructions~~.

~~6.4.4.10.1 Pilot holes shall be drilled prior to strike plate installation, in accordance with manufacturer's installation instructions.~~

~~6.5.2 Manufacturers' Instructions. All components shall be installed in accordance with the manufacturers' installation instructions and shall be adjusted to function as described in the listing.~~

7.3.2.2 The frames shall be erected before the wall is built and securely anchored to the wall and floor ~~in accordance with the manufacturer's installation instructions~~.

~~8.1.3.2 Connection between the panels shall be in accordance with the manufacturer's instructions and the individual published listing.~~

8.1.4.1.1 * Horizontally sliding doors shall be wall mounted in a track attached to a wall or bottom roller mounted with a top guide ~~in accordance with the manufacturer's instructions and individual published listing~~.

8.1.4.1.2 Doors in detention security applications shall be mounted to a listed detention sliding door device ~~in accordance with the manufacturer's instructions and individual published listing~~.

9.1.4.1 * Horizontally sliding accordion or folding doors shall be ceiling or wall mounted in track or tracks attached to a lintel or wall ~~in accordance with the manufacturer's instructions and individual published listings~~.

~~9.2.1.1 Jambs attached to drywall construction shall be in-stalled in accordance with the manufacturer's installation instructions.~~

~~9.2.3.4 Fasteners, if required, shall be in accordance with the manufacturer's installation instructions with spacing over the door stack area equal to half that of normal spacing.~~

~~11.4.3.1.3 * The individual door manufacturer's written installation instructions and listing shall be consulted for the location and amount of clearance required.~~

~~11.4.3.1.6 Attachment of guides to a wall of non-masonry construction shall be in accordance with the manufacturer's written installation instructions and listing.~~

11.4.3.1.9 As an alternative to 11.4.3.1.8, guides shall be permitted to be welded to the jambs ~~in accordance with the manufacturer's written instructions and listing~~.

~~14.1.4.3 Hoistway door frame assemblies shall be installed in accordance with the listing and labeling procedures, including the manufacturer's installation instructions.~~

~~19.2.1 Dampers shall be installed in accordance with the manufacturer's installation instructions and listing.~~

19.2.2 * For new damper installations, the damper manufacturer’s installation and maintenance instructions shall be maintained on site.

19.5.1.4 Position indication functionality shall be permitted to be added to an existing damper not originally designed with position indication provided that the accuracy of the open and closed indication

method is confirmed as required by 19.5.2.3.3.1(C). ~~Any field modifications made to the damper shall be installed per the manufacturer's installation instructions for retrofitted equipment.~~

19.7 Field Modifications.
~~19.7.1 Any field modification made to the damper shall be in accordance with the damper manufacturer's installation instructions and listing.~~

20.6.3 Lift lines and their supporting components and termination shall be rated by the manufacturer for the imposed load~~ and shall be installed in accordance with the manufacturer's instructions~~.

~~21.2.1 Fire protective curtain assemblies shall be mounted to supporting construction in accordance with their listing and with the manufacturer's installation instructions~~.

21.3.2 * Curtains shall be permitted to be sewn by qualified persons ~~in accordance with the manufacturer's instructions.~~

~~21.5 Installation. Fire protective curtain assemblies shall be installed in accordance with their listing and with the manufacturer's installation instructions.~~

~~21.8.2 Resetting of the automatic-closing device shall be performed in accordance with the manufacturer's instructions.~~

4.1.3 Signage. Informational signs shall be permitted to be installed on the surfaces of fire doors in accordance with 4.1.3.1 through 4.1.3.4~~ or in accordance with the manufacturer's published listing~~.

4.8.4.2.1 Where latching hardware devices project from the bottom of the door, the maximum clearance dimension under the door shall ~~be in accordance with the hardware manufacturer's installation instructions~~ not to exceed 3/ 4 in. (19 mm).

Public Input No. 44-NFPA 80-2022 [Section No. 4.2.3]

4.2.3– *

Labels shall be applied to fire doors and fire door frames in locations that are readily visible and convenient for identification by the AHJ after installation of the assembly.

A.4.2.3 This requirement is intended to allow an AHJ or third-party inspector to easily locate required labels for fire doors and frames during field inspections to ensure code compliance. Other components, such as fire door side-lights and door hardware that are part of the fire door or frame listing, are not required to have a separate label that is visible after installation in the assembly.

Statement of Problem and Substantiation for Public Input

This proposal adds clarity for the application location of labels required on fire door assemblies so that the labels are easily visible during inspection.
The Annex Note clarifies that components such as door hardware or side-lights that are certified as a complete fire door assembly are not required to have separate labels indicating a fire rating.

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Committee: FDW-AAA

Public Input No. 14-NFPA 80-2022 [New Section after 4.4.3]

TITLE OF NEW CONTENT

4.4.3.2 Field glazing of labeled vision panels shall be allowed for new wood doors with light cutouts machined under labeled service, when the installation does not require more than two-piece vision panels with glass and supplied fasteners.

Statement of Problem and Substantiation for Public Input

The main rationale behind this proposal is the fact that some glazing options are relatively easy to be installed in the field. Such glazing options are extensively used within the fire door industry and identical glazing units can be installed in wide array of fire rated doors (wood, hollow metal, etc.). Field installation of such glazing options is presently allowed by NFPA80 for all fire doors, except for new wood doors.

Members of WDMA feel that the draft proposal will create equal opportunity for manufacturers and installers of all types of fire rated doors, without jeopardizing safety and overall product performance (given decades of successful track record of field glazed non-wood doors).

Submitter Information Verification

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Committee: FDW-AAA

Public Input No. 13-NFPA 80-2022 [Section No. 4.4.3.1]

4.4.3.1*

For new wood doors, glazing materials in vision panels shall be installed in labeled glass light kits or in accordance with the fire door listing and shall be installed in accordance with inspection service procedure and under label ~~service.~~ service except as allowed per 4.4.3.2.

Statement of Problem and Substantiation for Public Input

The main rationale behind this proposal is the fact that some glazing options are relatively easy to be installed in the field. Such glazing options are extensively used within the fire door industry and identical glazing units can be installed in wide array of fire rated doors (wood, hollow metal, etc.). Field installation of such glazing options is presently allowed by NFPA80 for all fire doors, except for new wood doors.

Members of WDMA feel that this proposal (covered in Section 4.4.3.2) will create equal opportunity for manufacturers and installers of all types of fire rated doors, without jeopardizing safety and overall product performance (given decades of successful track record of field glazed non-wood doors).

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Committee: FDW-AAA

Public Input No. 15-NFPA 80-2022 [New Section after 4.8.6]

4.9* Noncombustible material [101:4.6.13]

4.9.1

A material that complies with any one of the following shall be considered a noncombustible material:

(1)

(1) *

The material, in the form in which it is used, and under the conditions anticipated, will not ignite, burn, support combustion, or release flammable vapors when subjected to fire or heat.

(2)

(2)

The material is reported as passing ASTM E136, *Standard Test Method for Assessing Combustibility of Materials Using a Vertical Tube Furnace at 750°C.*

(3)

(3)

The material is reported as complying with the pass/fail criteria of ASTM E136 when tested in accordance with the test method and procedure in ASTM E2652, *Standard Test Method for Assessing Combustibility of Materials Using a Tube Furnace with a Cone-shaped Airflow Stabilizer, at 750°C.*

A.4.9 The provisions of 4.9 do not require inherently noncombustible materials to be tested in order to be classified as noncombustible materials. [101:A.4.6.13]

A.4.9.1(1) Examples of such materials include steel, concrete, masonry and glass. [101:A.4.6.13.1(1)]

Statement of Problem and Substantiation for Public Input

This public input extracts the information from NFPA 101 about what is a noncombustible material in NFPA codes and standards. Note that NFPA 80 requires materials to be noncombustible in a variety of locations but does not really contain requirements other than a vague definition. An associated PI deletes the definition and refers to this section, as is done in most NFPA codes and standards.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 16-NFPA 80-2022 [Section No. 3.3.93]	
Public Input No. 17-NFPA 80-2022 [Section No. 2.3.2]	

Submitter Information Verification

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Submittal Date:	Sat May 28 15:39:04 EDT 2022
Committee:	FDW-AAA

Public Input No. 48-NFPA 80-2022 [Section No. 5.1.4]

5.1.4 Field Labeling.

5.1.4.1

Field labeling shall be performed only by individuals or companies that have been certified or listed, or by individuals or companies that are representatives of a labeling service that maintains periodic inspections of production of labeled equipment or materials and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

5.1.4.2

Individuals performing the service shall provide proof of qualifications to the authority having jurisdiction prior to performing work, as described in 5.1.4.1.

5.1.4.3

At a minimum, field labels shall contain the following information:

(1) The words “field inspected” or "field labeled"

(2) The words "fire door" or "fire door frame"

(3) The marking of a third-party certification agency

(4) The fire protection rating

(5) A unique serial number (if provided by the listing agency)

(6) The fire test standard designation to which the assembly was tested

5.1.4.4

Field modifications shall not be permitted to be made to a non-fire-rated door assembly to achieve a fire rating unless the field modification is completed under label service.

5.1.4.5

Doors in which a field modification in accordance with 5.1.4.4 has been completed shall be labeled.

5.1.4.6

When an opening with a non-fire-rated door requires a fire door, the door assembly shall be replaced.

Additional Proposed Changes

File Name	Description	Approved
80_A2021_FDW_AAA_SD_PC_4_HeldComment.pdf	NFPA_80_PC_4	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as “Reject but Hold” in Public Comment No. 4 of the F2021 Second Draft Report for NFPA 80 and per the Regs. at 4.4.8.3.1.
Multiple changes to current 2019 language for 5.1.4 Field Labeling. Main points: 1) 5.1.4.1 only allows for "the" original listing agency of "the" product being evaluated in the field to be the ONLY agency allowed to evaluate and provide a Field Label. A few comments about this: a) this places an extreme burden on the facility owner to ascertain not only the original manufacturer of the product. Hard to do when you have a 30-year old hollow metal frame that has multiple coats of paint on it, or a 20-year old

hollow metal door with no production markings remaining. b) even if the owner can figure out the manufacturer, they now need to figure out the original listing agency for that product or if the product happens to be dual-listed. c) some companies for fire rated swinging products are no longer in business and there is no "...listing agency that maintains periodic inspection of production of the labeled equipment or materials under review...". d) there is plenty of evidence, and it has been admitted, that some listing agencies will/have applied field labels to products that they never had the original listing for, so even the current code language is not being lived up to by most or all of the listing agencies. e) sometimes this forces the owner to spend a lot money than necessary to hire multiple listing agencies to perform field labeling, since only the original listing agency can perform the field labeling (if not dual listed) or replace the whole door or frame. f) employees from the original listing agency may not be well versed in the products that they are evaluating. Many times I have walked along side the original listing agency employee only for them to ask me if they should label a product, or not, because they were not experienced enough to make the decision. We need to raise the bar relative to education/training for those people who field label. g) with all the witnessing I have been on with the original listing agency (or someone who said they were), not one time did the employee verify his/her decision by referencing the listing paperwork of the products we were looking at. At least not while onsite while in my presence. 2) 5.1.4.3 (1) thru (6), 5.1.4.4, 5.1.4.5, and 5.1.4.6 need to be more accurate - see my proposed changes. 3) in-general the quality of the inspection company and the person field labeling needs to be increased through initial and ongoing training and standardization to a higher level. This will ensure an informed decision at the opening, performed by a qualified person for field labeling who works for a company that holds itself to a high standard of quality for training, is higher quality for both company and inspector should ensure the facilities are as safe as intended by the building codes and standards.

Submitter Information Verification

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Submittal Date: Wed Jun 01 16:27:19 EDT 2022
Committee: FDW-AAA

Public Comment No. 4-NFPA 80-2020 [Section No. 5.1.4]

5.1.4 Field Labeling.

5.1.4.1

Except as permitted by 5.1.4.1.1, field labeling shall be performed by a qualified person from the listing agency that maintains periodic inspections of production of the labeled equipment or materials under review, and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

5.1.4.1.1

For existing doors, frames, or components only, a qualified person from an approved third-party inspection body with an ISO 17020 accreditation for products pertinent to this standard shall be permitted to perform field labeling.

5.1.4.2

Individuals performing the service shall provide proof of qualifications to the authority having jurisdiction prior to performing work, as described in 5.1.4.1.

5.1.4.3

At a minimum, field labels shall contain the following information:

(1) The words “field inspected” or "field labeled"

(2) The words "fire door" or "fire door frame"

(3) The marking of a third-party certification agency

(4) The fire protection rating

(5) A unique serial number (if provided by the listing agency)

(6) The fire test standard designation to which the assembly was tested

5.1.4.4

Field modifications shall not be permitted to be made to a non-fire-rated door assembly to achieve a fire rating unless the field modification is completed under label service.

5.1.4.5

Doors in which a field modification in accordance with 5.1.4.4 has been completed shall be labeled.

5.1.4.6

When an opening with a non-fire-rated door requires a fire door, the door assembly shall be replaced.

Additional Proposed Changes

File Name	Description	Approved
Public_Comments_option_A_no_mfg_labeling.docx	5.1.4 Field Labeling re-write with Annex comments Option A without mfg ability	
Public_Comments_option_B_with_mfg_labeling.docx	5.1.4 Field Labeling re-write with Annex notes. With mfg ability	

Statement of Problem and Substantiation for Public Comment

Multiple changes to current 2019 language for 5.1.4 Field Labeling. Main points: 1) 5.1.4.1 only allows for "the" original listing agency of "the" product being evaluated in the field to be the ONLY agency allowed to evaluate and provide a Field Label. A few comments about this: a) this places an extreme burden on the facility owner to ascertain not only the original manufacturer of the product. Hard to do when you have a 30-year old hollow metal frame that has multiple coats of paint on it, or a 20-year old hollow metal door with no production markings remaining. b) even if the owner can figure out the manufacturer, they now need to figure out the original listing agency for that product or if the product happens to be dual-listed. c) some companies for fire rated swinging products are no longer in business and there is no "...listing agency that maintains periodic inspection of production of the labeled equipment or materials under review...". d) there is plenty of evidence, and it has been admitted, that some listing agencies will/have applied field labels to products that they never had the original listing for, so even the current code language is not being lived up to by most or all of the listing agencies. e) sometimes this forces the owner to spend a lot money than necessary to hire multiple listing agencies to perform field labeling, since only the original listing agency can perform the field labeling (if not dual listed) or replace the whole door or frame. f) employees from the original listing agency may not be well versed in the products that they are evaluating. Many times I have walked along side the original listing agency employee only for them to ask me if they should label a product, or not, because they were not experienced enough to make the decision. We need to raise the bar relative to education/training for those people who field label. g) with all the witnessing I have been on with the original listing agency (or someone who said they were), not one time did the employee verify his/her decision by referencing the listing paperwork of the products we were looking at. At least not while onsite while in my presence. 2) 5.1.4.3 (1) thru (6), 5.1.4.4, 5.1.4.5, and 5.1.4.6 need to be more accurate - see my proposed changes. 3) in-general the quality of the inspection company and the person field labeling needs to be increased through initial and ongoing training and standardization to a higher level. This will ensure an informed decision at the opening, performed by a qualified person for field labeling who works for a company that holds itself to a high standard of quality for training, process, and ethics. Attaining and maintaining this higher quality for both company and inspector should ensure the facilities are as safe as intended by the building codes and standards.

Related Item

• FR No. 43

Submitter Information Verification

Submitter Full Name:	Jerry Rice
Organization:	DH Pace Company Inc.
Affiliation:	DH Pace family of companies and input from what really happens in the field..
Street Address:	
City:	
State:	
Zip:	
Submittal Date:	Mon May 04 11:55:31 EDT 2020
Committee:	FDW-AAA

Committee Statement

Committee Action:	Rejected but held
Resolution:	The task group on field labeling presented a report that was returned to the task group based on a lack of consensus within the task group and the committee. The comment is being held for further review during the next revision cycle.

DRAFT suggestion for Field Labeling code language for 2022 edition

DRAFT as of 5/4/20 Jr

Option 'A' no mfg labeling in field

5.1.4 Field Labeling.

5.1.4.1* Field labeling shall only be performed by one of the following:

(1) A qualified person employed by the listing agency that maintains periodic inspections of production of the labeled equipment or materials under review

(2)* A qualified person employed by a company accredited, certified or listed to perform such service

5.1.4.2 Prior to performing the work described in 5.1.4 the following shall be provided to the authority having jurisdiction:

(1) Name and address of the field labeling company

(2) Name of the person(s) performing the work

(2) Proof of qualifications of the person(s) performing the work

(3) Name of facility

(4) Address of facility

5.1.4.3 At a minimum, field labels shall contain the following information:

(1) The words "field inspected" or "field labeled"

(2) The words "fire door" or "fire door frame" or "fire exit hardware" or "fire rated"

(3) The marking of the original listing agency, or; a third-party certification agency or; an accredited third-party inspection agency

(4) The fire protection or resistance rating for doors, frames, and glazing

(5) A unique serial number (if provided by the listing agency)

(6) The fire test standard designation to which the assembly was tested

5.1.4.4 Following the performance of the work described in 5.1.4 the following shall be provided to the authority having jurisdiction:

(1) Name and address of the field labeling company

(1) Name of person(s) performing the work

(2) Name of the facility

(3) Address of the facility

(4) A record of the quantity of labels applied

(5) A record of the manufacturer(s) of the equipment or materials under review

5.1.4.5 Field modifications or labeling shall not be permitted to be made to a non-fire-rated door assembly to achieve a fire rating.

5.1.4.6 Where an opening with a non-fire-rated door assembly is required to be fire rated, the door assembly shall be replaced

Annex notes:

A.5.1.4.1 The qualified person performing the field inspection and evaluation to ascertain whether a fire rated swinging door component can receive a field label should have extensive code, testing standard, and product knowledge to ensure fire protection features are not compromised. It is recommended that the qualified person performing field labeling achieve the credential of Certified Fire Door Assembly Inspector (CFDAI through the Door and Hardware Institute) or an equally comprehensive credential or certification.

A.5.1.4.1 (2) To establish at least a minimum level of process quality and standardization, the companies that field evaluate and apply field labels should be ISO 17020 accredited or equal, and have a thorough documented training plan for field labelling personnel.

DRAFT suggestion for Field Labeling code language for 2022 edition

DRAFT as of 5/4/20 Jr

Option 'B' mfg labelling in field

5.1.4 Field Labeling.

5.1.4.1* Field labeling shall only be performed by one of the following:

(1) A qualified person employed by the listing agency that maintains periodic inspections of production of the labeled equipment or materials under review

(2)* A qualified person employed by the manufacturer of the labeled equipment or materials under review, and performed prior to issuance of the Certificate of Occupancy

(3)* A qualified person employed by a company accredited, certified or listed to perform such service

5.1.4.2 Prior to performing the work described in 5.1.4 the following shall be provided to the authority having jurisdiction:

(1) Name and address of the field labeling company

(2) Name of the person(s) performing the work

(2) Proof of qualifications of the person(s) performing the work

(3) Name of facility

(4) Address of facility

5.1.4.3 At a minimum, field labels shall contain the following information:

(1) The words "field inspected" or "field labeled"

(2) The words "fire door" or "fire door frame", or "fire exit hardware" or "fire rated"

(3) The marking of a third-party certification agency or; a third-party certification agency or; an accredited third-party inspection agency

(4) The fire protection or resistance rating for doors, frames, and glazing

(5) A unique serial number (if provided by the listing agency)

(6) The fire test standard designation to which the assembly was tested

5.1.4.4 Following the performance of the work described in 5.1.4 the following shall be provided to the authority having jurisdiction:

(1) Name and address of the field labeling company

(1) Name of person(s) performing the work

(2) Name of the facility

(3) Address of the facility

(4) A record of the quantity of labels applied

(5) A record of the manufacturer(s) of the equipment or materials under review

5.1.4.5 Field modifications or labeling shall not be permitted to be made to a non-fire-rated door assembly to achieve a fire rating.

5.1.4.6 Where an opening with a non-fire-rated door assembly is required to be fire rated, the door assembly shall be replaced

Annex notes:

A.5.1.4.1 The qualified person performing the field inspection and evaluation to ascertain whether a fire rated swinging door component can receive a field label should have extensive code, testing standard, and product knowledge to ensure fire protection features are not compromised. It is recommended that the qualified person performing field labeling achieve the credential of Certified Fire Door Assembly Inspector (CFDAI through the Door and Hardware Institute) or an equally comprehensive credential or certification. The employee of the manufacturer that applies certification labels in the field to their own components should be a qualified person per 3.3.89, but may be exempt from additional certifications since they have production and other chain of custody documents to reference.

A.5.1.4.1 (2) The manufacturer of the fire rated swinging door, door frame, or door component should be allowed the opportunity to field apply their own certification label, in the field, to their new product that has been mistakenly shipped to a construction jobsite without the label or without the proper label, before the owner occupies the facility – pre Certificate of Occupancy.

A.5.1.4.1 (3) To establish at least a minimum level of process quality and standardization, the companies that field evaluate and apply field labels should be ISO 17020 accredited, or equal and have a thorough documented training plan. This does not apply to the original manufacturer applying manufacturer certification labels in the field as noted in 5.1.4.1 (2)* and A.5.1.4.1 (2).

Public Input No. 49-NFPA 80-2022 [Section No. 5.1.4]

5.1.4 Field Labeling.

5.1.4.1

Field labeling shall be performed only by individuals or companies that have been certified or listed, or by individuals or companies that are representatives of a labeling service that maintains periodic inspections of production of labeled equipment or materials and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

5.1.4.2

Individuals performing the service shall provide proof of qualifications to the authority having jurisdiction prior to performing work, as described in 5.1.4.1.

5.1.4.3

At a minimum, field labels shall contain the following information:

(1) The words “field inspected” or "field labeled"

(2) The words "fire door" or "fire door frame"

(3) The marking of a third-party certification agency

(4) The fire protection rating

(5) A unique serial number (if provided by the listing agency)

(6) The fire test standard designation to which the assembly was tested

5.1.4.4

Field modifications shall not be permitted to be made to a non-fire-rated door assembly to achieve a fire rating unless the field modification is completed under label service.

5.1.4.5

Doors in which a field modification in accordance with 5.1.4.4 has been completed shall be labeled.

5.1.4.6

When an opening with a non-fire-rated door requires a fire door, the door assembly shall be replaced.

Additional Proposed Changes

File Name	Description	Approved
80_A2021_FDW_AAA_SD_PC_5_HeldComment.pdf	NFPA_80_PC_5	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as “Reject but Hold” in Public Comment No. 5 of the F2021 Second Draft Report for NFPA 80 and per the Regs. at 4.4.8.3.1.
5.1.4.1.1 • For existing doors, frames, or components only, a qualified person from an approved third-party inspection body with an ISO 17020 accreditation for products pertinent to this standard shall be permitted to perform field labeling.This language must remain as written because it is technically correct. Also, it is in line with industry standard methods and The International Standards (ISO) which is recognized globally.

Submitter Information Verification

Submitter Full Name: TC on FDW-AAA
Organization: NFPA
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Submittal Date: Wed Jun 01 16:34:54 EDT 2022
Committee: FDW-AAA

Public Comment No. 5-NFPA 80-2020 [Section No. 5.1.4]

5.1.4 Field Labeling.

5.1.4.1

Except as permitted by 5.1.4.1.1, field labeling shall be performed by a qualified person from the listing agency that maintains periodic inspections of production of the labeled equipment or materials under review, and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

5.1.4.1.1

For existing doors, frames, or components only, a qualified person from an approved third-party inspection body with an ISO 17020 accreditation for products pertinent to this standard shall be permitted to perform field labeling.

5.1.4.2

Individuals performing the service shall provide proof of qualifications to the authority having jurisdiction prior to performing work, as described in 5.1.4.1.

5.1.4.3

At a minimum, field labels shall contain the following information:

(1) The words “field inspected” or "field labeled"

(2) The words "fire door" or "fire door frame"

(3) The marking of a third-party certification agency

(4) The fire protection rating

(5) A unique serial number (if provided by the listing agency)

(6) The fire test standard designation to which the assembly was tested

5.1.4.4

Field modifications shall not be permitted to be made to a non-fire-rated door assembly to achieve a fire rating unless the field modification is completed under label service.

5.1.4.5

Doors in which a field modification in accordance with 5.1.4.4 has been completed shall be labeled.

5.1.4.6

When an opening with a non-fire-rated door requires a fire door, the door assembly shall be replaced.

Additional Proposed Changes

File Name	Description	Approved
.1588697271835		
80_A2021_Attachment_PC5.pdf	Letter	

Statement of Problem and Substantiation for Public Comment

5.1.4.1.1 • For existing doors, frames, or components only, a qualified person from an approved third-party inspection body with an ISO 17020 accreditation for products pertinent to this standard shall

be permitted to perform field labeling.

This language must remain as written because it is technically correct. Also, it is in line with industry standard methods and The International Standards (ISO) which is recognized globally.

Related Item

• 80-5.1.4.1.1

Submitter Information Verification

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Submittal Date: Tue May 05 12:45:55 EDT 2020
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but held

Resolution: The task group on field labeling presented a report that was returned to the task group based on a lack of consensus within the task group and the committee. The comment is being held for further review during the next revision cycle.

Charles Noble, CFI-1, CFPE
Certified Fire Door Co., Inc.
North Berwick, Maine

To the NFPA-80 Committee
RE: Public Comment May-2-2020

To whom it may concern,

I would like to present a public comment regarding the NFPA-80 discussions on Field Labeling as described in your NFPA-80, 2022, Chapter 5.1.4, Field Labeling.

Note: I will write about the International Standards and how important they are in today's global marketplace later in the letter. However, I am going to reference the ISO /IEC 17020 and ISO/ IEC 17065(in BLUE) within some sentences for clarity.

Note: Much of this letter is in reference to the International Standards because of how important they are in today's global marketplace. I have included my personal exposition of many of the International Standard Laws of both the ISO/ IEC 17020 and the ISO/ IEC 17065 that are noted in the context of this letter as they become relevant.

I am a member of your task force on Field Labeling. I was also in New Orleans where we discussed Field Labeling and we came to a consensus which added language that included Field Inspection.

The New Orleans meeting was very productive. There were challenging discussions, disagreements, and at times tensions were high. However, because the members

of this task force are very smart, very experienced, and have a desire to do the right thing, we came up with what myself and others believed to be perfect language that included both the Certified Service (Testing Labs) and the Inspection Service (Field Inspection Labelers).

Inspection Service has been an important part of the field labeling process for decades.

Unfortunately, as you are aware, the full NFPA-80 committee voted this proposal down.

This puts the end user in a terrible position. Over the last 4 edition cycles, the language has changed to where the NFPA-80 committee has been trying to eliminate the end user's and AHJ's option to use an Inspection Service.

The language that was voted down would have completed the intent of our NFPA-80, 4.2.1* with annex

4.2.1* (2007) (2010) (2013) (2016) (2019) *No language change*

Listed items shall be identified by a label.

A.4.2.1 ANNEX (2007) (2010) (2013) (2016) (2019) *No language changes,*

Labels can be permitted to be metal, paper, or plastics or can be permitted to be stamped or diecast into the item.

Labels should not be removed, defaced, or made illegible while the door is in service. *If the label on an existing fire door has been removed or is no longer legible, it is acceptable to verify the rating through other means acceptable to the authority having jurisdiction such as inspection or certification service that provides acceptable documentation.*

Except for this Annex A 4.2.1 section the 80 Standard does not specify what to do about removed or defaced certification labels until the language was added in 2016. Also, the standard does not make it clear that a "Label" as described in 4.2.1, is in fact a Certification Label.

As you are aware, Field Labeling started to come to the forefront with the 2019 edition. This changed the definition of field labeling to only allow Certification Services to apply field labels.

Up until 2015, field labels have been applied in the field by what we call “Testing Labs” which are accredited to 1. Test, 2. Certify, 3. Inspect.

UL, W/H Intertek, Guardian along with one or two other companies that call themselves “Testing Laboratories” were the only companies doing the field labeling. Today, inspection agencies have entered this industry that do not test or certify products but simply field inspect and label.

The AHJ and end user need another resource to rate their fire door products. Field labeling Agencies, accredited through ISO / IEC 17020 standards rely on professional judgement, using technical knowledge of the product being inspected.

Accredited Field Labelers must have in-house technical documents that prove the fire rating and experienced personnel in the field.

Testing, Certification and Inspection are all related fields and do cross over, but on a limited basis. They have very different disciplines and responsibilities and it is imperative that these disciplines and responsibilities do not conflict. These disciplines by International Standards laws, that police each company through yearly audits to verify that they are maintaining proper business practices which includes auditing the company and the personnel to verify competency in their field, ethical and impartial practices.

The certification agency is concerned about who made the product (client) using testing data that was

provided by the testing lab. The testing body and certification body are two different disciplines, as per the International Standard ISO /IEC 17065:6.2 and cannot conflict. See below.

ISO /IEC 17065: 6.2

Resources for evaluation activities

ISO /IEC 17065: 6.2.1 Evaluation activities

In an event of a certification body carrying out an evaluation, regardless of the material and references used, it must meet all the requisite information as per the corresponding International Standard. Testing is beholden to ISO/IEC 17025 and Inspection to ISO/ IEC 17020

In this excerpt, it is noted that there are different requirements for Certification and Inspection. This is the same with Certification Labels and Inspection Labels.

In the NFPA 80 world, this is defined in, Chapter 4, General Requirements, Section 4.2.5 Listed and Labeled Products.

This difference is apparent again. See below

NFPA-80, 2019: 4.2.5

The label or the listing shall be considered evidence that samplings of such devices or materials have been evaluated by tests and that such devices or materials are produced under an in-plant, follow-up inspection program.

Also, in NFPA-80, Chapter 3, Definitions

NFPA-80, 2019: 3.2.3 Labeled.

Equipment or materials to which has been attached a label, symbol, or other identifying mark of an organization that is acceptable to the authority having jurisdiction and concerned with product evaluation, that maintains periodic inspection of production of labeled equipment or materials, and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

NFPA-80, 2019: 3.2.4 * Listed.

Equipment, materials, or services included in a list published by an organization that is acceptable to the authority having jurisdiction and concerned with evaluation of products or services, that maintains periodic inspection of production of listed equipment or materials or periodic evaluation of services, and whose listing states that either the equipment, material, or service meets appropriate designated standards or has been tested and found suitable for a specified purpose.

Whenever you see the words" ... that maintains periodic inspection… this means Certification, which requires the Certification agency and the manufacturer of the product (Client) to have a contracted agreement to certify.

These documents belong to the factory (client) and not the certification agency. This data is strictly confidential and can only be released with permission from the factory (Client). This is regulated by ISO laws. The Certification Service is also a legal entity bound by International Standards.

ISO /IEC 17065: 4

General requirements

ISO /IEC 17065 4.1 Legal and contractual matters

ISO /IEC 17065 4.1.1 Legal responsibility

A certification body must be a legal entity or fall under the umbrella of a legal entity with a clearly defined relationship between the two, the certification body, and the client. This ensures legal responsibilities for any action involving certification.

ISO /IEC 17065: 4.5
Confidentiality

ISO /IEC 17065: 4.5.1 Legal Responsible together information

The Certification body is legally responsible for handling any information developed or gathered during a certification, excluding any material that is already publicly available or material agreed upon between the certification body and the client. Any agreements about public and private information must be established prior to any services performed. Information that does not fall under these parameters is constituted as confidential.

ISO /IEC 17065: 4.5.2

A certification body is legally bound, or contractually obligated to release confidential information all parties involved must be first notified, unless legally prohibited

ISO /IEC 17065: 4.5.3

All information received regarding the client, regardless of the source must be confidential.

When the NFPA-80 Committee voted down the proposed language by their own task force, this then eliminated third party inspection services, creating a monopoly and ultimately puts the end user in a real bad spot. Here's why.

The current 2019 language reduced the field labeling service to allow for only two companies. UL and Intertek. All other are out of business.

UL's representative, Al Ramirez and Intertek's representative Justin Hendricks have both testified before the task force that their companies have policies that their companies will not field label a product unless they have the name of manufacturer (Client) and when the product was manufactured.

UL also has a policy that they will not apply a certification label one year after leaving the factory.

Since UL and Intertek are both legally bound through the International Standard, ISO /IEC 17065, the end user cannot initiate the request to field label without the permission from the manufacturer, their client.

And the manufacturer (the client) wants to make sure UL and, or Intertek certify only their product with their name and not someone else's product, accidentally.

Certification services cannot put a field label on a product unless they have permission from their client first, before going into the field as per ISO /IEC 17065 laws.

The testimonies from both UL's Al Ramirez and Interek's Jason Hendricks have expressed how their companies are shrinking significantly the ability to field label products. The end user finds himself having to replace perfectly good doors, frames and hardware, all unnecessarily, simply because they cannot supply documentation required for UL and Intertek's increasingly narrow and bias rules for labeling.

Also, because the federal government through CMMS requires all fire doors to be inspected annually, and if a label is missing, they have 30 to 45 days to label the product or replace it. It will be more effective to replace the door product then take a chance on losing their Medicare / Medicaid funding.

This will cost healthcare facilities millions of dollars a year by forcing them to purchase new doors, frames and hardware simply because the NFPA-80 committee eliminated a valuable resource, Inspection Services. However, a boon for the SDI, WDMA, BHMA, and DHI people they represent.

The solution is and always has been the inspection service for the AHJ and the end user. THE NFPA-80 Committee needs to bring back the Inspection Service which is based upon the Accredited ISO /IEC 17020 Inspections.

I realize that over the years field labeling has had a bad reputation in the Door Industry because of unqualified people applying field labels that don't have the professional knowledge of the product they are field labeling. But in that same vein it was the "Testing Labs", UL and Intertek, those that are going to monopolize the field labeling business that were being criticized during the task force meeting for unqualified people field labeling fire doors and frames along with other fire door components.

There is a lot of criticizing to go around. UL and Interek are not the only “Testing Labs” needing criticism.

What’s behind us is behind us, and as a member of this task force I want to do what’s best for the future as does everyone else.

There are some very valid issues regarding the Inspection Services doing the field labeling of fire door products. Inspection services include the old guard testing labs, UL, Intertek, Guardian to name a few, and now new, smaller inspection companies doing field labeling.

Here is a list of concerns:

1) Unqualified people applying Field Inspection labels
2) Field labels put in toolboxes by carpenter as if they are tools and part of fix and not an inspection.
3) Labels loosely distributed by testing labs and the new inspection bodies.
4) Putting a generic label on all products.
5) No traceability.
6) Companies not taking this Field labeling business seriously.
7) No regard for codes.
8) No oversite of the field labeler.

9) No consequence.
10) A lack of understanding of the International Standards ISO /IEC 17065 Certification Service and the ISO /IEC 17020 Inspection Service, that over see our industry, both here in the US, and around the globe, and just how powerful these accreditations are.

All the issues come down to three things.

The perceived appearance of unqualified people applying Field Inspection labels and Certifications labels.

Their companies not taking field labeling seriously.

The lack of knowledge, understanding and authority of the International Standard to which we all must comply.

To explain the Inspection Service and how we are accredited to field labeling I must explain the International Standard, the ISO /IEC 17020 Inspection and how it differs from the ISO /IEC 17065 Certification.

In a nutshell, Certification Bodies use testing data. Inspection Bodies use Professional Judgements from experienced professionals who have technical knowledge of the product being inspected.

In our world it should be door professionals who have the credence and understanding of the fire door product they are inspecting for field labeling.

To field label fire door products, you must be accredited to Inspect with a nationally recognized accreditation manager. My company is accredited with ANAB (ANSI /National Accreditation Board).

In the United States ANAB manages the International Standards for Inspection, ISO /IEC 17020 as well as IAS.

ANSI manages the Testing Labs (Bodies) through the ISO/IEC 17025 and The Certification Bodies through the International Standard ISO / IEC 17065.

If you want to inspect a product or a service and have it be recognized globally you have to use the International Standards and it has to be managed by a manager such as ANAB or IAS. For Certification, the same process but it is managed through ANSI or IAS.

The International Standards were created so there would be a global understanding of how to do business around the world. The International Standards are based in Geneva Switzerland.

ISO is not an acronym; ISO is a Greek word meaning Equal. They developed the ISO standards so the world can do business ethically, and without outside influences, preventing monopolies or companies doing service unethically.

For example, if you are selling oranges, in the US, the FDA wants them inspected and the inspection agency would need to be accredited by a nationally recognized agency or service such as ANAB or IAS using ISO /IEC 17020.

ANAB then would go over every aspect of your business and then put it in line with the International Standard. In our case the ISO /IEC 17020 for Inspection, the company is now legally responsible to conduct business, ethically, morally, without conflict and impartial to the International Standard.

Now that the orange business can sell their oranges in the US because the FDA recognizes the accredited ANAB inspection company. Also, the oranges can sell to any country that recognizes the ANAB accreditation inspection company, which is mostly all the free world countries and hopefully the NFPA-80 Committee.

Here in lies the rub.

I have identified 10 issues that concern the 80 Committee regarding field labeling. I am sure we could double the count easily.

All the parties involved are either accredited through ANAB and /or ANSI.

Why hasn't ANAB or ANSI done anything about these and many other concerns. Why does the NFPA-80 committee need to step in and police the certification bodies and inspection bodies of their apparent wrong doings. After all, wasn't the International Standards created to make sure all their accredited companies are doing business ethically, professional and to standards such as the intent of the NFPA-80.

It is because ANAB hasn't had a single complaint filed against any of their accredited companies or personal.

All accredited bodies including ISO /IEC 17020 Inspection bodies are subject to a yearly audit by ANAB.

All complaints will be reviewed by ANAB, during the annual audit. The complaint needs to be addressed and be reviewed as per the ISO/ IEC 17020: 7.5. Please read below.

This is more than the NFPA-80 could ever impose.

But a complaint needs to be filed for the company to take action.

All ISO /IEC 17000 bodies must have a method or a way for complaints about their company or their personnel.

Anyone can make a compliant and by the International Standards, all compliant/s will be audited, in our case by ANAB.

All complaints must be handled impartially.

All ISO /IEC 17020 complaints are handled seriously and impartially please read below.

ISO /IEC 17020: 3.10
Complaint definition

The expression of discontent or dissatisfaction as expressed by a person or organization with an expected response, to an inspection body in reference to an action related to activities performed by the inspection body.

ISO /IEC 17020: 7.5
Complaints, appeals

ISO /IEC 17020: 7.5.1 Complaint Documents

The inspection body is required to have a documentable process all the way from receival to decisions for all complaints and appeals

ISO /IEC 17020: 7.5.2, Complaint document to all interested parties

The inspection body must be able to provide the documentation of the complaints and appeals as to how complaints and appeals are handled if requested by any interested party.

ISO /IEC 17020: 7.5.3 Actions of the complaint

Once a complaint is received, the inspection body must asses and determine whether the actions related to the complaint are indeed inspection activities. If they are, then action must be taken to address it.

ISO /IEC 17020: 7.5.4 Handling the complaint

The inspection body is required to handle the decision making for all complaints and appeals at every phase of the process.

ISO /IEC 17020: 7.5.5 Appeal decisions

Discriminatory actions cannot take place regarding the investigation, decisions of the appeals process.

ISO /IEC 17020: 7.6
Complaints / appeals process

ISO /IEC 17020: 7.6.1 Proper steps of a complaint

The minimum required steps for managing complaints and appeals are as follows:

1. written documentation for of the entire process from receiving complaint/ appeal through the decision-making process.
2. Documentation of any actions being taken in response the decision such as corrective actions being taken, record keeping etc.
3. Following up to ensure corrective action was taken.

ISO /IEC 17020: 7.6.2 Gathering complaint information

Once a complaint or appeal is received it is the Inspection bodies responsibility to gather, authenticate and certify all information in reference to the complaint or appeal.

ISO /IEC 17020: 7.6.3 Complaint Notification

The inspection body must inform the person or organization filing the complaint or appeal once it has been received.

The inspection body also must provide status updates of the process as much as possible as they become available.

ISO /IEC 17020: 7.6.4 Impartial Investigation

Third party individual(s) that are not involved in the original inspection are required to make or review the mode in which the decision of the complaint or appeal shall be communicated.

ISO /IEC 17020: 7.6.5 Complaint file closing

If possible, the inspection body must provide official notice at the closing of the complaint or appeal.

If you believe that someone, doing a Field Labeling Inspection or Certification Label in the field, and you don't believe the Inspector did it properly, it is your responsibility to file a complaint with that company and that compliant and outcome will reviewed by ANAB during their annual audit.

The Inspection company's upper management is responsible for training and competency of their inspectors in the field.

6 Resource requirements

ISO /IEC 17020: 6.1 Personnel

ISO /IEC 17020: 6.1.1 Personnel qualifications

The inspection body must keep detailed personnel files for all personnel involved in inspection activities, with information including their education, training, technical understanding, skillset and relevant experience.

ISO /IEC 17020: 6.1.2 Personnel staffing

The inspection body is required to have enough staff, whether it be through employees or contracted persons to be able to properly perform the inspection activity including location relevance, professional understanding, and technical knowledge, that is required to perform the inspection activities.

ISO /IEC 17020: 6.1.3 Personnel Training

Inspection bodies personal, responsible for carrying out inspection activities must have the appropriate qualification, experience, and technical knowledge of the product or service that they are inspecting.

The personnel must also have

1. Knowledge of the technology used to manufacture products being inspected
2. Knowledge of the product being inspected
3. Any potential foreseeable defects of the product
4. Any foreseeable failures in operation of the product they are inspecting
5. Any foreseeable issues with delivery of service of the product

ISO /IEC 17020: 6.1.4 Personnel responsibilities

The inspection body is responsible for making sure all personnel understand the duties and responsibilities required from each position.

ISO /IEC 17020: 6.1.5 Personnel Resources

The inspection body must have the appropriate documentations for the entire onboarding process for bringing on personnel involved in the inspection activities including selection, training, formal authorization and monitoring.

ISO /IEC 17020: 6.1.6 Personnel mentoring

The onboarding process as detailed in 6.1.5, must have at least a three phase process including an introduction period, mentor period- including field work with an experienced inspector(s), continued training process to ensure up to date knowledge and understanding of new technologies and methodologies for inspection.

ISO /IEC 17020: 6.1.7 Personnel qualifications

Each new personnel's training is dependent on and will be tailored to the inspector's qualifications and previous experience and will be monitored as needed.

ISO /IEC 17020: 6.1.8 Personnel mentor

Experienced personal shall be responsible for monitoring inspection procedures of other inspectors to monitor the inspection activities. The findings will be used as a tool to determine the needs of the training process.

ISO /IEC 17020: 6.1.9 Personnel, onsite training

All inspection body personal responsible for inspection must be observed in the field, unless there is supporting sufficient information that proves that they are performing all inspection activities to the standard.

ISO /IEC 17020: 6.1.10 Personnel records

The inspection body is responsible to recording and managing records for all personnel involved in the inspection process including monitoring, education, training, technical knowledge, skills, experience and authorization.

ISO /IEC 17020: 6.1.11 Personnel graft

Personnel involved in the inspection must never be involved in the exchange of payment for services rendered, or work done.

ISO /IEC 17020: 6.1.12. Personnel impartiality

All personal involved with the inspection body, that have any involvement or influent in an inspection must always act with impartiality and unbiasedness.

ISO /IEC 17020: 6.1.13 Personnel confidentiality

All personnel associated with the inspection body, both internal and external, subcontractors and any party acting on the inspection bodies behalf must keep all information regarding the inspection confidential, except in an instance where it is required by law.

ISO /IEC 17020: 5.2.5 a Personnel oversite

The technical manager of an inspection body must have the technical understand in experience required to act in the roll. If there is an instance where there is more than one technical manager within an inspection body the specific rolls and responsibilities of each technical manager must be clearly defined.

Upper management of an ISO /IEC 17020 company is responsible for all its personnel involved in inspection including competency, complaints, training and audits.

ISO /IEC 17020:8.2 Management system documentation

ISO /IEC 17020 8 2.1 Upper managements responsibilities to the field inspectors

Within an inspection body, it is the responsibility of the top management to understand and curate the necessary policies and documentation to comply and fulfill the International Standard. It is also top management's responsibility to ensure that the standards are acknowledged, implemented and enforced on all levels of the inspection body.

The reports must have traceability to the inspector.

ISO /IEC 17020: 7.3

Inspection and records

ISO /IEC 17020: 7.3.1 Maintaining records

The inspection body is required to have a record system where the inspection body is to exemplify the inspection procedures to determine the ability of an inspection.

ISO /IEC 17020: 7.3.2 Record traceability

There must be a traceable record to the inspector(s) who performed the inspection activities through either the inspection report or certificate.

Conclusion

The current language changes nothing. The testing labs will continue as usual. The only difference is there will be only two companies allowed to go out in the field and label fire door products.

There will be no oversite. It will be business as usual.

The new field inspection companies will be forced out of business because of this NFPA code enforcement.

The new labeling companies do take this inspection business seriously.

If there is an issue, file a compliant and the International Standards will judge.

The International Standards will make everyone better through ANAB and IAS if it is allowed.

Remember, the testing laboratories did not engineer our products, door people did through individuals who created associations like SDI, WDA, WDMA and BHMA. All commercial door people.

-29-

The NFPA needs to reconsider the language that was voted down at the last committee meeting. There is another way to label these doors and that is through the Inspection Services as described in 4.2.1.

The new Inspection Services need to be given a chance and ANAB and IAS need to do there due diligence and make all inspection services abide by the ISO/ IEC 17020 standards and bring professionalism, competency, and education back into the inspection service also known as Field Labeling.

Thank you very much,

Charles Noble

-30-

Public Input No. 6-NFPA 80-2022 [Section No. 5.1.4.1]

5.1.4.1– _ Field

~~labeling~~

Labeling shall be performed

~~only by individuals or companies that have been certified or listed, or by individuals or companies that are representatives of a labeling service that~~

by an accredited Testing, Inspection and Listing agency or their representative that maintains periodic inspections of production of the labeled equipment or materials

~~and by whose~~

. Field Labeling of modified equipment or materials shall only be performed by the listing agency who's labeling the manufacturer indicates compliance with the appropriate standards or performance in a specified manner.

Statement of Problem and Substantiation for Public Input

The current language in 5.1.4.1 is confusing, incorrect and does not address some key situations.

The current language would indicate that either the manufacturer or a labeling service can field label products, specifically with the inclusion of "Field labeling shall be performed only by, individuals or companies that have been certified or listed, ...".

To our knowledge manufactures are only authorized by listing agencies to attach Fire Rating Labels to their product at there place of manufacturer and only under specific controlled conditions. The listing agencies do not normally allow a manufacturer to attach a Fire Rating Label in the field so the statement "individuals or companies that have been certified or listed" is incorrect and should be removed, these companies or individuals are not allowed to field label products.

The term "Labeling Service" is not defined, while it implies a Listing Agency that list products, it is open to interpretation.

The typical case for the requirement of Field Labeling occurs for two reasons:

1. A listed product is modified in the field, in this case the current language appears to be correct. In fact, if you go back to NFPA 80-2013 Section 5.1.4 was labeled as Field Modifications. For listed product that is modified in the field the standard practice is to have the original listing agency evaluate the modification and determine if the label on the product is still valid or needs to updated or removed.

2. A product is found in the field that is not labeled, the label has been removed or obliterated such that the original listing agency is no longer readily known. To our knowledge this addresses the vast majority of "Field Labeling" and is not clearly addressed by the current wording. It is QAI's opinion that the intent of NFPA 80 is that the best agency to make a determination on whether the equipment or materials meet the requirements is for an agency that routinely conducts testing, inspection and listing of these types of products and for that agency to conduct an onsite evaluation to determine if there is evidence to support compliance or if testing or other evaluations need to be conducted. QAI would note that this has been the industry norm for Field Labeling of Fire Protective Openings for over a quarter century. Since the products are un-labeled, there is no way to identify the "original Listing agency" if any, so to have this as a requirement is inappropriate. QAI does feel strongly that the Field Evaluation and associated Field Labeling should only be conducted by agencies that have knowledgeable individuals who are familiar with the testing requirements and the manufacturing quality control issues associated with these products to support the evaluation. To our knowledge a number of

agencies that have been recently accredited as Fire Door Inspection Agencies to ISO/IEC 17020 do not have this expertise.

Submitter Information Verification

Submitter Full Name: Frank Buyna
Organization: QAI Laboratories
Street Address:
City:
State:
Zip:
Submittal Date: Fri Feb 18 12:51:13 EST 2022
Committee: FDW-AAA

Public Input No. 54-NFPA 80-2022 [Section No. 5.1.4.3]

5.1.4.3

At a minimum, field labels shall contain the following information:

(1) The words “field inspected” or "field labeled"

(2) The words "fire door" or "fire door frame"

(3) The marking of ~~a~~ the third-party ~~certification agency~~ applying the field label

(4) The fire protection rating

(5) A unique serial number (if provided by the listing agency)

(6) The fire test standard designation to which the assembly was tested

Additional Proposed Changes

File Name	Description	Approved
80_A2021_FDW_AAA_SD_PC_42_HeldComment.pdf	NFPA_80_PC_42	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as “Reject but Hold” in Public Comment No. 42 of the F2021 Second Draft Report for NFPA 80 and per the Regs. at 4.4.8.3.1.
Resolves a conflict requiring a field label to use a mark other than their own.

Submitter Information Verification

Submitter Full Name: TC on FDW-AAA
Organization: NFPA
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 16:51:51 EDT 2022
Committee: FDW-AAA

Public Comment No. 42-NFPA 80-2020 [Section No. 5.1.4.3]

5.1.4.3

At a minimum, field labels shall contain the following information:

(1) The words “field inspected” or "field labeled"

(2) The words "fire door" or "fire door frame"

(3) The marking of ~~a~~ the third-party ~~certification agency~~ applying the field label.

(4) The fire protection rating

(5) A unique serial number (if provided by the listing agency)

(6) The fire test standard designation to which the assembly was tested

Statement of Problem and Substantiation for Public Comment

Resolves a conflict requiring a field label to use a mark other than their own.

Related Item

• PI6

Submitter Information Verification

Submitter Full Name: David Feist
Organization: [Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 06 15:00:06 EDT 2020
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but held

Resolution: The task group on field labeling presented a report that was returned to the task group based on a lack of consensus within the task group and the committee. The comment is being held for further review during the next revision cycle.

Public Input No. 9-NFPA 80-2022 [New Section after 5.2.3]

Special -Purpose Horizontally Sliding Accordion or Folding Doors

Create minimum inspection criteria for these types of doors similar to what is written for Swinging Doors (5.2.3.5.2), and (5.2.3.6.2) and Rolling/sliding (5.2.3.7.2). Make any other changes needed in Chapter 4, 5, and 9 as needed.

Statement of Problem and Substantiation for Public Input

All fire rated doors require 'Acceptance' and 'Periodic/Annual' inspection and testing. Criteria is already established for swinging, rolling, sliding doors but not for accordion doors. This leaves this type of door inspection open for interpretation of whether this type of door needs inspection, and if yes, to what criteria? This is a gap in the NFPA 80 Standard. The inspection criteria should be written to be general to all mfgs and models of accordion doors, or defer to mfg instructions for specific inspection criteria.

Submitter Information Verification

Submitter Full Name:	Jerry Rice
Organization:	DH Pace Company Inc.
Affiliation:	DH Pace Company and as a member of NFPA 80/105 Technical committee to improve the Standard
Street Address:	
City:	
State:	
Zip:	
Submittal Date:	Wed May 04 11:47:33 EDT 2022
Committee:	FDW-AAA

Public Input No. 3-NFPA 80-2021 [New Section after 6.3.1.6]

Adjustable Frames

Adjustable frames are allowed as long as it has been fire labeled by concerned laboratory.

Statement of Problem and Substantiation for Public Input

It is important to mentioned the adjustable frames since this question is often asked by consultants if it is allowed

Submitter Information Verification

Submitter Full Name: Bilal Saad
Organization: [Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Thu Dec 30 01:04:13 EST 2021
Committee: FDW-AAA

Public Input No. 4-NFPA 80-2021 [New Section after 6.3.5.2]

Multiple frame with metal mullion or bar

mullion or steel bar is allowed as long as it is tested with the full component of the door

Statement of Problem and Substantiation for Public Input

where multiple frames are present the separation can be wall/concrete or metal as long as it is fire rated, as for metal it is already fire resistant

Submitter Information Verification

Submitter Full Name: Bilal Saad
Organization: [Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Thu Dec 30 01:07:19 EST 2021
Committee: FDW-AAA

Public Input No. 35-NFPA 80-2022 [Section No. 6.4.1]

6.4.1 Closing Devices.

6.4.1.1*

Unless otherwise permitted by the AHJ, a closing device shall be installed on every fire door.

6.4.1.2 Door closers shall be listed and labeled in accordance with UL 228.

6.4.1.2 Coordinating Device.

6.4.1.2.1

Where there is an astragal or projecting latch bolt that prevents the inactive door from closing and latching before the active door closes and latches, a coordinating device shall be used.

6.4.1.2.2

A coordinating device shall not be required where each door closes and latches independently of the other.

6.4.1.3

All components of closing devices used shall be attached securely to doors and frames by steel screws or through-bolts.

6.4.1.4*

All closing mechanisms shall be adjusted to overcome the resistance of the latch mechanism so that positive latching is achieved on each door operation.

6.4.1.5

Spring hinges shall be adjusted to achieve positive latching when the door is allowed to close freely from an open position of no more than 30 degrees.

6.4.1.6

Where door holder/release devices are used, they shall be labeled.

Statement of Problem and Substantiation for Public Input

UL 228 is the current and past test method for fire door closers, including the minimum required cycle count, closing force, and closing speed specifications. In addition, UL 228 is the test method used for the certification of listed and labeled fire door closers, allowing these products to be sold for use on fire rated doors. This proposal will not increase the cost of construction. Renumber accordingly.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 34-NFPA 80-2022 [Section No. 2.3.6]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
Organization: UL LLC
Street Address:
City:

State:	
Zip:	
Submittal Date:	Wed Jun 01 10:59:06 EDT 2022
Committee:	FDW-AAA

Public Input No. 43-NFPA 80-2022 [Section No. 6.4.4.10]

6.4.4.10

Strike plates for doors swinging in pairs shall be secured to reinforcements in the inactive leaf ~~with machine screws~~ with screws .

6.4.4.10.1

Pilot holes shall be drilled prior to strike plate installation, in accordance with manufacturer's installation instructions.

Statement of Problem and Substantiation for Public Input

Machine screws and pilot holes don't go together. Machine screws are usually metal to metal and require tapped holes. Pilot holes are for wood screws. Some modification is required. I suggest deleting 6.4.4.10.1 if my new 4.3 is accepted, and delete "machine" from 6.4.4.10.

Submitter Information Verification

Submitter Full Name: William Conner
Organization: Bill Conner Associates LLC
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 13:11:00 EDT 2022
Committee: FDW-AAA

Public Input No. 1-NFPA 80-2021 [New Section after 6.4.4.12]

Electric strike type
Only fail secure electric strike are allowed to maintain positive latching

Statement of Problem and Substantiation for Public Input

It should be clear that electric strike fail safe should not be allowed.

Submitter Information Verification

Submitter Full Name: Bilal Saad
Organization: [Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Thu Dec 30 00:58:44 EST 2021
Committee: FDW-AAA

Public Input No. 2-NFPA 80-2021 [New Section after 6.4.4.12]

Electrified locks

Both fail safe and fail secure electrified locks are allowed since they maintain positive latching.

Statement of Problem and Substantiation for Public Input

It should be clear that electrified lock fail safe and secure both can be used because it maintains positive latching, however fail safe electric strike should be clearly mentioned that it is not allowed.

Submitter Information Verification

Submitter Full Name: Bilal Saad
Organization: [Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Thu Dec 30 01:01:46 EST 2021
Committee: FDW-AAA

Public Input No. 8-NFPA 80-2022 [Sections 6.4.5.1, 6.4.5.2, 6.4.5.3]

Sections 6.4.5.1, 6.4.5.2, 6.4.5.3

6.4.5.1

Factory-installed ~~protection~~ , or Field-installed protection plates shall ~~be labeled and installed~~ be installed in accordance with the manufacturer's listing of the door.

6.4.5.2 –

~~Field-installed protection plates shall be labeled and installed in accordance with their listing.~~

~~6.4.5.3~~ –

Labeling shall not be required where the top of the protection plate is not more than 16 in. (406 mm) above the bottom of the door.

Additional Proposed Changes

File Name	Description	Approved
Protection_Plates_ROPF1998-80-105.pdf		
GVUZ_UL_s_category_for_Cladding_materials_on_fire_doors.pdf		

Statement of Problem and Substantiation for Public Input

In 1998 a submittal was made to allow for protection plates larger than 16” above the bottom of the door. The justification at the time was that in healthcare occupancies, protection plates are often used on fire doors to minimize damage resulting from stretchers, gurneys, etc. As a result, The Joint Commission was issuing citations for protection plates that extended beyond 16” from the bottom of the door. At that time, the Committee Action response was to allow for Non-Labeled Factory installed protection plates in accordance with the door manufacture’s listing but, Field installed protection plates had to bear a label (see uploaded NFPA 80-F98 ROP). This created confusion in the field as to which protection plates were factory installed vs. field installed. In addition, UL Guide Info for GVUZ – Cladding Materials for Fire Doors and Frames (see attached GVUZ Information) referred to marking on the carton or package.
It is also important to note that NFPA 101 still has several situations that allow for non-labeled protection plates, such as fire rated doors on hazard rooms. There should be consistency, between the NFPA 101 code and the NFPA 80 standard, and at the end of the day, the door manufacturer’s listing should be the determining factor for acceptable protection plates.

Submitter Information Verification

Submitter Full Name: Craig Ordmandy
Organization: Door Control Services, Inc.
Affiliation: DH Pace Compliance Services
Street Address:
City:
State:
Zip:
Submittal Date: Fri Apr 22 16:26:52 EDT 2022
Committee: FDW-AAA

1-10.3 Where smoke detectors are used, they shall be located in accordance with NFPA 72, National Fire Alarm Code.
(Delete 2-8.7.1 in part, 3-11.1.2, 4-8.2, 5-9.3.1(c), 6-6.3, 7-7.1 and 12-4.1.2).
1-10.4 Detectors and their components shall be installed in accordance with the manufacturer's instructions.
(Delete 2-8.7.2, 3-11.2, 5-9.3.2, 6-6.4, 12-4.1.3).
1-10.5 Detectors or fusible links shall be installed on both sides of the wall, interconnected so that the operation of any single detector or fusible link causes the door to close.
Exception: A detector or fusible link shall not be required on the exterior (outside) wall. [See Figures B-30, B-32, B-36(a), B-36(b), B-39(a), B-39(b)].
(Delete 3-11.1, 4-8.1(Paragraph 1), 5-9.3.1, 6-6.1, 12-4.1).
1-10.5.1 Where fusible links are used, one fusible link shall be located near the top of the opening, and additional links shall be located at or near the ceiling on each side of the wall. [See Figures B-41 through B-44(a), B-48 through B-50].
Exception No. 1: For horizontally sliding doors, one fusible link shall be installed just above the opening or on an arm projecting from the leading edge of the door.
Exception No. 2: For tin clad and sheet metal doors, one fusible link shall be located at the center near the bottom of the door and additional links shall be located at or near the ceiling on each side of the wall. [See Figures B-45 and B-46].
Exception No. 3: For steel sectional doors, one fusible link shall be located near the top of the opening near the automatic release mechanism on the door in an area where there is no obstruction to the circulation of air, and additional links shall be located at or near the ceiling on each side of the wall. [See Figure B-47].
Exception No. 4: For shutters, fusible links shall be located in the proximity of the shutter near the top of the opening and in an area where there is no obstruction to the circulation of air.
(Delete 3-11.1.1,4-8.1(Paragraph 2),5-9.3.1, 6-6.2,10-4, 12-4.1.1).
SUBSTANTIATION: Centralize the requirements in the chapters into one location for easier reference. There will be no change in content only a reorganization of the language.
COMMITTEE ACTION: Accept.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 23
NEGATIVE: 2
NOT RETURNED: 1 Meyer
EXPLANATION OF NEGATIVE:
KOFFEL: Proposed paragraph 1-9.5, while consistent with some sections in NFPA 80, is more restrictive than current text and no substantiation has been provided. Furthermore, the requirement to provide detectors on both sides of the door is more restrictive than NFPA 72, unless paragraph 1-9.5 is intended to apply to heat detectors only. Note that paragraph 1-9.3 refers to NFPA 72 for smoke detectors. While NFPA 72 addresses smoke spread, and therefore a conflict may not exist, if one detector is adequate per NFPA 72 why is it not adequate for NFPA 80.
SAINO: Exception No. 1 is incorrect and was probably intended for horizontally sliding tin clad or sheet metal doors but is still incorrect even for them. It should be deleted entirely. Exception No. 2 should read for "vertically sliding" tin clad and sheet metal doors.

(Log #4)

80- 19 - (2-6.6 (New)): Reject
SUBMITTER: Thomas R. Janicak, Steel Door Inst.
RECOMMENDATION: Add new text as follows:
2-6.6 After the mechanical corner connections of labeled knock-down frames are completed, the corner seams shall be permitted to be welded at the job site.
SUBSTANTIATION: Labeled fire door frames have been designed as knock-down assemblies to permit inventory flexibility at a distributors facility as well as simplify shipping. The addition of welding the seams at the locations other than under label service for aesthetic purposes would not degrade the anticipated performance of the frames.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: There is concern regarding distortion of lighter weight frames.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 24
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #2)

80- 20 - (Table 2-8.1.1): Accept in Principle
SUBMITTER: James S. Lace, Kalamazoo, MI
RECOMMENDATION: Revise Table 2-8.1.1 (Now Table 2-4.3.1.1) Builders Hardware Mortise and Surface Hinges, Pivots, or Spring Hinges for Swinging Doors to read as follows:
Builders Hardware Mortise, Surface, and Full Length Continuous Hinges, Pivots, or Spring Hinges for Swinging Doors.
Add to end of paragraph: "Appropriate full length hinges are also acceptable."
SUBSTANTIATION: Presently full length hinges are excluded from the NFPA 80 listing or document. Select products currently has fire ratings for it's full length hinges of 20 min, 60 min and 90 min. For wood or steel doors in dry wall or masonry up to and including 4 ft x 10 ft doors.
COMMITTEE ACTION: Accept in Principle.
Change the word "appropriate" to "labeled".
Change the sentence to read:
"Labeled full length continuous hinges are permitted in accordance their listing."
COMMITTEE STATEMENT: "Appropriate" is not the correct terminology. Language of proposed sentence is not consistent with NFPA Manual of Style. A labeled component will indicate that the hardware is compatible with the door assembly.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 24
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #5)

80- 21 - (2-8.1.4 [Now 2-4.3.1.4] (New)): Accept
SUBMITTER: Thomas R. Janicak, Steel Door Inst.
RECOMMENDATION: Add new text as follows:
2-8.1.4 When required to meet the clearances stated in 2-6.4 the shimming of hinges using steel shims shall be permitted.
SUBSTANTIATION: It is often necessary to fine tune the operating clearances of fire doors by using shims to properly position the door in the frame. This proposal would acknowledge a practice that currently exists and would require the use of a non-combustible steel shim.
COMMITTEE ACTION: Accept.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 24
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #CP8)

80- 22 - (2-8.2.2 [Now 2-4.4.2]): Accept
SUBMITTER: Technical Committee on Fire Doors and Windows
RECOMMENDATION: Delete the word "metal" in the third sentence.
SUBSTANTIATION: Other types of labels are commonly used for doors.
COMMITTEE ACTION: Accept.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 24
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #3)

80- 23 - (2-8.3 and A-2-8.3 [Now 2-4.5]): Accept in Principle in Part
SUBMITTER: Bernard E. Kinsock, Tucson Medical Center
RECOMMENDATION: Revise 2-8.3 as follows:
2-8.3 Protection Plates. The top of protection plates (kick plates) on rated fire doors shall be limited to 16 in. above the door bottom. If the fire door location and use requires protection plates greater than 16 in., consult those fire door manufacturers' listings that provide plates of greater sizes and other materials. Such plates shall be permitted on both door faces.
Delete A-2-8.3.

SUBSTANTIATION: This proposed change is the result of JCAHO certification review of hospitals with citations being issued for using protection plates greater than 16 in. on fire doors susceptible to damage from stretchers, gurney and housekeeping carts. Attempts by the American Hospital Association and Health Care Section of NFPA to alleviate this problem caused by 2-8.3 via Life Safety Code changes were confusing since efforts did not attack the basic cause - NFPA 80 and 2-8.3 therein. This proposal is submitted to provide a clear statement of the problem facing average lay persons involved.
COMMITTEE ACTION: Accept in Principle in Part.
Revise to read:
2-4.5 Protection Plates. Factory installed protection plates shall be installed in accordance with the listing of the door. Field installed protection plates shall be labeled and installed in accordance with their listing.
Exception: Labeling is not required where the top of the protection plate is not more than 16 inches above the bottom of the door.
Delete A-2-8.3. [Now A-2-4.5]
COMMITTEE STATEMENT: The revised language provides a clear statement of the intent of the committee consistent with the submitter's proposal.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 22
NEGATIVE: 2
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF NEGATIVE:
CAHANIN: The revision only serves to confuse the issue of > 16 in. protection plates on rated fire doors. Manufacturers of protection plates which are listed for specific doors will sell their listed/labeled plates to users who may then install them on doors which have not been tested with the protection plate in place. Language as revised appears to grant permission to overlook listing/labeling limits of doors.
KOFFEL: The proposed text will no longer require labels on factory installed protection plates. While laboratories indicated that such plates are not being labeled, there is no reasonable method to enforce this in the field. How can someone surveying a building be expected to verify whether the protection was factory installed or field installed and whether the factory installed plate is consistent with the door's listing? If protection plates are the problem that the Committee seems to feel they are, a more reliable and effective enforcement mechanism must be established.
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #CP13)

80- 24 - (2-8.5.2 [Now 2-4.1.2] Exception): Accept
SUBMITTER: Technical Committee on Fire Doors and Windows
RECOMMENDATION: Change the Exception to read:
"With approval by the authority having jurisdiction, where pairs of doors are provided for mechanical equipment rooms to allow the movement of equipment, the device shall be permitted to be omitted on the inactive leaf."
SUBSTANTIATION: Clarification of the intent of this Exception.
COMMITTEE ACTION: Accept.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 24
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #CP2)

80- 25 - (2-9.2 [Now 2-4.7.2]): Accept
SUBMITTER: Technical Committee on Fire Doors and Windows
RECOMMENDATION: Delete the sentences:
"Free use shall mean that the forces necessary to open any door fully by manual means in a means of egress shall not exceed 15 lbf (67 N) to release the latch, 30 lbf (133 N) to set the door in motion, and 15 lbf (67 N) to open the door to the minimum required width. These forces shall be applied at the latch stile to achieve the minimum required width."
SUBSTANTIATION: Referencing forces to open a door is inappropriate in this standard
COMMITTEE ACTION: Accept.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 23
NEGATIVE: 1
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF NEGATIVE:
CAHANIN: The "free use" sentence is not overly prescriptive. It was added in the 1995 edition of NFPA 80. NFPA 101 quotes this paragraph as a requirement for side swinging doors to 48 in. in width. This prescriptive requirement is no different than defining closing speed, clearances, or other operability requirements in the standard.
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #26)

80- 26 - (2-9.2 Exception (New)): Reject
SUBMITTER: Joseph N. Saino, Nat'l Assoc. of Arch Metal Mfg.
RECOMMENDATION: 2-9.2 Add an exception as follows:
"Power operated swinging doors shall be required to meet the opening force standards of ANSI A156.10."
SUBSTANTIATION: Power operated doors are allowed to have more opening force than manual doors.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: Requirements for force to open is inappropriate in this standard. Other documents such as NFPA 101 or the referenced ANSI document contain the criteria for opening force.
See Committee Proposal 80-25 (Log #CP2).
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 24
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #CP5)

80- 27 - (2-11.4 [Now 2-5.4]): Accept
SUBMITTER: Technical Committee on Fire Doors and Windows
RECOMMENDATION: Delete 2-11.4 and replace with the following:
~~2-11.4 Mounting to masonry walls shall be by means of through-bolts.~~
~~Exception: Where specified by this standard, steel shells shall be permitted to be used.~~
2-5.4 All mounting screws, bolts or shields shall be steel.
Exception: Where otherwise permitted by this standard.
2-5.5 Attachment to doors with composite cores shall provide firm anchorage for anticipated use.
SUBSTANTIATION: This section does not pertain to swinging doors.
COMMITTEE ACTION: Accept.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 24
ABSTENTION: 1
NOT RETURNED: 1 Meyer
EXPLANATION OF ABSTENTION:
DONOGHUE: Vote limited to elevator issues.

(Log #27)

80- 28 - (3-11.1.1.1 and 3-11.1.2): Reject
SUBMITTER: Joseph N. Saino, Nat'l Assoc. of Arch Metal Mfg.
RECOMMENDATION: 3-11.1.1 Add a second paragraph to read as follows:
"One fusible link shall be installed just above the opening and a second and third fusible link shall be installed at or near the ceiling on each side of the wall. (See Figures B-30 and B-32)."
Change 3-11.1.2 to read the same as 4-8.2 and 3-11.2 to read the same as the revised 4-8.3.
SUBSTANTIATION: To bring this section up to conform to other sections 4, 5, and 6.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The Committee feels that these sections sufficiently address the location of fusible links.
NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 26
VOTE ON COMMITTEE ACTION:
AFFIRMATIVE: 24
ABSTENTION: 1
NOT RETURNED: 1 Meyer

Public Input No. 28-NFPA 80-2022 [Section No. 19.1.1]

19.1.1*

This chapter covers the requirements of the installation, testing, and maintenance of fire dampers, ceiling radiation dampers, combination fire ~~and~~ - smoke dampers, and corridor dampers.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 26

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 26-NFPA 80-2022 [Section No. 3.3.37]	

Submitter Information Verification

Submitter Full Name: William Koffel
Organization: Koffel Associates, Inc.
Affiliation: AMCA International
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 10:32:55 EDT 2022
Committee: FDW-AAA

Public Input No. 29-NFPA 80-2022 [Section No. 19.1.3]

19.1.3

Combination fire- ~~and~~ - smoke dampers and corridor dampers shall also meet the requirements contained in NFPA 105.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 26.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 26-NFPA 80-2022 [Section No. 3.3.37]	

Submitter Information Verification

Submitter Full Name: William Koffel
Organization: Koffel Associates, Inc.
Affiliation: AMCA International
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City:
State:
Zip:
Submittal Date: Wed Jun 01 10:34:16 EDT 2022
Committee: FDW-AAA

Public Input No. 30-NFPA 80-2022 [Section No. 19.1.4.3]

19.1.4.3

Combination fire ~~and~~ - smoke dampers and corridor dampers shall be listed in accordance with UL 555, *Fire Dampers*, and UL 555S, *Smoke Dampers*.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 26.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 26-NFPA 80-2022 [Section No. 3.3.37]	

Submitter Information Verification

Submitter Full Name: William Koffel
Organization: Koffel Associates, Inc.
Affiliation: AMCA International
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 10:35:52 EDT 2022
Committee: FDW-AAA

Public Input No. 31-NFPA 80-2022 [Section No. 19.3.2]

19.3.2 Combination Fire ~~and~~ - Smoke Dampers.

After the installation of a dynamic combination fire ~~and~~ - smoke damper is complete, an operational test shall be conducted.

19.3.2.1

The test shall determine that the system has been installed and functions as intended.

19.3.2.2

The operational test shall be conducted under nonfire HVAC airflow conditions as well as static flow conditions.

19.3.2.3

The operational test shall verify that there are no obstructions to the operation of the dynamic combination fire ~~and~~ - smoke damper.

19.3.2.4

The operational test shall verify that there is full and unobstructed access to the dynamic combination fire ~~and~~ - smoke damper and all listed components.

19.3.2.5

All indicating devices shall be verified to work and report to the intended location.

19.3.2.6

The dynamic combination fire ~~and~~ - smoke damper shall also meet the testing requirements contained in Chapter 7 of NFPA 105.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 26.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 26-NFPA 80-2022 [Section No. 3.3.37]	

Submitter Information Verification

Submitter Full Name: William Koffel
Organization: Koffel Associates, Inc.
Affiliation: AMCA International
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 10:37:33 EDT 2022
Committee: FDW-AAA

Public Input No. 33-NFPA 80-2022 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required when documented as required in 19.5.3.1 and accepted by the AHJ for a single damper that is not accessible within a rated barrier or shaft.

Statement of Problem and Substantiation for Public Input

Determination by this NFPA TC of a “single” damper that can be omitted is problematic and should be left to the evaluation of the AHJ. It is unknown to this NFPA TC whether the “single” damper is one in a system of ten total dampers or one in a system of 100 total dampers. As stated in 1.2.3*, “It is not the purpose of this standard to establish the degree of protection required or to constitute the approval of any product.” Followed with A.1.2.3, “These are determined by the AHJ.”

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 36-NFPA 80-2022 [Section No. A.19.5.1.3]	
Public Input No. 36-NFPA 80-2022 [Section No. A.19.5.1.3]	

Submitter Information Verification

Submitter Full Name: Duane Smith
Organization: National Energy Management Ins
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 10:52:04 EDT 2022
Committee: FDW-AAA

Public Input No. 50-NFPA 80-2022 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

Additional Proposed Changes

File Name	Description	Approved
80_A2021_FDW_AAA_SD_PC_17_HeldComment.pdf	NFPA_80_PC_17	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as “Reject but Hold” in Public Comment No. 17 of the F2021 Second Draft Report for NFPA 80 and per the Regs. at 4.4.8.3.1.
This ensure proper inspection of all dampers related to fire life safety has been conducted on a periodic based thereby ensuring all life safety systems are operational.

Submitter Information Verification

Submitter Full Name: TC on FDW-AAA
Organization: NFPA
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 16:39:03 EDT 2022
Committee: FDW-AAA

Public Comment No. 17-NFPA 80-2020 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

Delete Section 19.5.1.3 completely as to permit non accessible testing of dampers first prevents adequate fire life safety for the occupants and second permits installation of fire damper to be placed entirely in non accessible areas for any and all fire dampers.

Statement of Problem and Substantiation for Public Comment

This ensure proper inspection of all dampers related to fire life safety has been conducted on a periodic based thereby ensuring all life safety systems are operational.

Related Item

• Revisions to NFPA 80 to prevent reduction of Life Safety Systems.

Submitter Information Verification

Submitter Full Name: Eli Howard
Organization: Sheet Metal & Air Conditioning
Affiliation: SMACNA
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 06 11:33:08 EDT 2020
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but held

Resolution: The public comment constitutes new material. The technical committee acknowledges the technical merit and safety implications of the issue and will consider processing a TIA to address this for concurrent issuance with the 2022 edition of NFPA 80 or between revision cycles.

Public Input No. 52-NFPA 80-2022 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

If a damper is not accessible for the purpose of testing, then the damper in not accessible for repairs and possibly a proper installation test if there is no coordination of trades. This is an issue since these devices do fail and will require repairs during the lifetime of the damper. It is my opinion that this would be used as an excuse to not determine a means to provide access for future service by mechanical and general contractors.

Additional Proposed Changes

File Name	Description	Approved
80_A2021_FDW_AAA_SD_PC_30_HeldComment.pdf	NFPA_80_PC_30	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as “Reject but Hold” in Public Comment No. 30 of the F2021 Second Draft Report for NFPA 80 and per the Regs. at 4.4.8.3.1.
If dampers are permitted to be installed inaccessible, there are going to be future issues performing testing and repairs.

Submitter Information Verification

Submitter Full Name: TC on FDW-AAA
Organization: NFPA
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 16:44:35 EDT 2022
Committee: FDW-AAA

Public Comment No. 30-NFPA 80-2020 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

If a damper is not accessible for the purpose of testing, then the damper in not accessible for repairs and possibly a proper installation test if there is no coordination of trades. This is an issue since these devices do fail and will require repairs during the lifetime of the damper. It is my opinion that this would be used as an excuse to not determine a means to provide access for future service by mechanical and general contractors.

Statement of Problem and Substantiation for Public Comment

If dampers are permitted to be installed inaccessible, there are going to be future issues performing testing and repairs.

Related Item

• CI-29-NFPA 80-2019

Submitter Information Verification

Submitter Full Name: bryan nunley
Organization: SCI
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 06 12:33:39 EDT 2020
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but held

Resolution: The public comment constitutes new material. The technical committee acknowledges the technical merit and safety implications of the issue and will consider processing a TIA to address this for concurrent issuance with the 2022 edition of NFPA 80 or between revision cycles.

Public Input No. 55-NFPA 80-2022 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

A damper that is not accessible for testing, then the damper is not accessible for repairs and possibly a proper installation test if there are no coordination of trades. This is a posible issue since these devices will fail at some point during the life span and will require repairs. I feel this would be used as an excuse to not determine a means to provide access for future service by mechanical and general contractors.

Additional Proposed Changes

File Name	Description	Approved
80_A2021_FDW_AAA_SD_PC_43_HeldComment.pdf	NFPA_80_PC_43	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as “Reject but Hold” in Public Comment No. __ of the F2021 Second Draft Report for NFPA 80 and per the Regs. at 4.4.8.3.1.
If access to the dampers remains required, then all future testing and repairs can take place.

Submitter Information Verification

Submitter Full Name: TC on FDW-AAA
Organization: NFPA
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 16:54:30 EDT 2022
Committee: FDW-AAA

Public Comment No. 43-NFPA 80-2020 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

A damper that is not accessible for testing, then the damper is not accessible for repairs and possibly a proper installation test if there are no coordination of trades. This is a posible issue since these devices will fail at some point during the life span and will require repairs. I feel this would be used as an excuse to not determine a means to provide access for future service by mechanical and general contractors.

Statement of Problem and Substantiation for Public Comment

If access to the dampers remains required, then all future testing and repairs can take place.

Related Item

• CI-29-NFPA 80-2019

Submitter Information Verification

Submitter Full Name: Edward Shelton
Organization: Gowan Inc
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 06 15:04:38 EDT 2020
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but held

Resolution: The public comment constitutes new material. The technical committee acknowledges the technical merit and safety implications of the issue and will consider processing a TIA to address this for concurrent issuance with the 2022 edition of NFPA 80 or between revision cycles.

Public Input No. 56-NFPA 80-2022 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

All dampers should be accessibe for inspection and maintenance. If an inaccessible damper is installed without forethought, the damper may not be reached for repairs. It is inevitable the

dampers will require maintenance or repairs. If these dampers are unreachable during an emergency, a problem will arise.

Additional Proposed Changes

File Name	Description	Approved
80_A2021_FDW_AAA_SD_PC_44_HeldComment.pdf	NFPA_80_PC_44	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as “Reject but Hold” in Public Comment No. 44 of the F2021 Second Draft Report for NFPA 80 and per the Regs. at 4.4.8.3.1.
If access to the damper is to be remained as REQUIRED, then all testing and repairs can be done as needed.

Submitter Information Verification

Submitter Full Name: TC on FDW-AAA
Organization: NFPA
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 16:57:01 EDT 2022
Committee: FDW-AAA

Public Comment No. 44-NFPA 80-2020 [Section No. 19.5.1.3]

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

All dampers should be accessibe for inspection and maintenance. If an inaccessible damper is installed without forethought, the damper may not be reached for repairs. It is inevitable the dampers will require maintenance or repairs. If these dampers are unreachable during an emergency, a problem will arise.

Statement of Problem and Substantiation for Public Comment

If access to the damper is to be remained as REQUIRED, then all testing and repairs can be done as needed.

Related Item

• CI-29-NFPA 80-2019

Submitter Information Verification

Submitter Full Name: Marcus Hernandesz
Organization: [Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 06 15:04:43 EDT 2020
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but held

Resolution: The public comment constitutes new material. The technical committee acknowledges the technical merit and safety implications of the issue and will consider processing a TIA to address this for concurrent issuance with the 2022 edition of NFPA 80 or between revision cycles.

Public Input No. 53-NFPA 80-2022 [New Section after 19.5.1.4]

Exclusion of Single Damper

Please re-consider the following:

19.5.1.3 In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

Similar language in NFPA 80 7.6.2.3 should also be reconsidered.

Why allow for a life safety device to not be checked for operation? What prescience is there for not verifying operation of a life safety device because it is not accessible? If the life safety

device is not important, than why is it required? All FLS dampers should be verified for operation.

Additional Proposed Changes

File Name	Description	Approved
80_A2021_FDW_AAA_SD_PC_39_HeldComment.pdf	NFPA_80_PC_39	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as “Reject but Hold” in Public Comment No. 39 of the F2021 Second Draft Report for NFPA 80 and per the Regs. at 4.4.8.3.1.
Not checking a single damper because it is not accessible will result in a possibility of a life safety device not functioning when needed and endangering building patrons.

Submitter Information Verification

Submitter Full Name: TC on FDW-AAA
Organization: NFPA
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 16:48:12 EDT 2022
Committee: FDW-AAA

Public Comment No. 39-NFPA 80-2020 [New Section after 19.5.1.3]

Exclusion of Single Damper

Please re-consider the following:

19.5.1.3 In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

Similar language in NFPA 80 7.6.2.3 should also be reconsidered.

Why allow for a life safety device to not be checked for operation? What prescience is there for not verifying operation of a life safety device because it is not accessible? If the life safety device is not important, than why is it required?

All FLS dampers should be verified for operation.

Statement of Problem and Substantiation for Public Comment

Not checking a single damper because it is not accessible will result in a possibility of a life safety device not functioning when needed and endangering building patrons.

Related Public Comments for This Document

Related Comment	Relationship
Public Comment No. 38-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]	

Related Item

• CI-29-NFPA 80-2019

Submitter Information Verification

Submitter Full Name: Christopher Ruch
Organization: NEMI
Affiliation: NEMI
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 06 14:25:19 EDT 2020
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but held

Resolution: The public comment constitutes new material. The technical committee acknowledges the technical merit and safety implications of the issue and will consider processing a TIA to address this for concurrent issuance with the 2022 edition of NFPA 80 or between revision cycles.

Public Input No. 51-NFPA 80-2022 [Section No. 19.5.3.2]

19.5.3.2

All documentation shall be maintained for at least three test cycles and made available for review by the AHJ. At least one of the tests on record shall be a visual test as required in 19.5.2.3.2

Statement of Problem and Substantiation for Public Input

The concern is with allowing the remote test method to be used indefinitely after the initial visual inspection. Mechanical devices, such as blade position switches can sometimes indicate that a damper is fully closed when it is not – there are instances where a wire/cable has been installed through the damper which does not allow for it to close fully but enough for the switch to indicate full closure. For this reason, a visual test should be required at regular intervals. A visual inspection can provide valuable information about the overall condition of the environment in which the damper operates, not just the position of the blades.

Submitter Information Verification

Submitter Full Name: Duane Smith
Organization: National Energy Management Ins
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 16:41:02 EDT 2022
Committee: FDW-AAA

Public Input No. 32-NFPA 80-2022 [Section No. 19.6.6]

19.6.6

Maintenance of combination fire ~~and~~ - smoke dampers and corridor dampers shall also meet the maintenance requirements in Chapter 7 of NFPA 105.

Statement of Problem and Substantiation for Public Input

Consistent with Public Input 26.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 26-NFPA 80-2022 [Section No. 3.3.37]	

Submitter Information Verification

Submitter Full Name: William Koffel
Organization: Koffel Associates, Inc.
Affiliation: AMCA International
Street Address:
City:
State:
Zip:
Submittal Date: Wed Jun 01 10:40:35 EDT 2022
Committee: FDW-AAA

Public Input No. 19-NFPA 80-2022 [Section No. 20.1.5.3]

20.1.5.3 Fire Safety Curtain.

A curtain composed of ~~fire-resistant fabric~~ fabrics that exhibit a one hour fire resistance rating, when tested in accordance with ASTM E119 or UL 263, and noncombustible framing materials. *(See 3.3.63.)*

20.1.5.3.1 Brail Fire Safety Curtain.

A fire safety curtain that folds up and stores in the space above a proscenium opening. *(See 3.3.63.1.)*

20.1.5.3.2 Straight-Lift Fire Safety Curtain.

A fire safety curtain consisting of one or more flat panel(s) that lifts up and stores above the proscenium opening. *(See 3.3.63.2.)*

20.1.5.3.3 Unframed Fire Safety Curtain.

A straight lift fire safety curtain containing no internal vertical framing members. *(See 3.3.63.3.)*

Statement of Problem and Substantiation for Public Input

The committee has not described what it considers a fire resistant fabric. Looking at the annex material associated with section 20.2.1.5 (which discusses flame-resistant thread) it would appear that it means a fabric that exhibits a fire resistance rating. For that reason, the PI interprets the term "fire resistant fabric" as a fabric that exhibits a 1 hour fire resistance rating.
The committee might want to look at revising 3.3.63 also.
A.20.2.1.5
Flame-resistant thread is constructed of fiberglass, or equivalent materials that have a fire rating equal to the fire safety curtain material. Currently, flame-resistant thread is not tested; rather, the ASTM E119, Standard Test Methods for Fire Tests of Building Construction and Materials, or UL 263, Fire Tests of Building Construction and Materials, testing of the curtain fabric with stitching validates flame resistance of the thread.

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler
Organization: GBH International
Street Address:
City:
State:
Zip:
Submittal Date: Sat May 28 16:08:46 EDT 2022
Committee: FDW-AAA

Public Input No. 18-NFPA 80-2022 [Section No. 20.2.1.13]

20.2.1.13

Fire safety curtain fabrics shall be tested in accordance with Test Method 2 of NFPA 701 and comply with the associated requirements .

Statement of Problem and Substantiation for Public Input

Simply stating that the fabric must be tested is insufficient because if can simply be tested and fail the requirements.

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler
Organization: GBH International
Street Address:
City:
State:
Zip:
Submittal Date: Sat May 28 16:03:19 EDT 2022
Committee: FDW-AAA

Public Input No. 10-NFPA 80-2022 [New Section after 20.7.3.4.1]

Manual Release Mechanisms Unobstructed

20.7.3.4.1

The manual release mechanisms shall be unobstructed at all times.

Statement of Problem and Substantiation for Public Input

There is currently not a requirement that the manual release mechanism to be unobstructed. There is a requirement for the controls for a Fire Safety Curtain to be unobstructed at all times. (20.6.10.2) The controls are not used during an emergency. The manual release mechanism is used during an emergency and having the release unobstructed should be a requirement so that individuals can find the release to use it.

Submitter Information Verification

Submitter Full Name: Daniel Culhane
Organization: Wenger Corporation
Affiliation: United States Institute for Theatre Technology (USITT)
Street Address:
City:
State:
Zip:
Submittal Date: Mon May 23 20:45:56 EDT 2022
Committee: FDW-AAA

Public Input No. 11-NFPA 80-2022 [Section No. 20.7.3.4.1]

20.7.3.4.~~1~~ – 2 .

Operations requiring cutting or severing a line shall not be permitted.

Statement of Problem and Substantiation for Public Input

Renumber the existing section 20.7.3.4.1 to allow for the new section 20.7.3.4.1.

Submitter Information Verification

Submitter Full Name: Daniel Culhane
Organization: Wenger Corporation
Affiliation: United State Institute for Theatre Technology (USITT)
Street Address:
City:
State:
Zip:
Submittal Date: Mon May 23 20:56:56 EDT 2022
Committee: FDW-AAA

Public Input No. 45-NFPA 80-2022 [Section No. 21.1]

21.1 General.

21.1.1*

This chapter shall cover the installation, inspection, testing, and maintenance of fire protective curtain assemblies installed to protect vertical or horizontal openings.

21.1.2*

Fire protective curtain assemblies shall be fire tested in accordance with UL 10D, *Fire Tests of Fire-Protective Curtain Assemblies*.

21.1.3

Fire protective curtain assemblies shall be identified by a label attached to the bottom bar of ~~the curtain~~ a verticle curtain or the side bar of a horizontal curtain so as to be visible for inspection . *(See 3.2.3)*.

A.21.1.1

Fire protective curtain assemblies are not to be confused with fabric fire safety curtain assemblies that are intended for use specifically on proscenium openings.

A.21.1.2

UL 10D, *Fire Tests of Fire-Protective Curtain Assemblies* , covers the evaluation of fire protective curtain assemblies intended to provide supplemental, passive fire protection as part of an engineered fire protection system. Fire protective curtain assemblies provide nonstructural separation only and are not intended to be substituted for structural hourly rated partitions or opening protectives that have been tested for fire endurance and hose stream performance. While products tested to UL 10D are exposed to a standard temperature time curve and the test is a positive pressure test, the test does not include a hose stream test nor does it provide criteria regarding temperature rise on the unexposed surface. Some curtain products might have been tested in accordance with UL 10B, *Fire Tests of Door Assemblies* , UL 10C, *Positive Pressure Fire Tests of Door Assemblies* , or NFPA 252 . . The AHJ should be consulted regarding their suitability for the application in which they are installed. When those products are fire rated for 20 minutes, they might not have been subjected to a hose stream test.

Statement of Problem and Substantiation for Public Input

This Public Input aligns the requirements in NFPA 80 for fire protective curtain assemblies with the scope of UL 10D, which covers the testing of both vertical and horizontal curtains.

The change to Section 21.1.3 clarifies the installation location for the required certification label on vertical and horizontal assemblies for consistence and ease of identification in the field (installation location).

Submitter Information Verification

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Submittal Date:	Wed Jun 01 14:09:22 EDT 2022
Committee:	FDW-AAA

Public Input No. 25-NFPA 80-2022 [Section No. 21.1.1]

21.1.1*

This chapter shall cover the installation, inspection, testing, and maintenance of fire protective curtain assemblies installed to protect vertical and horizontal openings.

Statement of Problem and Substantiation for Public Input

Several manufacturers provide horizontal fire protective curtain assemblies which are not covered by NFPA 80. A task group has been established to address this. This submission is a placeholder for that task group.

Submitter Information Verification

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Submittal Date: Tue May 31 17:03:55 EDT 2022
Committee: FDW-AAA

Public Input No. 20-NFPA 80-2022 [Section No. 21.7.3]

21.7.3

Acceptance testing shall include the closing of the fire protective curtain assembly by all means of activation and without power is so designed .

Statement of Problem and Substantiation for Public Input

Section 21.4 provides for fire protective curtain designs that close without power. In the industry, this feature is referred to as gravity-fail-safe. Adding it here helps prevent this mode of closing from being overlooked during the acceptance test.

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Committee: FDW-AAA

Public Input No. 21-NFPA 80-2022 [Section No. 21.7.5]

21.7.5

The following items shall be verified:

(1) Labels are clearly visible and legible.

(2) No open holes or breaks exist in surfaces of the curtain or in the stitching of the curtain.

(3) Curtain, guides, and coil are aligned, level, plumb, and true.

(4) Mounting and assembly bolts are intact and secured.

(5) Attachments to jambs are with bolts, expansion anchors, or as otherwise required by the listing and manufacturers' installation instructions .

(6) Smoke detectors, if equipped, are installed, operational, and in accordance with *NFPA 72*.

(7) No parts are missing or broken.

(8) Auxiliary hardware items that interfere or prohibit operation are not installed on the curtain or frame.

(9) No field modifications to the fire protective curtain assembly have been performed that void the label.

(10) Fire protective curtain assemblies have an average closing speed of not less than 6 in./sec (152 mm/sec) or more than 24 in./sec (610 mm/sec).

Statement of Problem and Substantiation for Public Input

Manufacturers' installation instructions generally provide more details than public listing documents and are consistent with the listing. This should improve the information for the acceptance testing.

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Committee: FDW-AAA

Public Input No. 46-NFPA 80-2022 [Section No. 21.7.6 [Excluding any Sub-Sections]]

Fire protective curtain assemblies shall be ~~drop-~~ operationally tested twice.

Statement of Problem and Substantiation for Public Input

This PI clarifies that this required test in UL 10D (Section 13) for fire curtains is referred to as an “operational” test. While it may be commonly referred to as a “drop-test”, the correct technical terminology that aligns with the test standards is “operational test”.

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Committee: FDW-AAA

Public Input No. 23-NFPA 80-2022 [New Section after 21.8.1]

21.8.x

Fire protective curtain assemblies equipped with automatic closing devices shall be listed and labeled to UL 864.

Statement of Problem and Substantiation for Public Input

NFPA 80 is not specific about which electrical standard controls the releasing devices for fire protective curtain assemblies equipped with power operators. To my knowledge, all of the US market manufacturers list their devices as UL864. UL864 is also referred to in UL 10D. This proposal is intended to provide clarity.

Submitter Information Verification

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Submittal Date: Tue May 31 16:50:02 EDT 2022
Committee: FDW-AAA

Public Input No. 22-NFPA 80-2022 [Section No. 21.8.1]

(Section 21.8.1 –

~~Fire protective curtain assemblies shall be inspected and tested to check for proper operation and full closure.~~

seems redundant to Section 21.7.3) Is 21.8.1 needed?)

Statement of Problem and Substantiation for Public Input

Section 21.7 addresses acceptance testing including the closing of the assembly. It seems confusing to have it called out again in 21.8.1 under the Closing Devices section.

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Committee: FDW-AAA

Public Input No. 24-NFPA 80-2022 [Section No. 21.10.2]

21.10.2

Any ~~breaks~~ holes, cuts, or tears in the ~~face covering of curtains shall~~ curtain shall be repaired in accordance with manufacturer's requirements without delay.

Statement of Problem and Substantiation for Public Input

As a manufacturer of fire protective curtain assemblies, it is not clear what "breaks in the face covering of curtains" is intended to mean. This is a confusing reference. In practice, holes and tears do occur which require repair in accordance with the manufacturers' instructions by a qualified person.

Submitter Information Verification

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Committee: FDW-AAA

Public Input No. 37-NFPA 80-2022 [Section No. A.6.4.1.4]

A.6.4.1.4

Adequate spring power is essential for hydraulic door closers to close a fire door with sufficient force to overcome the resistance of the latching mechanism. However, too much spring power causes opening resistance and makes it difficult for the handicapped, the infirm, and young children to open doors.

Closers are ~~classified~~ categorized in sizes from 2 to 6, with an increased closing force for higher numbers. Generally, a size 4 minimum closer should be used on exterior fire doors and a size 3 minimum closer should be used on interior fire doors. Door widths greater than 3⅛ ft (0.97 m) exterior and 3⅓ ft (1.02 m) interior, parallel or single lever arm applications, and abnormal air pressures usually require an increase to the next size. A combination of these factors could necessitate an increase of two sizes. Individual manufacturer recommendations should be consulted.

Spring hinges should be adjusted to achieve positive latching when allowed to close freely from an open position of 30 degrees. Where indicated in the individual certifications, products have additionally been investigated to UL 10C, "Positive Pressure Fire Tests of Door Assemblies.

Statement of Problem and Substantiation for Public Input

Some fire rated openings require certification to positive pressure requirements, which would include the door, frame, and associated hardware within the opening, including door closers. This addition is aimed to make reference to this supplemental marking that can exist on door closers. This is a current and past supplemental marking. Additionally, the editorial revision from “classified” to “categorized” is aimed to removed the word classified to potentially avoid confused with the Classification of products as it pertains to certification.

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Submittal Date: Wed Jun 01 11:02:41 EDT 2022
Committee: FDW-AAA

Public Input No. 36-NFPA 80-2022 [Section No. A.19.5.1.3]

A.19.5.1.3

In existing buildings it is recognized that some dampers might have become inaccessible for various reasons. Inaccessible dampers are those that have physical barriers or limitations where one cannot perform the required inspections or tests. ~~The inability to test a single damper might not pose a significant risk to the performance of the system when the system is fully ducted.~~

Statement of Problem and Substantiation for Public Input

The determination of risk to the performance of the system should be left to personnel with detailed information of a specific system. This NFPA TC does not have this information.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 33-NFPA 80-2022 [Section No. 19.5.1.3]	
Public Input No. 33-NFPA 80-2022 [Section No. 19.5.1.3]	

Submitter Information Verification

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Submittal Date: Wed Jun 01 10:59:54 EDT 2022
Committee: FDW-AAA

Public Input No. 42-NFPA 80-2022 [Section No. L.1.2.6]

L.1.2.6 UL Publications.

Underwriters Laboratories Inc., 333 Pfingsten Road, Northbrook, IL 60062-2096.

UL 9, *Fire Tests of Window Assemblies*, 2009, revised 2020.

UL 10B, *Fire Tests of Door Assemblies*, 2008, revised 2020.

UL 10C, *Positive Pressure Fire Tests of Door Assemblies*, ~~2016~~ 2021 .

UL 10D, *Fire Tests of Fire-Protective Curtain Assemblies*, 2017.

UL 263, *Fire Tests of Building Construction and Materials*, 2011, revised ~~2019~~ 2022 .

UL 752, *Bullet-Resisting Equipment*, 2005, revised ~~2015~~ 2021 .

Statement of Problem and Substantiation for Public Input

Update UL references to the latest editions.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 34-NFPA 80-2022 [Section No. 2.3.6]	

Submitter Information Verification

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Submittal Date: Wed Jun 01 11:16:42 EDT 2022
Committee: FDW-AAA

Task Group	Damper Inspection [NFPA 80]
Scope	Review the remote inspection requirements in NFPA 80 & 105 and if there is a need to add requirements for visual inspection. Review the exception for inspection for inaccessible dampers.
Recommendation	Create first revision
Substantiation	The changes to the annex are to provide additional guidance to the AHJ when determining when the inaccessible damper provision applies to periodic testing.

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

A.19.5.1.3

In existing buildings, it is recognized that ~~some~~ a limited amount of fire life safety dampers might have become inaccessible for various reasons. Inaccessible dampers are those that have physical barriers or limitations where one cannot perform the required inspections or tests. ~~The inability to test a single damper might not pose a significant risk to the performance of the system when the system is fully ducted.~~ The use of the term inaccessible is meant to convey that there is a significant physical or structural impediment(s) to complying with the code due to existing construction features, topography, or other existing constraints that would make testing the single damper technically infeasible. However, dampers that pose a significant risk to the performance of the system or the building occupants should not be omitted from periodic testing due to inaccessibility. Claiming a damper is inaccessible, without documentation that the inaccessible damper will not pose a significant risk to the performance of the system and technical justification for the designation, would not be justification for an AHJ to grant an exemption of a single damper. Maintenance should still be required per NFPA 80 Section 19.6.

Task Group	Damper Inspection [NFPA 80]
Scope	Review the remote inspection requirements in NFPA 80 & 105 and if there is a need to add requirements for visual inspection. Review the exception for inspection for inaccessible dampers.
Recommendation	Create first revision
Substantiation	The changes to test procedures were to clarify the existing requirements for remote testing.

19.5.2.3.3 Remote Inspection Method.

19.5.2.3.3.1 General.

(A) The remote inspection method shall be permitted for actuated dampers.

~~(A)~~(B) A damper with remote inspection capability shall positively indicate when the damper is fully open and fully closed.

~~(B)~~(C) The initial remote inspection shall include a visual inspection of the damper in accordance with 19.5.2.3.2.

~~(C)~~(D) The visual inspection shall confirm that the position indication method accurately reflects the full-open and full-closed position of the damper.

19.5.2.3.3.2 Test Procedure.

(A) A signal from the damper's position indication device shall confirm that the damper is in the full-open or full-closed position as required by the system design.

(B) The damper shall be commanded and confirmed to cycle from the normal operating position to the full-closed or full-open position.

(C) The damper shall be commanded and confirmed to the ~~original~~ normal operating position as required by the system design.

(D) If the remote inspection fails to comply with 19.5.2.3.3.2(A) through 19.5.2.3.3.2(C), a visual inspection shall be performed in accordance with 19.5.2.3.2.

Task Group	Damper Inspection [NFPA 105]
Scope	Review the remote inspection requirements in NFPA 80 & 105 and if there is a need to add requirements for visual inspection. Review the exception for inspection for inaccessible dampers.
Recommendation	Create first revision
Substantiation	The changes to the annex are to provide additional guidance to the AHJ when determining when the inaccessible damper provision applies to periodic testing.

7.5.2.2.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

A.7.5.2.2.3

In existing buildings, it is recognized that ~~some~~ fire life safety dampers might have become inaccessible for various reasons. Inaccessible dampers are those that have physical barriers or limitations where one cannot perform the required inspections or tests. ~~The inability to test a single damper might not pose a significant risk to the performance of the system where the system is fully ducted.~~ The use of the term inaccessible is meant to convey that there is a significant physical or structural impediment(s) to complying with the code due to existing construction features, topography, or other existing constraints that would make testing the single damper technically infeasible. However, dampers that pose a significant risk to the performance of the system or the building occupants should not be omitted from periodic testing due to inaccessibility. Claiming a damper is inaccessible, without documentation that the inaccessible damper will not pose a significant risk to the performance of the system and technical justification for the designation, would not be justification for an AHJ to grant an exemption of a single damper. Maintenance should still be required per NFPA 80 Section 19.6.

Task Group	Damper Inspection [NFPA 105]
Scope	Review the remote inspection requirements in NFPA 80 & 105 and if there is a need to add requirements for visual inspection. Review the exception for inspection for inaccessible dampers.
Recommendation	Create first revision
Substantiation	The changes to test procedures were to clarify the existing requirements for remote testing. Changes to 7.5.2.3.3.2 were to correlate with a similar requirement in NFPA 80.

7.5.2.3.3 Remote Inspection Method.

7.5.2.3.3.1 General.

(A) Remote inspection method shall be permitted for actuated dampers.
(B) A damper with remote inspection capability shall positively indicate when the damper is fully open and fully closed.
(C) The initial remote inspection shall include a visual inspection of the damper in accordance with 7.5.2.3.2.
(D) The visual inspection shall confirm that the position indication method accurately reflects the full-open and full-closed position of the damper.

7.5.2.3.3.2 Test Procedure.

(A) A signal from the damper's position indication device shall confirm that the damper is in ~~T~~the full-open or full-closed position~~,~~ as required by the system design~~, shall be confirmed via the damper's position indication device.~~
(B) The damper shall be commanded and confirmed to cycle from the normal operating position to the full-closed or full-open position.
(C) The damper shall be commanded and confirmed to be in the ~~original~~ normal operating position as required by the system design.
(D) If the remote inspection fails to comply with the requirements of 7.5.2.3.3.2(A) through 7.5.2.3.3.2(C), a visual inspection shall be performed in accordance with 7.5.2.3.2.

Task Group	Task Group on Chapter 4 [NFPA 80] In-Scope
Scope	Review the requirements in NFPA 80 Chapter 4 to determine if they are applicable to only certain types of opening protectives. Requirements specific to one or only a few types of opening protective should be relocated to specific chapter, requirements applicable to multiples of opening protectives can remain in chapter 4, but ensure requirements are clear on types of openings to which the requirements are or are not applicable.
Recommendation	If language dealt with more than one product chapter we tried to leave in Chapter 4. If only one product, we tried to move to that product chapter. We need clarification language added to Chapter 4 that was an overview of what Chapter 4 covered and what it did not. Proposed actions and substantiations for each item are shown in the table below.

#	Motion	Recommendation	Substantiation
1	Create first revision	**4.1 General ~~Limitations~~.** **4.1.1** This chapter shall cover the installation of new fire doors and fire windows. **4.1.2** This chapter shall not cover the installation of glass block assemblies, dampers, fabric fire safety curtains, or fire protective curtain assemblies. **4.1.3** The installation of fire doors and fire windows shall also comply with Chapter 6 through Chapter 17, as applicable.	Making 4.1 just “General” was in alignment with other chapters. Chapter 4 needed clarifying language similar to other chapters.
2	Create first revision	~~**4.1.4 Sliding Doors.**~~ ~~**4.1.4.1**~~ ~~Sliding doors shall be permitted to have integral swinging doors.~~ ~~**4.1.4.2**~~ ~~Where sliding doors include an integral~~	This application (sans “exterior”, is noted in. 8.1.3.6. Egress issue not relevant to fire doors. This appears to be an egress issue and is already covered in another citation making this redundant.

#	Motion	Recommendation	Substantiation
3	Create first revision	[Move 4.2.1.5 to 17.1.3.2, move text from 17.1.3 to 17.1.3.1 and reassociate annex with new 17.1.3.1.] **4.2.1.5** **[17.1.3.2]** At a minimum, the label for fire window frames shall contain the following information: (1) The words “fire window frame” (2) The manufacturer’s company name or a code that can be traced back to the manufacturer (3) The marking of a third-party certification agency (4) The fire protection rating (5) The fire test standard designation to which it was tested	Citation is specific to only one product chapter. 17.1.2.2. and 4.2.1.5 belong together

4	Create first revision	~~**4.3 Classifications and Types of Doors.**~~ ~~**4.3.1***~~ ~~Only labeled fire doors shall be used.~~ **A.4.3.1** **[A.4.2.1]** Doors are of several classifications, types, and methods of operation. Fire door assemblies consist of individually labeled components that are essential to the satisfactory performance of the complete assembly. Some labels cover one or more components in addition to the door. *(For specific information, see ~~4.3.2~~6.1.4.1 and Annex D.)* **6.1.4 Labeled Assemblies.** **[Add new header]** **4.3.2** **[6.1.4.1]** Swinging fire doors shall be permitted to be furnished separately from labeled door frames and builders hardware if the complete fire door assembly, including the door, frame, and builders hardware, comprises a labeled fire door assembly. **4.3.3** **[6.1.4.2]** Fire doors furnished with or prepared for fire exit hardware shall bear a label stating “Fire Door to Be Equipped with Fire Exit Hardware.” **4.3.4** **[6.1.4.3]** The label described in 4.3.3 shall address the reinforcements necessary for the fire exit hardware, and the complete fire door assembly shall have been tested for egress panic load requirements. **4.3.5*** **Labeled Assemblies.** **[11.1.4]** Rolling steel fire doors shall be labeled and shall be furnished as a complete assembly that includes curtain, bottom bar, barrel, guides, brackets, hood, automatic closing device, vision lights, and any other components required by their listing for a complete assembly. ~~**4.3.6**~~ ~~Elevator doors shall be in accordance with Section 14.2.~~	Section 4.3 heading is deleted as it is unnecessary due to the relocation of the requirements in this section. Section 4.3.1 was deleted as it is redundant with 4.2.1. Section 4.3.2 through 4.3.5, 4.3.7, and 4.3.8 were relocated as they are applicable to a single product and should be in the product-specific chapter. Section 4.3.6 was deleted as it did not add value to Chapter 14. Section 4.3.9 was renumbered due to the deletion of all the other requirements under 4.3.

#	Motion	Recommendation	Substantiation
		4.3.7 Assemblies. [16.1.3] Access-type door assemblies shall consist of single swinging steel doors with frames, self-latching devices, and closing mechanisms. **4.3.8 [13.1.2.2, move text in 13.1.2 to 13.1.2.1 and make 13.1.2 a standalone header]** Service counter fire doors shall be of the single- or two-speed counterbalanced types of flush design or the rolling steel type of formed steel and shall include wall guides, frame, sill, latching, and counterbalancing mechanism. **4.3~~.9~~* Oversized Doors.**	
5	Create first revision	**A.4.7.4.3 [A.4.7.4.3.1]** Wall sleeves required for the installation of fire door fusible links on both sides of a wall are unlike many other wall penetrations for pipes, conduits, ducts, and the like. Such sleeves must remain open and unobstructed for free movement of the fusible link cable/chain upon fusing of the links. Firestopping, other sealants, or other materials should not be used on sleeves because they can encumber movement and prevent automatic closing of a fire door in a fire event. It is important that cables, chains, or any components of the fusible link assembly do not hang up on eye bolts or pulleys, through-wall sleeve, any part of the building structure, or any component of the fire door assembly. It is also important that components not be coated or affixed with foreign material which could obstruct free operation of the release system. Examples of foreign material might include fireproofing, firestopping, paint, or spray texturing.	This annex section relates to the material in A.4.7.4.3.1.
6	Create first revision.	~~**4.7.4.4**~~ ~~Fusible links shall be used when the system or arrangement of detectors for an opening is not considered to be fail-safe.~~	This section is redundant with 4.7.1.3.
7	Create first revision	~~**4.8.1.6**~~ ~~Door assemblies shall be used on walls of other construction only if listed for such installation.~~	Redundant with 4.8.1.3.

#	Motion	Recommendation	Substantiation
8	Create first revisions	**4.8.4 Clearance.** Where required by Chapters 6 through 16, clearance under doors shall comply with 4.8.4. **6.3.1.7.6** Clearance under doors shall comply with 4.8.4. **9.3* Clearances ~~Around Openings~~.** **9.3.1*** Clearances at the lintel, jambs, and meeting stiles shall not exceed 1⁄8 in. (3.18 mm). **9.3.2** Clearance under doors shall comply with 4.8.4.	Point back to 4.8.4 for door types that need the guidance and nothing specific for bottom clearance in product chapter. Changed header in 9.3 to be consistent with headers used for clearances in other chapters.

Task Group	Task Group on Chapter 4 [NFPA 80] – Technical Changes
Scope	Review the requirements in NFPA 80 Chapter 4 to determine if they are applicable to only certain types of opening protectives. Requirements specific to one or only a few types of opening proctive should be relocated to specific chapter, requirements applicable to multiples of opening protectives can remain in chapter 4, but ensure requirements are clear on types of openings to which the requirements are or are not applicable.
Recommendation	The following proposed technical changes are outside the scope of the Chapter 4 task group. However, these items were flagged by the task group as potentially needing additional review by the technical committee. Proposed actions and substantiations for each item are shown in the table below.

#	Motion	Recommendation	Substantiation
1	Create first revision	**4.1.1 Classification.** Fire doors and fire windows shall be classified by designating a required fire protection rating expressed in minutes, hours, or fractions thereof. *(See Annex D.)*	Some door label ratings are expressed in minutes (I.e. wood doors) and others are expressed in hours or fraction thereof. This more accurately describes what one may see in the field.
2	Create first revision	**4.1.3.2.1** Signs shall be attached to fire doors by use of an adhesive, unless otherwise permitted by 4.1.3.2.3.	4.1.3.2.1 implies that only adhesive can be used to attach signage, thereby conflicting with 4.1.3.2.2. & 4.1.3.2.3, which allows for mechanical attachment. Adding this to 4.1.3.2.1 brings all three statements in sync.
3	Create first revision	**4.2.1.4*** The label for fire door frames shall contain the following information: (1) The words “fire door frame” or the acronym “FDF” (2) The manufacturer’s company name or a code that can be traced back to the manufacturer (3) The marking of a third-party certification agency ~~(4) The fire protection rating of the frame~~ (5) The fire test standard designation to which it was tested **A.4.2.1.4** Some fire door frame labels may indicate a fire protection rating for the frame.	Many fire rated frames have embossments that are equivalent to a physical label and only have the “FDF” marking as required by their listing procedures. Adding FDF more accurately reflects what one might see in the field. Many frames are embossed and do not bear the fire rating of the frame. In addition, almost all the frame labels in the field and on the market do not reflect a fire protection rating.

#	Motion	Recommendation	Substantiation
4	Create first revision	**4.6.3.3*** Fire exit hardware shall consist of exit devices that have been ~~labeled~~ listed for both fire and panic protection.	Whereas all fire exit hardware has been tested and is listed for both panic and fire protection, it does not bear an actual label for both panic and fire protection. The exit devices bear either a panic or fire exit hardware label. This change will help reduce confusion for AHJ's looking for both labels on an exit device.
5	Create first revision	**4.7 Actuation Devices for Fire Doors~~, Fire Shutters,~~ and Fire Windows.**	This is redundant because a Fire Shutter is defined as a type of a fire door and the document already specifies fire doors in general and does not break out all other types. (such as swinging, sliding, rolling, etc.). See definition of fire shutter.
6	Create first revision	**4.8.4.1*** Clearance under the bottom of a door shall be a maximum of **~~3/~~4** in. (19 mm), unless otherwise permitted by its listing.	Some types of door may permit larger than ¾ in clearance under the door, for example accordion doors.

Task Group	Editorial [NFPA 80]
Scope	Review editorial comments prepared by NFPA staff for NFPA 80.
Recommendation	Create first revisions for each chapter
Substantiation	The changes are editorial revisions to the code to comply with the NFPA Manual of Style and to increase usability and consistency through the document. Where these changes conflict with another first revision, the content of the other first revision should take precedence.

#	Proposed Change	Editorial Note	Task Group Notes
1	**4.2.2*** New fire protection–rated and fire resistance–rated glazing shall be permanently marked in accordance with Table 4.2.2~~, and such marking shall be permanently affixed~~.	NFPA MOS does not permit multiple requirements within a single section.	
2	**4.3.5*** Rolling steel fire doors ~~shall be labeled and~~ shall be furnished as a complete assembly that includes curtain, bottom bar, barrel, guides, brackets, hood, automatic closing device, vision lights, and any other components required by their listing for a complete assembly.	NFPA MOS does not permit multiple requirements within a single section.	Labels are already required by 4.3.1.
3	**4.3.8** Service counter doors shall be of the single- or two-speed counterbalanced types of flush design or the rolling steel type of formed steel.~~ and~~ **4.3.9** Service counter doors shall include wall guides, frame, sill, latching, and counterbalancing mechanism.	NFPA MOS does not permit multiple requirements within a single section.	
4	**4.3.9* Oversized Doors.** **4.3.9.1** Fire doors that are too large to be fire tested shall be considered oversized fire doors.~~ and shall bear a label by an approved agency or~~ **4.3.9.2** Oversized fire doors shall not be required to be labeled where ~~be~~ provided with a certificate of inspection furnished by an approved testing agency. **4.3.9.~~2~~ 3** When a certificate of inspection is provided by an approved testing agency, the certificate shall state that the door conforms to the requirements of design, materials, and construction but has not been subjected to the fire test.	NFPA MOS does not permit multiple requirements within a single section.	Fire doors are required to be labeled by 4.3.1.
5	**4.4.3* Glazing Materials in Visions Panels.** **4.4.3.1.** Glazing materials in vision panels shall be installed in labeled glass light kits or in accordance with the fire door listing.~~ and~~ **4.4.3.2** Glazing materials shall be installed in accordance with the manufacturer's installation instructions. **4.4.3.~~1~~3*** For new wood doors, glazing materials in vision panels shall be installed in labeled glass light kits or in accordance with the fire door listing.~~ and~~ **4.4.3.4*** For new wood doors, glazing materials shall be installed in accordance with inspection service procedure and under label service.	NFPA MOS does not permit multiple requirements within a single section. Added header to comply with MOS.	Reassociate A.4.4.3.1 to 4.4.3.4.

#	Proposed Change	Editorial Note	Task Group Notes
6	**4.4.5*** Glazing material shall be permitted in fire doors having the fire protection ratings shown in Table 4.4.5 when tested in accordance with NFPA 252, ANSI/UL 10B, Standard for Fire Tests of Fire Door Assemblies, or ANSI/UL 10C, Standard for Positive Pressure Fire Tests of Door Assemblies.~~, and~~ **4.4.5.1** Maximum ~~shall be limited in size and~~ area shall be in accordance with Table 4.4.5. **4.4.5.~~1~~ 2** Maximum area of individual exposed lights shall be 1296 in.^{2} (0.84 m^2) with no dimension exceeding 54 in. (1.37 m) unless otherwise tested.	NFPA MOS does not permit multiple requirements within a single section.	
7	**4.6.~~2.1~~3** Fire exit hardware shall be within the category of builders hardware.	NFPA MOS does not permit single subsections.	
8	**4.7.1.5*** ~~When a~~Actuation devices ~~are~~ used in conjunction with material handling systems, such as a conveyor, ~~they~~ shall be arranged to do all of~~in accordance with~~ the following: (1) ~~They shall s~~Stop the feed conveyor or otherwise initiate the mechanism that clears the path of the fire door. (2) ~~They shall p~~Provide an adequate time delay to clear the opening, not ~~that shall not~~ exceeding 10 seconds. (3) ~~They shall a~~Activate the automatic- or self-closing mechanism.	NFPA MOS does not permit multiple requirements within a single section.	
9	**4.7.3.1** ~~All h~~Heat detectors shall be placed as shown in Figure 4.7.3.1(a) and Figure 4.7.3.1(b).~~, but in no event~~ **4.7.3.2** Heat detectors shall not ~~detectors~~ be placed in the dead air space shown in Figure 4.7.3.1(a).	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
10	**4.7.4.3*** Where ~~fusible links are~~ used, fusible links shall be installed in accordance with 4.7.4.3.1 through 4.7.4.3.3. **4.7.4.3.1** ~~one f~~Fusible links shall be located near the top of the opening on each side of the wall.~~, and~~ **4.7.4.3.2** ~~additional~~ Fusible links shall be located at or near the ceiling on each side of the wall. **4.7.4.3.3*1** ~~Where fusible links are installed on both sides of the wall, a~~A sleeve shall be installed through the wall to provide an open pathway for the cable or chain connecting the fusible links. **4.7.4.3.2 3.1** The sleeve shall be 1⁄2 in. (13 mm) diameter galvanized steel conduit or pipe, with ends deburred.~~, and~~ **4.7.4.3.3.2** The sleeve shall be fitted with a collar or bushing at each end to secure the sleeve around the wall.~~ and~~ **4.7.4.3.3.3** The sleeve shall allow free movement of the cable or chain through the sleeve upon fusing of the links.	NFPA MOS does not permit multiple requirements within a single section.	Reassociate A.4.7.4.3 to 4.7.4.3.3
11	**4.8.1.2** Walls shall be of brick, concrete, or concrete masonry unit construction. ~~except that,~~ **4.8.1.3** ~~w~~Where hollow concrete masonry units are used, all hollow cells within a minimum of 16 in. (406 mm) of the opening shall be filled with concrete.	NFPA MOS does not permit multiple requirements within a single section.	
12	**4.8.2.6*** Where frames have a ~~greater~~ jamb depth greater than 4 in. (102 mm), the sills ~~shall have a minimum width of 4 in. (102 mm) and~~ shall be installed so that the sill extends from the face of the frame on the door side into the frame.	NFPA MOS does not permit multiple requirements within a single section.	
13	**4.8.2.9*** For horizontally sliding fire doors and vertically sliding fire doors sills shall comply with 4.8.2.9.1 and 4.8.2.9.2.~~, sills shall be constructed of noncombustible material and~~ **4.8.2.9.1** Sills shall extend 6 in. (152 mm) past the edge of the opening on each side.~~ and~~ **4.8.2.9.2** Sills shall extend 4 in. (102 mm) out from the face of the wall.	NFPA MOS does not permit multiple requirements within a single section.	Redundant, sills are required to be noncombustible per 4.8.2.4.
14	**4.8.2.10 ~~Rolling Steel Fire Doors.~~** For rolling steel fire doors, sills shall comply with 4.8.2.10.1 and 4.8.2.10.2.~~be constructed of noncombustible material,~~ **4.8.2.10.1** Sills shall extend past each jamb as necessary to be completely under the guides.~~, and~~ **4.8.2.10.2** Sills shall extend out from the centerline of the guide groove a minimum of 4 in. (102 mm) on each side to accommodate deflection of the bottom bar.	NFPA MOS does not permit multiple requirements within a single section. If this section has a header, 4.8.2.1-13 need headers.	Redundant, sills are required to be noncombustible per 4.8.2.4.

#	Proposed Change	Editorial Note	Task Group Notes
15	**4.8.6*** Where permitted by the individual door assembly listing, expansion anchors used in concrete, brick, or filled concrete masonry unit walls shall ~~meet the following conditions:~~comply with 4.8.6.1 through 4.8.6.7. **4.8.6.1** Expansion anchors shall be manufactured from either zinc-coated or cadmium-coated steel ~~and shall be~~either ~~zinc-coated or cadmium-coated~~. **4.8.6.2** Expansion anchors shall conform to Federal Specification A-A-1923A, Shield Expansion (Lag, Machine and Externally Threaded Wedge); A-A-1924A, Shield, Expansion (Self Drilling Tubular Expansion Shell Bolt); or A-A-55614, Shield, Expansion (Non-Drilling Expansion Anchors). **4.8.6.3** The compressive strength of the concrete shall not be less than 2000 psi (13,790 kPa)~~.~~, ~~and~~ **4.8.6.4** ~~the~~ The bolt load shall not exceed 1⁄4 of the proof test load. **4.8.6.5** Where used in brick or filled concrete masonry unit walls, the bolt load shall not exceed 1⁄12 of the proof test load. **4.8.6.6** The distance from the edge of the wall to the center of an expansion anchor shall be at least six times the diameter of the anchor. **4.8.6.7** The distance between expansion anchors shall be at least eight times the diameter of the anchor.	NFPA MOS does not permit multiple requirements within a single section.	
16	**5.1.3 Replacement**. Where it is necessary to replace fire doors, shutters, windows or their frames, glazing materials, hardware, and closing mechanisms, replacements ~~shall meet the requirements for fire protection and~~ shall be installed and tested as required by this standard for new installations.	NFPA MOS does not permit multiple requirements within a single section.	
17	**5.2.3.5.3*** ~~**Inspection Mark.**~~ Upon completion of inspection, an inspection mark shall be permitted to be applied to the assembly.	Improper head.	
18	**5.2.4.5*** ~~Hardware shall be examined, and i~~Inoperative hardware, parts, or other defective items shall be replaced without delay.	NFPA MOS does not permit multiple requirements within a single section.	First part is removed as it is redundant with 5.2.3.
19	**5.5.1*** ~~Repairs shall be made, and d~~Defects that could interfere with operation shall be ~~corrected~~ repaired without delay.	NFPA MOS does not permit multiple requirements within a single section.	
20	**6.1.4.2.1** Self-closing doors shall swing easily and freely~~. and~~ **6.1.4.2.2** Self-closing doors shall be equipped with a closing device to cause the door to close and latch each time it is opened. **6.1.4.2.~~2~~ 3** The closing ~~mechanism~~ device shall not have a hold-open feature.	NFPA MOS does not permit multiple requirements within a single section.	Closing mechanism changed to closing device as this is a defined term.

#	Proposed Change	Editorial Note	Task Group Notes
21	**6.1.4.3 Automatic-Closing Doors.** **6.1.4.3.1** Automatic-closing doors shall be permitted to close automatically by means of the installation of a closing device and one of the following: (1) A separate, labeled, fail-safe door holder/release device or a hold-open mechanism that shall be permitted to be an integral part of the basic closing device (2) An integral closing device that allows the door to swing freely and that automatically closes the door during an alarm condition, provided the hold-open mechanisms are released by one or a combination of automatic fire detectors acceptable to the AHJ **6.1.4.3.~~1~~ 2** The fire door shall latch upon closure.	NFPA MOS does not permit single subsections.	
22	**6.3.1.3*** Door frames intended for drywall installation shall be of the flush butt–mounted or wrap-around type.~~, and~~ **6.3.1.4** ~~a~~Anchors for door frames complying with 6.3.1.3 shall be secured in accordance with the manufacturer's instructions.	NFPA MOS does not permit multiple requirements within a single section.	
23	**6.4.3.1.5.2** Spring hinges shall be labeled.~~ and~~ **6.4.3.1.5.3** Spring hinges shall meet the requirements of ANSI/BHMA A156.17, Standard for Self Closing Hinges & Pivots, Grade 1.	NFPA MOS does not permit multiple requirements within a single section.	
24	**6.4.3.1.8.2** Where only intermediate pivots are used on doors up to 60 in. (1.52 m) in height, two intermediate pivots shall be provided. ~~for door leaves up to 60 in. (1.52 m) in height, and~~ **6.4.3.1.8.3** Where only intermediate pivots are used on doors in excess of 60 in. (1.52 m) in height, an additional intermediate pivot shall be added for each additional 30 in. (0.76 m) of door height or fraction thereof.	NFPA MOS does not permit multiple requirements within a single section.	
25	**6.4.3.1.10** Continuous hinges shall be labeled.~~ and~~ **6.4.3.1.11** Continuous hinges shall meet the requirements of ANSI/BHMA A156.26, *Standard for Continuous Hinges*.	NFPA MOS does not permit multiple requirements within a single section.	
26	**6.4.3.2.3** Mortise hinges ~~shall be secured to~~on wood and plastic-covered composite doors or wood core doors shall comply with 6.4.3.2.3.1 and 6.4.3.2.3.2. **6.4.3.2.3.1** Hinges shall be secured with No. 12 × 1¼ in. (31.75 mm) flat, threaded-to-the- head, steel wood screws. **6.4.3.2.3.2** Pilot holes shall be drilled that are 5⁄32 in. (4 mm) in diameter.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
27	**6.4.4.5** ~~For p~~Locks and latches for pairs of doors ~~W~~where both leaves are required for exit purposes shall comply with 6.4.4.5.1 and 6.4.4.5.2.~~,~~ ~~they~~ **6.4.4.5.1** Both leaves shall be provided with labeled fire exit hardware, unless permitted by 6.4.4.~~5~~6. **6.4.4.5.~~1~~ 2** Where permitted by the AHJ, pairs of doors not provided with an astragal shall be permitted to have labeled fire exit hardware and an open back strike installed on the inactive leaf, and either labeled fire exit hardware or any labeled latch capable of being opened by one obvious operation from the egress side installed on the active leaf.	NFPA MOS does not permit single subsections.	
28	**6.4.4.6** Locks and latches ~~F~~for ~~Where a~~ pairs of doors ~~is~~ needed for the movement of equipment and where the inactive ~~leaf~~ leaves of the pairs of doors ~~is~~ are not required for exit purposes shall comply with 6.4.4.6.1 and 6.4.4.6.2.~~,~~ **6.4.4.6.1** ~~I~~Labeled, top and bottom, self-latching or automatic flush bolts, or labeled two-point latches shall be permitted. **6.4.4.6.~~1~~2*** Where permitted by the AHJ, Manually operated, labeled, top and bottom flush-mounted or surface-mounted bolts on the inactive leaf of a pair of doors shall be permitted ~~to be used where acceptable to the AHJ, provided they do not pose a hazard to safety to life~~.	NFPA MOS does not permit single subsections.	“Provided they do not pose a hazard to safety to life” seems redundant with the AHJ permission.
29	**6.4.4.8.1** Locks, latches, surface-mounted top and bottom bolts, and fire exit hardware shall be secured to reinforcements in the doors with machine screws or ~~shall be~~ attached with through-bolts. **6.4.4.8.2~~1.1~~** For lock and latch installations in accordance with 6.4.4.8.1, ~~P~~pilot holes shall be drilled ~~prior to lock and latch installation~~, in accordance with manufacturer's installation instructions.	NFPA MOS does not permit multiple requirements within a single section or single subsections.	
30	**6.4.4.8.3** Locks and latches shall be attached to wood and plastic-covered composite doors or wood core doors with not less than No. 8, flat, threaded-to-the-head wood screws or ~~shall be~~ attached with through-bolts.	NFPA MOS does not permit multiple requirements within a single section.	
31	**6.4.4.10** Strike plates for doors swinging in pairs shall be secured to reinforcements in the inactive leaf with machine screws. **6.4.4.1~~0.1~~** For strike plate installations in accordance with 6.4.4.10, ~~P~~pilot holes shall be drilled ~~prior to strike plate installation~~, in accordance with manufacturer's installation instructions.	NFPA MOS does not permit single subsections.	
32	**6.5.2 Manufacturers' Instructions.** **6.5.2.1** All components shall be installed in accordance with the manufacturers' installation instructions.~~ and~~ **6.5.2.~~1~~2** All components shall be adjusted to function as described in the listing.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
33	**7.1.3.3** Lap-mounted doors shall be hung on the surface of the wall. ~~and~~ **7.1.3.4** Lap-mounted doors shall lap the opening at least 4 in. (102 mm) at the top and on each side.	NFPA MOS does not permit multiple requirements within a single section.	
34	**7.2.4.4** The metal covering around the opening shall be secured with small nails spaced about 1 in. (25.4 mm) apart. ~~, and the~~ **7.2.4.5** ~~e~~Exposed wood shall be painted ~~thoroughly~~.	NFPA MOS does not permit multiple requirements within a single section.	
35	**8.2.1.2*** Walls shall be of brick, concrete, or concrete masonry construction. **8.2.1.3** ~~except that w~~Where tin-clad doors are used on hollow concrete masonry units, the wall opening shall be reinforced to provide anchorage for door-mounting hardware equal to that of brick or concrete.	NFPA MOS does not permit multiple requirements within a single section.	
36	**8.4.1 Closing Devices.** **8.4.1.1** Doors shall be equipped with self-closing or automatic-closing devices to ensure that they ~~shall~~ close or ~~be~~ are closed at the time of a fire. **8.4.1.~~1.~~2*** Closing devices shall be a system of weights or a listed closing device.	NFPA MOS does not permit multiple requirements within a single section and single subsections.	
37	**8.4.2.1.1** Power-operated doors not equipped with standby or emergency power shall be equipped with an integral or a separate listed releasing device that ~~shall~~ automatically disconnects the door from the control of the power operator at the time of a fire. **8.4.2.1.2** The releasing device shall be ~~activated~~ actuated at the time of the fire by detectors or fusible links installed on both sides of the wall and interconnected so that the operation of the single detector or fusible link ~~shall~~ will allow the door to be disconnected and closed.	NFPA MOS does not permit multiple requirements within a single section.	
38	**8.4.3.5.1*** At least two binders shall be required on the vertical jambs. ~~, and~~ **8.4.3.5.2*** ~~a~~At least one binder shall be required at the head unless otherwise listed. **A.8.4.3.5.1** See Figure A.4.6.4(f). ~~and~~ **A.8.4.3.5.2** See Figure A.4.6.4(g).	NFPA MOS does not permit multiple requirements within a single section.	Add new annex note A.8.4.3.5.2.
39	**8.4.3.7 Center Latch.** Where doors are power operated, center-parting doors requiring a center latch shall be provided with a fusible link arrangement that ~~shall~~ holds the latch in an unlatched position during day-to-day operation while causing the latch to operate and secure the door in the event of a fire.	NFPA MOS does not permit multiple requirements within a single section.	
40	**9.1.4.2** Doors shall lap the opening if mounted completely on the surface of the wall or ~~shall~~ extend across the opening if ceiling mounted or surface mounted.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
41	**9.1.4.3*** Single doors shall be affixed to a jamb at one wall and ~~shall~~ close against a strike jamb provided at the other wall in accordance with the individual manufacturers' published listings. **9.1.4.4** Biparting doors shall each be affixed to a jamb at a wall and ~~shall~~ close together at the meeting stiles in accordance with the individual manufacturers' published listings.	NFPA MOS does not permit multiple requirements within a single section.	
42	**9.4.1.2** Doors shall be self-closing or automatic-closing.~~ and~~ **9.4.1.3** Closing devices shall not have a delay in the initiation of closing or reclosing of more than 10 seconds.	NFPA MOS does not permit multiple requirements within a single section.	
43	**10.2.4.2** Doors up to 6 ft (1.83 m) wide shall be provided with three vents.~~, and~~ **10.2.4.3** ~~d~~Doors over 6 ft (1.83 m) wide shall be provided with four vents.	NFPA MOS does not permit multiple requirements within a single section.	
44	**10.2.4.4** The metal covering around the opening shall be secured with small nails spaced about 1 in. (25.4 mm) apart.~~, and the~~ **10.2.4.5** ~~e~~Exposed wood shall be painted.	NFPA MOS does not permit multiple requirements within a single section.	
45	**10.4.1.2** Vertically sliding sectional doors shall close automatically upon operation of a fusible link or detector that releases the overhead sectional door.~~, and the~~ **10.4.1.3** A governor shall control the rate of descent for vertically sliding sectional doors.	NFPA MOS does not permit multiple requirements within a single section.	
46	**10.4.3.1.4.2** Cable brackets shall be required.~~ and~~ **10.4.3.1.4.3** Cable brackets shall be bolted through the door.	NFPA MOS does not permit multiple requirements within a single section.	
47	**10.4.3.2.2 Track.** **10.4.3.2.2.1** The horizontal track section shall extend from the wall a distance of the wall opening height plus 3 ft (0.91 m).~~ and~~ **10.4.3.2.2.2** The horizontal track section shall be connected by a fusible track link to the vertical track section such that the track breaks away from the vertical track section if subjected to damage from falling materials at the time of fire.	NFPA MOS does not permit multiple requirements within a single section.	
48	**10.4.3.2.4 Interlocking.** An angle-type interlock shall be bolted to the lintel ~~and~~ ~~shall~~that engages a matching pocket on the top edge of the door when in the closed position.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
49	**11.4.2.2.2** When automatic closing is accomplished by means of a power operator, the door shall remain in the closed position until the closing device has been reset, unless otherwise permitted by 11.4.2.2.3.~~or shall be permitted to automatically open and then reclose if a sensing edge has been provided and an obstruction is encountered during automatic closure.~~ ~~**11.4.2.2.2.1** The door shall remain in the closed position until the automatic closing device has been reset.~~ **11.4.2.2.3** ~~When an a~~Automatic closing device~~s is designed~~shall be permitted to automatically open and reclose a maximum of three times when encountering ~~an~~ obstruction~~s., the unit shall be designed such that it can reopen a maximum of three times.~~ **11.4.2.2.~~3.1~~4** After encountering an obstruction for the third time, the bottom bar shall come to rest on the obstruction.	NFPA MOS does not permit multiple requirements within a single section and single subsections.	
50	**13.4.1** All service counter fire doors shall be ~~equipped to close automatically in the event of fire.~~automatic-closing doors. ~~**13.4.2** A service counter fire door of the rolling type shall be automatic closing so that, upon activation or release of a fusible link or detector, the door shall close.~~ **13.4.~~3~~ 2** ~~A service counter fire door of the s~~Swinging or sliding type service counter fire doors shall be made automatic closing by a system of weights suspended by ropes, cables, or chains over pulleys that, when activated by release of an automatic fire detector~~, shall~~ cause the door to close. **13.4.~~4~~ 3** A governor, where employed on a service counter fire door, shall work in coordination with the closing device and ~~shall~~ control the closing speed of the door.	NFPA MOS does not permit multiple requirements within a single section.	13.4.2 was removed as it is redundant with the definition for “Automatic-closing door”.
51	**14.2.1.3.1** One label shall be provided for the door panels. ~~and shall be located so that it is visible after installation.~~ **14.2.1.3.2** One label shall be provided for the frame. ~~and shall be located so that it is visible after installation.~~ **14.2.1.3.3** Required labels shall be in locations that are visible after installation.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
52	**14.2.2.3.1** One label shall be provided for the door panels ~~and shall be located so that it is visible after installation~~. **14.2.2.3.2** One label shall be provided for the frame, unless permitted by 14.2.2.3.3. ~~and shall be located so that it is visible after installation~~. ~~**14.2.2.3.3** Required labels shall be in locations that are visible after installation.~~ **14.2.2.3.3~~2.1~~** Labels on frames shall not be required where frames are installed in masonry or concrete and where the panel overlaps the opening by 5⁄8 in. (9.5 mm) beyond the thickness of any facing used to finish the opening. **14.2.2.3.4** Required labels shall be in locations that are visible after installation.	NFPA MOS does not permit multiple requirements within a single section and single subsections.	
53	**14.2.3.3** One label shall be provided for the door panels ~~and shall be located so that it is visible after installation~~. **14.2.3.4** Where a frame is provided or required, one label shall be provided for the frame, unless permitted by 14.2.3.5 ~~and shall be located so that it is visible for review by the AHJ after installation~~. ~~**14.2.3.5** Required labels shall be in locations that are visible after installation.~~ **14.2.3.~~4.1~~5** Labels on frames shall not be required where frames are made from structural steel channel and are installed in masonry or concrete and where the panel overlaps the thickness of any facing used to finish the opening by 2 in. (51 mm). … **14.2.3.6** A master label indicating the name of the manufacturer shall be provided for the door panel where installed in drywall ~~and shall be located so that it is visible for review by the AHJ after installation~~. **14.2.3.7** Required labels shall be in locations that are visible after installation.	NFPA MOS does not permit multiple requirements within a single section and single subsections.	
54	**15.2 Chute Discharge Doors.** **15.2.1 ~~Operation.~~** Openings in the fire resistance–rated enclosure shall have a fire protection rating as follows: (1) 1 1⁄2-hour fire protection rating for 2-hour fire resistance–rated enclosures (2) 1-hour fire protection rating for 1-hour fire resistance–rated enclosures	NFPA MOS does not permit single header in section.	

#	Proposed Change	Editorial Note	Task Group Notes
55	**15.3 Chute Intake Doors.** **15.3.1 General Access Gravity Waste Chutes.** 15.3.~~2~~1.1 All chute intake doors into a waste chute shall be provided with a self-closing and positive latching fire door assembly in accordance with 15.2.1. [**82:**6.2.3.3.1.1] 15.3.~~3~~1.2 The fire door assembly shall be installed in accordance with its listing. [**82:**6.2.3.3.1.2] 15.3.~~4~~1.3 The design and installation shall be such that no part of the frame or door projects into the chute. [**82:**6.2.3.3.1.3] 15.3.~~5~~1.4 The area of each chute intake door shall be limited to one-third of the cross-sectional area of a square chute and 44 percent of the area of a round chute. [**82:**6.2.3.3.1.4] **15.~~4~~3.2 Limited-Access Gravity Chutes.** **15.~~5~~3.3 Pneumatic Chute Intake Doors.**	NFPA MOS does not permit single header in section.	Editorial to renumber all subsections under 15.4 & 15.5.
56	**16.1.3.4** Access doors shall be self-latching, unless permitted by 16.1.2.5. **16.1.3.~~5~~4.1 ~~A h~~**Horizontal access doors that ~~does~~ do not open downward and that remain~~s~~ in place when an upward force of 1 lb/ft2 (48 N/m2) is applied over the entire exposed surface of the door shall not be required to be self-latching.	NFPA MOS does not permit single subsections.	
57	**16.2.1.1** Door assemblies used in fire resistance–rated floor-ceiling or roof-ceiling assemblies shall be tested in the horizontal position in accordance with the procedures described in ASTM E119, Standard Test Methods for Fire Tests of Building Construction and Materials, or ANSI/UL 263, Standard for Fire Tests of Building Construction and Materials.~~, and~~ **16.2.1.2** Horizonal access doors shall be labeled as horizontal access doors. **16.2.1.~~2~~ 3** ~~A h~~Horizontal access doors shall bear ~~a~~ labels that includes the additional wording “For Horizontal Installation.” **16.2.1.~~3~~ 4** ~~A h~~Horizontal access doors shall be used in a fire-resistance-rated floor/ceiling or roof/ceiling assemblies~~y~~ only where ~~it has been~~ tested and listed for use as a component of the assembly.	NFPA MOS does not permit multiple requirements within a single section.	
58	**16.2.2.~~43~~.1** ~~Such an access d~~Doors ~~as described in~~required to comply with 16.2.2.3 shall bear a label indicating a maximum temperature rise of 250°F (139°C).	NFPA MOS does not permit single subsections.	

#	Proposed Change	Editorial Note	Task Group Notes
59	**17.2.3.2** The label or other identification shall be permanently applied ~~and shall be~~in a location that is visible after installation.	NFPA MOS does not permit multiple requirements within a single section.	
60	**17.3.1.1 ~~Partitions.~~** Fire windows shall be used to protect openings in interior and exterior partitions required by the AHJ to be protected.	NFPA MOS does not permit single section to have header.	
61	**17.4.1 Frames.** **17.4.1.1** Frames shall be fastened securely to the wall. ~~and~~ **17.4.1.2** Frames shall be capable of resisting all wind stresses and any other stresses for which the window was designed.	NFPA MOS does not permit multiple requirements within a single section.	
62	**17.5 Closing Devices.** **17.5.1** All fire windows shall be of a fixed type or ~~shall be~~ automatic closing. **17.5.2*** The automatic-closing device shall be permitted to be an integral part of the assembly or a separate system~~, such as weights suspended by ropes, wire cables, or chains over pulleys,~~ arranged so that operation of the automatic fire detector ~~shall~~ cause**s** the ventilator to close. **A.17.5.2** Examples of separate systems include weights suspended by ropes, wire cables, or chains over pulleys.	NFPA MOS does not permit multiple requirements within a single section.	Examples are moved to the annex.
63	**19.3.5 Documentation.** **19.3.5.1** A record of ~~A~~all inspections and testing shall be ~~documented~~provided~~,~~ ~~indicating~~ that includes all of the following: 1) ~~the l~~Location of the damper~~,~~ 2) Ddate(s) of inspection~~,~~ 3) ~~n~~Name of inspector~~, and~~ ~~1)~~4) ~~d~~Deficiencies discovered~~.~~ **19.3.5.~~2~~ 3** The documentation shall have a space to indicate when and how the deficiencies were corrected.	NFPA MOS does not permit multiple requirements within a single section.	
64	**19.4.5.2** The damper shall then be manually reset to its full-open position. ~~and t~~ **19.4.5.**3 The fusible link shall be reinstalled or replaced.	NFPA MOS does not permit multiple requirements within a single section.	The task group added the option to replace the fusible link. It is recognized that this is beyond editorial, but this makes the requirement consistent with 19.5.2.2.6.

#	Proposed Change	Editorial Note	Task Group Notes
65	**19.5.1.2** After the inspection and test required by 19.5.1.1, the test and inspection frequency for dampers shall comply with one of the following: (1) ~~shall then be e~~Every 4 years~~,~~ ~~(1)~~(2) Every 6 years, ~~except~~ in buildings containing a hospital~~, where the frequency shall be every 6 years.~~	NFPA MOS does not permit multiple requirements within a single section.	
66	**19.5.1.4 Modifications.** **19.5.1.4.1** Position indication functionality shall be permitted to be added to an existing damper not originally designed with position indication provided that the accuracy of the open and closed indication method is confirmed as required by 19.5.2.3.3.1(C). **19.5.1.4.2** Any field modifications made to ~~the~~ dampers which have position indicating functionality added shall be installed per the manufacturer's installation instructions for retrofitted equipment.	NFPA MOS does not permit multiple requirements within a single section.	
67	**19.5.2.2.6** At the completion of the test, the damper shall be returned to the full-open position.~~, and~~ **19.5.2.2.7** ~~t~~The fusible link shall be reinstalled or replaced.	NFPA MOS does not permit multiple requirements within a single section.	
68	**19.5.2.3.2 Visual Inspection Method.** A visual inspection shall include all of the following: (1) ~~**19.5.2.3.2.1**~~ Visually confirm that the damper is in the full-open or full-closed position as required by the system design. (2) ~~**19.5.2.3.2.2**~~ Command and visually confirm the damper to the full-closed or full-open position. (3) ~~**19.5.2.3.2.3**~~ Restore and visually confirm the damper to the original operating position as required by the system design.	NFPA MOS requires that all sections be in mandatory language.	
69	**19.5.3.1** A record of ~~A~~all inspections and testing shall be ~~documented~~provided that includes the following information:~~, indicating t~~ (1) ~~he l~~Location of the damper~~,~~ (2) ~~d~~Date of inspection~~,~~ (3) ~~n~~Name of inspector~~, and~~ (4) ~~d~~Deficiencies discovered~~.~~ **19.5.3.2** The documentation shall have a space to indicate when and how the deficiencies were corrected.	NFPA MOS does not permit multiple requirements within a single section.	
70	**20.2.1.1** Fabric fire safety curtains shall be made of one or more thicknesses of a noncombustible base fabric.~~, which~~ **20.2.1.2** Noncombustible base fabric shall be permitted to have a high temperature coating, provided the modified fabric meets the test requirements of Section 20.2.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
71	**20.2.1.14.3*** The fire safety curtain shall have a bottom pocket containing a Schedule 40 pipe with a minimum nominal 2 in. (51 mm) diameter, unless permitted by 20.2.1.14.4. **20.2.1.14.4** Framed curtains shall not require a pocket if they meet the requirements of 20.2.1.11. **20.2.1.14.45** During the test period ~~T~~the unexposed surface of the fire safety curtain shall not flame. ~~, and~~ **20.2.1.14.6** During the test period smoke shall not penetrate the material ~~during the test period~~.	NFPA MOS does not permit multiple requirements within a single section.	
72	**20.2.3.2** The bumper (yield pad) shall be all the following: (1) ~~a~~ A compressible pad, (2) ~~a~~A minimum of 3 in. (76 mm) in diameter~~,~~ (3) ~~m~~Made with an outer covering of the curtain fabric ~~and~~ (4) ~~f~~Filled with fiberglass or other noncombustible materials at a minimum 3 lb/ft3 (48 kg/m3) density ~~and shall be~~ ~~(1)~~(5) ~~o~~Oriented in a manner that allows the weight of the bottom batten or frame member to compress the yield pad firmly against the stage floor~~.~~	NFPA MOS does not permit multiple requirements within a single section.	
73	**20.4.1.1.5** The side guide cable utilized shall be a minimum 1⁄4 in. (6.35 mm) diameter 7 × 19 galvanized aircraft cable installed using thimbles and two forged wire rope clips or one swage fitting at each end of the guide cables. **20.4.1.1.6** A minimum 3⁄8 in. (9.5 mm) moused turnbuckle or equivalent mechanical tensioning means shall be installed in the guide cable for adjustment.	NFPA MOS does not permit multiple requirements within a single section.	
74	**20.4.1.3.5** ~~The g~~Guide shoes shall be fitted to the above-edge guide system. ~~and~~ **20.4.1.3.6** Guide shoes shall be bolted to the sides of the framed fire safety curtain to guide the framed fire safety curtain through the entire vertical travel of the curtain.	NFPA MOS does not permit multiple requirements within a single section. Would the use of “each guide shoe” make more sense than “the guide shoe”	
75	**20.4.3.2** The frame shall be constructed of noncombustible materials ~~and shall have~~with a minimum thickness of 4 in. (102 mm).	NFPA MOS does not permit multiple requirements within a single section.	
76	**20.4.4 Unframed Fire Safety Curtain Assembly~~.~~** **~~20.4.4.1~~ – Guide Systems.**	NFPA MOS does not permit single subsections.	

#	Proposed Change	Editorial Note	Task Group Notes
77	**20.4.5 Brail Fire Safety Curtain Assembly.** ~~A b~~Brail fire safety curtain ~~assembly~~ assemblies shall meet the requirements of Section 20.2 as modified by 20.4.5.~~, with the following modifications:~~ **20.4.5.1** Fire safety curtains shall have minimum 5 percent fullness in the height only. **20.4.5.2** The side guide cable system shall utilize bronze alloy spool guides on maximum 18 in. (457 mm) vertical centers on both edges. **20.4.5.3** Edge reinforcement shall not be required. **20.4.5.4** Each spool guide shall be attached to the fire safety curtain's sides by three or more machine screw assemblies or an equivalent attachment system. **20.4.5.4** The side guide cable utilized shall be a minimum 1⁄4 in. (6.4 mm) diameter 7 × 19 galvanized aircraft cable installed using at least 3⁄8 in. (9.5 mm) moused turnbuckles, thimbles, and two forged wire rope clips or one swage fitting at each end of the guide cables. **20.4.5.6** The guide cable shall be secured to the building structure or to the vertical guide pocket. **20.4.5.7** Vertical lift lines shall be a minimum of 1⁄4 in. (6.4 mm) diameter, 7 × 19 galvanized aircraft cable~~ and~~ **20.4.5.8** Vertical lift lines shall be spaced on a maximum of 18 ft (5.5 m) centers. **20.4.5.9** The outermost two cables shall be a maximum of 3 ft (914 mm) from the curtain's vertical edges. **20.4.5.10** Each lift line shall operate on a path reinforced with a layer of the fire safety curtain's fabric or equivalent webbing, with plated welded steel D rings on maximum 18 in. (457 mm) vertical centers. **20.4.5.11** The lift lines shall create an accordion fold–type storage arrangement. **20.4.5.12** The batten pocket shall not be cut to facilitate the installation of lift lines. **20.4.5.13** Each lift line connecting to the bottom batten shall use a single-piece (clamshell-style) steel pipe clamp a minimum of 1⁄8 in. (3.2 mm) thick.	NFPA MOS does not permit multiple requirements within a single section. Track changes does not show number deletions, changed this from a list to individual sections.	
78	**20.6.3** Lift lines and their supporting components and termination shall be rated by the manufacturer for the imposed load.~~ and~~ **20.6.4** Lift lines and their supporting components shall be installed in accordance with the manufacturer's instructions.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
79	**20.6.5.3*** Vertical guide pockets shall extend vertically from the stage floor to a point above the top of the open fire safety curtain assembly. and **20.6.5.4*** Vertical guide pockets shall be fastened or welded to the proscenium wall. **20.6.5.4 5** Vertical guide pockets shall be fabricated using a minimum of structural steel channel and 1⁄4 in. (6.4 mm) steel plates or 1⁄4 in. (6.4 mm) thick steel formed shapes and plates. **20.6.5.4.16** Steel shapes and plates for vertical guide pockets shall be connected with minimum 3⁄8 in. (9.5 mm) diameter grade 5 bolts. **20.6.5.5 7** Vertical guide pockets shall be set back from the vertical edges of the proscenium opening. **20.6.5.5.18** This The vertical guide pocket set back distance shall be determined by the 18 in. (457 mm) fire safety curtain assembly overlap with the side of the proscenium.	NFPA MOS does not permit multiple requirements within a single section or single subsections.	Reassociated A.20.6.5.3 to 20.6.5.4.
80	**20.6.6 Battens.** **20.6.6.1** Battens in unframed fire safety curtains shall be designed to limit vertical deflection to 1⁄180 (0.006) of the span between any two lift lines with no pressure differential.	NFPA MOS does not permit a single in-line header.	
81	**20.6.7.2** The number of stay chains shall be equal to the number of lifting cables. **20.6.7.32.1** Stay chains shall be located within 4 ft (1.2 m) of the ends of the curtain and as required by 20.6.7.4., and r **20.6.7.4** Remaining chains shall be equally spaced. **20.6.7.3 5** Stay chains shall be fastened to the gridiron, the structural steel of the building, or the proscenium wall and **20.6.7.6** Stay chains shall be sized for the shock loads imposed.	NFPA MOS does not permit multiple requirements within a single section or single subsections.	
82	**20.6.8.21.1** Purchase lines for manually rigged counterweight fire safety curtain assemblies shall be a synthetic polyester rope having a minimum tensile strength of 8500 lb (3856 kg).	NFPA MOS does not permit single subsections.	
83	**20.6.8.3.14** The top spreader (tie) plate shall be a locking type and shall securelock to each arbor rod.	NFPA MOS does not permit multiple requirements within a single section or single subsections.	
84	**20.6.10.5** A latching emergency stop button shall be located at every control station for stopping emergency operation. but **20.6.10.6** The emergency stopping operation shall not prevent or impede emergency closing of the fire safety curtain.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Editorial Note	Task Group Notes
85	**20.7.2.2** For nonemergency operation, controls shall require constant pressure to close the fire safety curtain, unless permitted by 20.7.2.3. **20.7.2.~~2.1~~3** ~~As an alternative,~~Constant pressure on the controls shall not be required where the fire safety curtain ~~shall be~~is provided with a continuous sensing device attached to the bottom of the curtain to stop or reverse the curtain upon contact with an obstruction.	NFPA MOS does not permit single subsections.	
86	**20.7.3.4*** Manual emergency closing of the curtain shall be accomplished by a quick-release mechanism. **20.7.3.4.1** There shall be at least two manual release mechanisms located on the stage side of the proscenium wall, one right of the proscenium opening and one left of the proscenium opening. **20.7.3.4.~~1~~ 2** Operations requiring cutting or severing a line shall not be permitted.	NFPA MOS does not permit multiple requirements within a single section or single subsections.	
87	**20.8.2~~1.1~~** The fire safety curtain assembly shall be deemed to have passed the requirement in 20.8.1 when the assembly has been demonstrated to successfully descend in an emergency release condition three consecutive times.	NFPA MOS does not permit single subsections.	
88	**20.8.6~~4.1~~** Acceptance testing shall be conducted by the installing contractor in accordance with the requirements of Chapter 20.	NFPA MOS does not permit single subsections.	
89	**21.4 Power Operators.** **21.4.1** Power operators shall be provided with a standby or emergency power source to close the curtain upon activation, unless permitted by 21.4.2. ~~or~~ **21.4.2** Standby or emergency power shall not be required for power operators ~~shall be~~ capable of closing the curtain without power.	NFPA MOS does not permit multiple requirements within a single section.	
90	**21.10.1** ~~Repairs shall be made, and d~~Defects that could interfere with operation shall be ~~corrected~~ repaired without delay.	NFPA MOS does not permit multiple requirements within a single section.	

Task Group	Damper ITM [NFPA 80]
Scope	Review the requirements for Operational Test, Acceptance Testing, and Periodic Testing for dampers in NFPA 80 and NFPA 105. Determine if the requirements of these three sections can be consolidated.
Recommendation	Create first revision
Substantiation	Due to industry concerns related to dampers, the TC of NFPA 80 commissioned a Task Group to review the requirements for dampers in NFPA 80 and 105, to determine if changes are necessary to provide clarity. Additionally, the TG instruction for NFPA 80 & 105, was to review the requirements for Operational Test, Acceptance Testing, and Periodic Testing for dampers in and determine if and how the requirements of these three sections can be consolidated. The recommended changes have been submitted and are presented to the TC for review.

19.3 Inspection, Testing, and Maintenance.

19.3.1 General.

19.3.1.1 Operability.

Dampers shall be operable at all times.

19.3.1.1.1*

Foreign material shall be prohibited from passing through the open damper assembly.

A.19.3.1.1.1

Foreign materials include cables, pipes, and electrical wire.

19.3.1.1.2

Wedging or blocking of the dampers in the open position shall be prohibited.

19.3.1.1.3

When replace, dampers shall comply NFPA 90A.

19.3.1.2 Prevention of Blockage.

19.3.1.2.1

Damper openings shall be kept clear of anything that could obstruct or interfere with the free operation of the damper.

19.3.1.2.2

Blocking or wedging of dampers in the open position shall be prohibited.

19.3.1.3 Replacement.

Where it is necessary to replace dampers, replacements shall meet the requirements of 19.2.

19.3.2 ~~Field~~ Modifications. [19.7]

19.3.2.1 [19.7.1]

Any field modification made to the damper shall be in accordance with the damper manufacturer's installation instructions and listing.

19.3.2.2 [19.7.2]

Position indication functionality shall be permitted to be added to an existing damper not originally designed with position indication provided that the accuracy of the open and closed indication method is confirmed as required by 19.5.2.3.3.1(C).

19.3.2.3 [19.7.2]

Where the field modification includes adding the capability for remote inspection, the position indicator devices and monitoring equipment shall be tested for functionality in accordance with 19.5.2.3.3.

~~19.3~~19.4 Operational Test. [Renumber all subsection]

19.3.1 Fire Dampers.

After the installation of a damper is completed, an operational test shall be conducted.

19.3.1.1

The damper shall fully close from the open position.

19.3.1.2

When equipped with smoke detection activation, testing shall be performed in accordance with NFPA 4.

19.3.1.3

For dynamic dampers, it shall be verified that the system airflow where the damper is installed is within the velocity rating of the damper listing.

19.3.1.4

The operational test shall verify that there are no obstructions to the operation of the damper.

19.3.1.5

The operational test shall verify that there is full and unobstructed access to the fire damper and all listed components.

19.3.1.6

All indicating devices shall be verified to work and report to the intended location.

19.3.1.7*

The fusible link operating temperature shall be in accordance with NFPA 90A and UL 33, *Heat Responsive Links for Fire-Protection Service,* temperature classifications and ratings.

19.3.2 Combination Fire and Smoke Dampers.

After the installation of a dynamic combination fire and smoke damper is complete, an operational test shall be conducted.

19.3.2.1

The test shall determine that the system has been installed and functions as intended.

19.3.2.2

The operational test shall be conducted under nonfire HVAC airflow conditions as well as static flow conditions.

19.3.2.3

The operational test shall verify that there are no obstructions to the operation of the dynamic combination fire and smoke damper.

19.3.2.4

The operational test shall verify that there is full and unobstructed access to the dynamic combination fire and smoke damper and all listed components.

19.3.2.5

All indicating devices shall be verified to work and report to the intended location.

19.3.2.6

The dynamic combination fire and smoke damper shall also meet the testing requirements contained in Chapter 7 of NFPA 105.

19.3.3 Corridor Dampers.

Once damper installation is complete, an operational test shall be conducted.

19.3.3.1

The damper shall fully close from the open position.

19.3.3.2

The system airflow where the damper is installed shall be verified to be within the velocity rating of the damper listing.

19.3.3.3

The operational test shall be conducted in accordance with 19.3.2.

19.3.3.4

All indicating devices shall be verified to work and report to the intended location.

19.3.3.5

Where so equipped, the fusible link operating temperature shall be in accordance with the temperature classifications and ratings of NFPA 90A and UL 33, *Heat Responsive Links for Fire-Protection Service*.

19.3.4 Inspection.

Following completion of the test, a visual inspection shall be made of the assembly to ensure no obstructions have been introduced.

19.3.5 Documentation.

19.3.5.1

All inspections and testing shall be documented, indicating the location of the damper, date(s) of inspection, name of inspector, and deficiencies discovered.

19.3.5.2

The documentation shall have a space to indicate when and how the deficiencies were corrected.

~~19.4~~19.5 Acceptance Testing. [Renumber all subsections]

19.4.1

Acceptance testing of dampers shall be performed by a qualified person with knowledge and understanding of the operating components of the type of assembly being tested and the system in which it is installed.

19.4.2

Before testing, a visual inspection shall be performed to identify any damaged or missing parts that can create a hazard during testing or affect operation or resetting.

19.4.3

Acceptance testing for dampers without fusible links shall be conducted after the building mechanical ventilation system has been balanced.

19.4.3.1

If the damper is equipped with a variable air volume system, acceptance testing shall be conducted under maximum airflow.

19.4.3.2*

Acceptance testing for dampers with fusible links shall be permitted to have the fan shut off during testing.

19.4.4 Actuated Damper.

19.4.4.1

Acceptance testing of dampers designed to close via an electric or pneumatic actuator shall be conducted by removing electrical power or air pressure from the actuator and ensuring that the damper closes properly.

19.4.4.2

Electrical power or air pressure shall then be reapplied to the damper to confirm that it returns to its full-open position.

19.4.5* Nonactuated Damper.

19.4.5.1

Acceptance testing of dampers designed to close via a spring(s) or by gravity shall be conducted by removing the fusible link and confirming that the damper closes properly.

19.4.5.2

The damper shall then be manually reset to its full-open position and the fusible link shall be reinstalled.

19.4.6

If the damper is equipped with a variable air volume system, acceptance testing shall be conducted after the building mechanical ventilation system has been balanced and in operation under maximum air flow.

19.4.7

A record of these inspections and testing shall be made in accordance with 19.5.3.

~~19.5~~19.6* Periodic Inspection and Testing.

19.5.1 Testing Frequency.

19.5.1.1

Each damper shall be tested and inspected 1 year after acceptance testing.

19.5.1.2

After the inspection and test required by 19.5.1.1, the test and inspection frequency shall then be every 4 years, except in buildings containing a hospital, where the frequency shall be every 6 years.

19.5.1.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

19.5.1.4

Position indication functionality shall be permitted to be added to an existing damper not originally designed with position indication provided that the accuracy of the open and closed indication method is confirmed as required by 19.5.2.3.3.1(C). Any field modifications made to the damper shall be installed per the manufacturer's installation instructions for retrofitted equipment.

19.5.2 Test Method.

19.5.2.1 General.

All tests shall be completed in a safe manner by personnel wearing personal protective equipment.

19.5.2.2* Periodic Testing for Fusible Link Operated Dampers.

19.5.2.2.1

Fusible links or other moveable parts shall not be painted or coated, unless listed by the testing agency.

19.5.2.2.2

The fan shall be permitted to be shut off during testing.

19.5.2.2.3*

The fusible link shall be removed or activated with the damper in the full-open position.

19.5.2.2.4

With the fusible link removed or activated, the damper shall close completely without assistance.

19.5.2.2.5

Where the damper is designed with a latch to hold the damper in the full-closed position, the operation of the latch shall be confirmed.

19.5.2.2.6

At the completion of the test, the damper shall be returned to the full-open position, and the fusible link shall be reinstalled or replaced.

19.5.2.2.7

If the link appears damaged, it shall be replaced with a functionally equivalently listed link.

19.5.2.2.8

At the completion of the test, it shall be verified that the damper is unobstructed and in a fully operational mode.

19.5.2.3 Periodic Testing for Dampers That Do Not Use a Fusible Link to Operate.

19.5.2.3.1* General.

Fans shall not be permitted to be shut down during the test.

19.5.2.3.2 Visual Inspection Method.

19.5.2.3.2.1

Visually confirm that the damper is in the full-open or full-closed position as required by the system design.

19.5.2.3.2.2

Command and visually confirm the damper to the full-closed or full-open position.

19.5.2.3.2.3

Restore and visually confirm the damper to the original operating position as required by the system design.

19.5.2.3.3 Remote Inspection Method.

19.5.2.3.3.1 General.

(A)

A damper with remote inspection capability shall positively indicate when the damper is fully open and fully closed.

(B)

The initial remote inspection shall include a visual inspection of the damper in accordance with 19.5.2.3.2.

(C)

The visual inspection shall confirm that the position indication method accurately reflects the full-open and full-closed position of the damper.

19.5.2.3.3.2 Test Procedure.

(A)

A signal from the damper’s position indication device shall confirm that the damper is in the full-open or full-closed position as required by the system design.

(B)

The damper shall be commanded and confirmed to the full-closed or full-open position.

(C)

The damper shall be confirmed to the original operating position as required by the system design.

(D)

If the remote inspection fails to comply with 19.5.2.3.3.2(A) through 19.5.2.3.3.2(C), a visual inspection shall be performed in accordance with 19.5.2.3.2.

19.5.3 Documentation.

19.5.3.1

All inspections and testing shall be documented, indicating the location of the damper, date of inspection, name of inspector, and deficiencies discovered. The documentation shall have a space to indicate when and how the deficiencies were corrected.

19.5.3.2

All documentation shall be maintained for at least three test cycles and made available for review by the AHJ.

19.6.4 Performance-Based Option.

19.6.4.1

As an alternate means of compliance with 5.2.4, subject to the AHJ, dampers shall be permitted to be inspected, tested, and maintained under a written performance-based program under the direction of a qualified person.

19.6.4.2

Goals established under a performance-based program shall provide assurance that the damper will perform its intended function when exposed to fire conditions.

19.6.4.3

Technical justification for inspection, testing, and maintenance intervals shall be documented in writing.

19.6.4.4

The performance-based option shall include historical data acceptable to the AHJ.

~~19.6~~ 19.7 Maintenance. [Renumber all subsections]

19.6.1

Reports of abrupt changes in airflow or noise from the duct system shall be investigated to verify that they are not related to damper operation.

19.6.2*

All exposed moving parts of the damper shall be dry lubricated as required by the manufacturer.

19.6.3

If the damper is not operable, repairs shall begin without delay.

19.6.4

Following any repairs, the damper shall be tested for operation in accordance with Section 19.5.

19.6.5

All maintenance shall be documented in accordance with 19.5.3.1 and 19.5.3.2.

19.6.6

Maintenance of combination fire and smoke dampers and corridor dampers shall also meet the maintenance requirements in Chapter 7 of NFPA 105.

Task Group	Damper ITM [NFPA 105]
Scope	Review the requirements for Operational Test, Acceptance Testing, and Periodic Testing for dampers in NFPA 80 and NFPA 105. Determine if the requirements of these three sections can be consolidated.
Recommendation	Create first revision
Substantiation	Due to industry concerns related to dampers, the TC of NFPA 80 commissioned a Task Group to review the requirements for dampers in NFPA 80 and 105, to determine if changes are necessary to provide clarity. Additionally, the TG instruction for NFPA 80 & 105, was to review the requirements for Operational Test, Acceptance Testing, and Periodic Testing for dampers in and determine if and how the requirements of these three sections can be consolidated. The recommended changes have been submitted and are presented to the TC for review.

~~**7.2 Definitions. (Reserved)**~~

~~**7.3**~~**7.2 Installation. [Renumber all subsections]**

7.3.1 Dampers.

7.3.1.1

Smoke dampers shall be installed within 24 in. (610 mm) of the partition and before any branch line or opening other than access panel and shall be installed in accordance with the manufacturer's installation instructions and the listing.

7.3.1.2*

For new damper installations, the damper manufacturer's installation and maintenance instructions shall be maintained on-site.

7.3.1.3

Damper actuator and linkage to operate the smoke damper shall be supplied and installed at the factory.

7.3.2

Dampers equipped with fusible links and/or internal operators shall be provided with an access door that is not less than 12 in.^{2} (7742 mm^2) or provided with a removable duct section.

7.3.2.1

Dampers that are installed behind registers, diffusers, or grilles shall be serviceable by removal of these covers.

7.3.2.2

A smoke damper access panel shall be labeled with the words "Smoke Damper" in letters not less than **1/2** in. (13 mm) in height. External insulation shall not conceal any access panel unless there is a label attached to the insulation clearly indicating the exact location of the access panel and the insulation is installed for ease of removal or ease of removal with the access panel.

7.3.2.3

Unobstructed access shall be provided through a ceiling or wall for inspection and service of the damper's working parts.

7.3.2.4

Installation of combination fire and smoke dampers shall be in accordance with the installation of fire dampers in NFPA 80, Section 19.2.

7.3.2.5

Smoke detectors used to control smoke dampers or combination fire and smoke dampers shall be spaced and installed per the requirements of *NFPA 72*.

7.3 Inspection, Testing, and Maintenance.

7.3.1 General.

7.3.1.1 Operability.

Dampers shall be operable at all times.

7.3.1.1.1*

Foreign material shall be prohibited from passing through the open damper assembly.

A.7.3.1.1.1

Foreign materials include cables, pipes, and electrical wire.

7.3.1.1.2

Wedging or blocking of the dampers in the open position shall be prohibited.

7.3.1.1.3

When replace, dampers shall comply NFPA 90A.

7.3.1.2 Prevention of Blockage.

7.3.1.2.1

Damper openings shall be kept clear of anything that could obstruct or interfere with the free operation of the damper.

7.3.1.2.2

Blocking or wedging of dampers in the open position shall be prohibited.

7.3.1.3 Replacement.

Where it is necessary to replace dampers, replacements shall meet the requirements of 7.3.

7.3.2 ~~Field~~ Modifications. [7.7]

7.3.2.1 [7.7.1]

Any field modification made to the damper shall be in accordance with the damper manufacturer's installation instructions and listing.

7.3.2.2 [7.7.2]

Position indication functionality shall be permitted to be added to an existing damper not originally designed with position indication, provided that the accuracy of the open and closed indication method is confirmed as required by 7.5.2.3.3.

7.3.2.3 [7.7.3]

Where the field modification includes adding the capability for remote inspection, the position indicator devices and monitoring equipment shall be tested in accordance with 7.5.2.3.3.1(A).

7.4 Operational Test.

7.4.1 Smoke, Combination Fire and Smoke, and Corridor Dampers.

An operational test shall be conducted after the building's HVAC system has been balanced.

7.4.1.1

The test shall be adequate to determine that the damper has been installed and functions as intended.

7.4.1.2

The operational test shall be conducted under normal HVAC airflow and nonairflow conditions. The damper shall fully close under both test conditions.

7.4.1.3

The operational test shall verify that there are no obstructions to the operation of the damper.

7.4.1.4

The operational test shall verify that there is full and unobstructed access to the damper and all appurtenances.

7.4.1.5

All indicating devices shall be verified to work properly and report to the intended location.

7.4.1.6

Combination fire and smoke dampers and corridor dampers shall also meet the testing requirements contained in NFPA 80, Section 19.3.

7.4.2 Documentation.

7.4.2.1

All inspection and testing shall be documented, including the location of the damper, date(s) of inspection, name of the inspector, and deficiencies discovered.

7.4.2.2

The documentation shall have a space to indicate when and how the deficiencies were corrected.

7.5 Inspection and Testing.

Inspection and testing shall be performed by a qualified person.

7.5.1 Acceptance Testing.

7.5.1.1

Before testing, a visual inspection shall be performed to identify any damaged or missing parts that could create a hazard during testing, or affect operation or resetting.

7.5.1.2*

Acceptance testing shall be conducted after the building mechanical ventilation system has been balanced, and in operation under maximum airflow, if equipped with a variable air volume system.

7.5.1.3

Acceptance testing shall be conducted by removing electrical power or air pressure from the actuator and ensuring that the damper fully closes.

7.5.1.4

Electrical power or air pressure shall then be reapplied to the damper to confirm that it returns to its full-open position.

7.5.1.5

A record of these inspections and testing shall be made in accordance with 7.5.2.4.

7.5.2 Periodic Testing.

7.5.2.1 General.

7.5.2.1.1

Smoke dampers for dedicated and nondedicated smoke control systems shall be inspected and tested in accordance with NFPA 92.

7.5.2.1.2

Combination fire and smoke dampers and corridor dampers shall be inspected and tested in accordance with NFPA 80.

7.5.2.2* Testing Frequency.

7.5.2.2.1

Each damper shall be inspected and tested 1 year after the completion of acceptance testing.

7.5.2.2.2*

After the inspection and test required by 7.5.2.2.1, the test and inspection frequency shall then be every 4 years, except in buildings containing a hospital, where the frequency shall be every 6 years.

7.5.2.2.3*

In existing, fully ducted HVAC systems, periodic testing shall not be required for a single damper that is not accessible within a rated barrier or shaft.

7.5.2.3 Test Method.

7.5.2.3.1 General.

7.5.2.3.1.1

All tests shall be completed in a safe manner by personnel wearing personal protective equipment (PPE).

7.5.2.3.1.2

Fans shall not be permitted to be shut down during the test.

7.5.2.3.2 Visual Inspection Method.

Visual inspection shall include all of the following:

(1) Visually confirm that the damper is in the full-open or full-closed position as required by the system design.

(2) Command and visually confirm the damper to the full-closed or full-open position.

(3) Restore and visually confirm the damper to the original operating position as required by the system design.

7.5.2.3.3 Remote Inspection Method.

7.5.2.3.3.1 General.

(A)

A damper with remote inspection capability shall positively indicate when the damper is fully open and fully closed.

(B)

The initial remote inspection shall include a visual inspection of the damper in accordance with 7.5.2.3.2.

(C)

The visual inspection shall confirm that the position indication method accurately reflects the full-open and full-closed position of the damper.

7.5.2.3.3.2 Test Procedure.

(A)

The full-open or full-closed position, as required by the system design, shall be confirmed via the damper's position indication device.

(B)

The damper shall be commanded and confirmed to the full-closed or full-open position.

(C)

The damper shall be confirmed to be in the original operating position as required by the system design.

(D)

If the remote inspection fails to comply with the requirements of 7.5.2.3.3.2(A) through 7.5.2.3.3.2(C), a visual inspection shall be performed in accordance with 7.5.2.3.2.

7.5.2.4 Documentation.

7.5.2.4.1

All inspections and testing shall be documented indicating the location of the damper, date of inspection, name of inspector, and deficiencies discovered.

7.5.2.4.2

The documentation shall have space to indicate when and how the deficiencies were corrected.

7.5.2.4.3

All documentation shall be maintained for at least three test cycles and made available for review by the AHJ.

7.5.2.5 Performance-Based Option.

7.5.2.5.1

As an alternate means of compliance, subject to the AHJ, dampers shall be permitted to be inspected, tested, and maintained under a written performance-based program under the direction of a qualified person.

7.5.2.5.2

Goals established under a performance-based program shall provide assurance that the damper will perform its intended function when exposed to fire conditions.

7.5.2.5.3

Technical justification for inspection, testing, and maintenance intervals shall be documented in writing.

7.5.2.5.4

The performance-based option shall include historical data acceptable to the AHJ.

7.6 Maintenance.

7.6.1

Reports of abrupt changes in airflow or noise from the duct system shall be investigated to verify that it is not related to damper operation.

7.6.2*

All exposed moving parts of the damper shall be lubricated as required by the manufacturer.

7.6.3

If the damper is not operable, repairs shall begin without delay.

7.6.4

Following any repairs, the damper shall be tested for proper operation in accordance with 7.5.2.

7.6.5

Smoke damper actuation shall be initiated at a time interval recommended by the actuator manufacturer.

7.6.6

All maintenance shall be documented and records shall be retained in accordance with 7.5.2.4.

Task Group	Horizontal Opening Protectives [NFPA 80]
Scope	NFPA 80 does not currently address opening protectives which are used for horizontal openings. Review the types of opening protectives and provide recommendation if new requirements or a new type opening protective should be included in NFPA 80.
Recommendation	Create first revision
Additional considerations for the TC	1. Do we need to consider/restrict direction of closure for floor fire door assemblies? 2. Do we need to consider mandating self-closing for floor fire door assemblies? 3. Is positive latching required of all floor fire door assemblies as referenced in 8.1.4 of NFPA 288 or only "where provided"? 4. Consider extracting definition for NFPA 288.

3.3.68 ~~Floor~~ Horizonal Fire Door Assemblies.

A combination of a fire door, a frame, hardware, and other accessories installed in a horizontal plane that together provide a specific degree of fire protection to a through-opening in a fire-resistance-rated floor, floor/ceiling, or roof/ceiling assembly.

16.2.3 ~~Floor~~ Horizontal Fire Door Assemblies.

16.2.3.1

~~Floor~~ Horizontal fire door assemblies shall be tested in accordance with the procedures described in NFPA 288

16.2.3.2

Horizontal fire door assemblies shall be installed in accordance with the manufacturer's installation instructions and the associated listing documents.

16.2.3.3

Horizontal fire door assemblies shall be specifically tested and listed for use in the orientation in which the assembly will be installed.

16.2.3.4

Horizontal fire door assemblies shall bear a label indicating the exposure rating determined by laboratory tests in accordance with NFPA 288.

16.2.3.4.1

The exposure rating shall be for one of the following durations:

(1) 30 minutes
(2) ¾ hour

(3) 1 hour
(4) 1 ½ hours
(5) 2 hours
(6) 3 hours and over (in hourly increments)

16.2.3.4.2

Hourly fire ratings shall be derived with a superimposed load applied to the door assembly as indicated in the individual listings.

21.1.1

This chapter shall cover the installation, inspection, testing, and maintenance of fire protective curtain assemblies installed to protect vertical and horizontal openings.

21.7.6

Fire protective curtain assemblies shall be ~~drop-~~tested for complete closure twice.

21.9.3

Inspection and testing of fire protective curtain assemblies shall be performed by a qualified person.

21.10.5

Maintenance of fire protective curtain assemblies shall be performed by a qualified person.

D.4

Listings are provided for ~~floor~~ horizontal fire door assemblies that are installed in fire-rated floor–ceiling or roof–ceiling assemblies that have been tested in accordance with the methods described in NFPA 288. The listing indicates the fire-rated assembly and the hourly rating (3 hours, 2 hours, 1⁄2 hours, 1 hour, 3⁄4 hour, or 1⁄2 hour) for which the door can be permitted to be used so that access to the space above the ceiling or to the floor above can be provided without adversely affecting the fire resistance rating of the entire assembly. The listing provides limitations on the maximum size of an individual door opening and the total area of all door openings permitted for each 100 ft2 (9.3 m2) of floor or ceiling.

Task Group	Chapter 5 [NFPA 80]
Scope	Chapter 5 is applicable to fire doors, fire shutters, and fire windows. Review each requirement in this chapter to determine the applicability of it to each of these types of opening protectives. Fire shutters, by definition, are a type of fire door, provide recommendation if fire shutters need to be specifically called out.
Recommendation	Create first revision
Substantiation	The requirements have been broken out into separate sections with pointers to where the ITM requirements are located for dampers, fabric fire safety curtains, and fire protective curtain assemblies to make the document more user-friendly.

5.1.1 Application.

5.1.1.1*

This chapter shall cover the inspection, testing, and maintenance of fire doors, fire shutters, fire windows, and opening protectives ~~other than fire dampers, fabric fire safety curtains, and fire protective curtain assemblies~~.

5.1.1.1.1

The inspection, testing, and maintenance of fire dampers shall comply with Chapter 19.

5.1.1.1.2

The inspection, testing, and maintenance of fabric fire safety curtains shall comply with Chapter 20.

5.1.1.1.3

The inspection, testing, and maintenance of fire protective curtain assemblies shall comply with Chapter 21.

Task Group	Signage [NFPA 80]
Scope	Review the requirements for signage on fire in NFPA 80. Review existing provisions to determine if changes are necessary, what constitutes signage (e.g. is a "door wrap" signage), and if these provisions are applicable to all types of doors.
Recommendation	Create First Revision
Substantiation	Due to industry trends with signage applied to fire doors, the TC of NFPA 80 commissioned a Task Group to review the requirements for signage on fire doors in NFPA 80, and determined the submitted changes are necessary to provide the needed guidance. Additionally, the TG commission was to determine what constitutes signage (e.g. is a "door wrap" signage), and include these provisions where applicable to all types of fire doors.

4.1.3 Signage.

Informational signs, advertising, decorative signage, and cladding shall be permitted to be installed on the surfaces of fire doors in accordance with 4.1.3.1 through 4.1.3.4.5 or in accordance with the manufacturer's published listing.

4.1.3.1 Allowable Area.

The total area of all attached signs shall comply with the following:

(1) Signage comprising combustible materials shall not exceed 5 percent of the area of the face of the fire door.

(2) Signage that is painted on with stencils or other similar methods shall not be limited in area.

(3) Vinyl signage up to 0.008 in. (0.2 mm) in thickness shall not exceed 5 percent of the area of the face of the fire door.

(4) Metal signage up to 20 gauge thickness shall not exceed 200 $in.^2$ (0.13 m^2).

4.1.3.2 Means of Attachment.

4.1.3.2.1

Signs shall be attached to fire doors by use of an adhesive.

4.1.3.2.2

Mechanical attachments such as screws or nails shall not be permitted, unless otherwise permitted by 4.1.3.2.3.

4.1.3.2.3

Up to four steel or stainless steel sheet metal screws up to U.S. size #8 (4.2 mm) or up to four other steel fasteners not exceeding 0.17 in. (4.2 mm) shall be permitted to penetrate one side of a fire door to attach metal signs.

4.1.3.3

Signs shall not be installed on glazing in fire doors.

4.1.3.4

Signs shall not be installed on the surface of fire doors in such a way that impairs or otherwise interferes with the proper operation of the fire door.

4.1.3.5* Cladding.

4.1.3.5

Polyester or PVC cladding shall be permitted to be installed on fire doors in accordance with 4.1.3.5.

A.4.1.3.5

Polyester or PVC cladding can be installed on all types of fire doors including rolling steel fire doors and elevator hoistway doors.

4.1.3.5.1

Polyester or PVC cladding materials shall not be installed fire doors rated for more than ¾ hour.

4.1.3.5.2

Polyester or PVC cladding material shall be listed and installed in accordance with the manufacturer's installation instructions.

4.1.3.5.3

Inspection, testing, and maintenance of cladding materials shall comply with the applicable Chapter 5.

4.1.3.5.4

Where no requirements for installation, testing, or maintenance exist in Chapter 5, the cladding shall meet the manufacturer's installation requirements for a new installation.