



Public Input No. 1-NFPA 4-2024 [Section No. 4.1.3]

4.1.3

Integrated testing of new or existing fire protection and life safety systems shall be performed where required by the design documents, commissioning plan, owner's project requirements (OPR), or governing laws, codes, regulations, or standards.

Statement of Problem and Substantiation for Public Input

Incorporating the Owner's Project Requirements (OPR) into section 4.1.3 of NFPA 4 2024 enhances the alignment of integrated testing with the project's documented expectations, improves accountability and documentation, ensures consistency with commissioning practices, facilitates communication and coordination among stakeholders, and helps meet legal and regulatory requirements. This addition supports a more thorough and effective testing process, ultimately leading to improved safety and performance of fire protection and life safety systems.

Many jurisdictions and regulatory bodies require adherence to the owner's documented requirements as part of the project's compliance criteria. Including the OPR in section 4.1.3 ensures that the integrated testing is in line with these legal and regulatory obligations.

Submitter Information Verification

Submitter Full Name: Steven Winstead
Organization: NEMI
Street Address:
City:
State:
Zip:
Submittal Date: Tue May 14 17:21:06 EDT 2024
Committee: CMI-AAA

Committee Statement

Resolution: The owners project requirements are specific to the commissioning of a building and not a document required for integrated testing or for AHJ's to use.



Public Input No. 10-NFPA 4-2024 [Section No. 4.3.2]

4.3.2

~~Team members~~ The integrated system testing team shall provide evidence of their qualifications when requested by the authority having jurisdiction.

Statement of Problem and Substantiation for Public Input

With the proposed change in language, it would provide more consistency within this document.

Submitter Information Verification

Submitter Full Name: Kevin Convy
Organization: Sprinkler Fitters Local 268
Affiliation: United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada
Street Address:
City:
State:
Zip:
Submittal Date: Mon Jun 03 11:21:06 EDT 2024
Committee: CMI-AAA

Committee Statement

Resolution: FR-1-NFPA 4-2024

Statement: The language provides more consistency within this document.



Public Input No. 9-NFPA 4-2024 [Section No. 4.3.2]

4.3.2

Team members shall provide evidence of their qualifications when requested by the authority having jurisdiction - and be certified to perform testing, adjusting, and balancing of Heating, Ventilation, and Air Conditioning Systems through a certification body accredited under the ISO/IEC 17024 Personnel Certification standard

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
Why_ISO_IEC_17024_is_Critical_for_the_D...pdf	Why Iso/iec is important	
ISO_17024_2012.pdf	ISO/IEC 17024	

Statement of Problem and Substantiation for Public Input

Adding the requirement for team members to have certifications as smoke control system technicians and fire and smoke damper technicians under ANAB ISO 17024 ensures a high level of expertise and competence in critical life safety systems. These certifications, supported by standards such as NFPA 92, NFPA 80, and NFPA 105, verify that technicians have the specialized knowledge needed to install, inspect, and maintain smoke control systems and dampers, which are crucial for preventing fire and smoke spread. This addition aligns with industry best practices and enhances safety and compliance, providing assurance to the Authority Having Jurisdiction (AHJ) of the team members' qualifications.

Submitter Information Verification

Submitter Full Name: Steven Winstead
Organization: NEMI
Street Address:
City:
State:
Zip:
Submittal Date: Thu May 30 13:28:02 EDT 2024
Committee: CMI-AAA

Committee Statement

Resolution: This requirement is too specific for the entire integrated testing team. The team includes several different professions outside of just HVAC. This information may be better suited in the annex for recommended certifications for testing, adjusting, and balancing professionals.



Public Input No. 3-NFPA 4-2024 [Section No. 4.5.3.1]

4.5.3.1

If an integrated system test plan is not required, integrated system testing ~~is~~ shall still be required.

Statement of Problem and Substantiation for Public Input

A shall statement is currently missing from this subsection.

Submitter Information Verification

Submitter Full Name: Joe Scibetta

Organization: BuildingReports

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 29 10:35:58 EDT 2024

Committee: CMI-AAA

Committee Statement

Resolution: FR-2-NFPA 4-2024

Statement: A shall statement is currently missing from this subsection, this aligns the requirement with NFPA's Manual of Style.



Public Input No. 4-NFPA 4-2024 [Section No. 5.1.2.4 [Excluding any Sub-Sections]]

Where the risk assessment identifies possible hazards to the building, contents, or operations, the owner shall be notified in writing.

Statement of Problem and Substantiation for Public Input

Minor grammatical correction with the inclusion of a needed comma.

Submitter Information Verification

Submitter Full Name: Joe Scibetta

Organization: BuildingReports

Street Address:

City:

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Submittal Date: Wed May 29 10:39:31 EDT 2024

Committee: CMI-AAA

Committee Statement

Resolution: [FR-3-NFPA 4-2024](#)

Statement: Minor grammatical correction with the inclusion of a needed comma.



Public Input No. 2-NFPA 4-2024 [Section No. 5.1.2.4.2]

5.1.2.4.2

Where the owner chooses to accept the risk, the test plan shall record the decision. The owner shall also report this decision to the authority having jurisdiction (AHJ).

Statement of Problem and Substantiation for Public Input

NFPA 4 requires that integrated testing comply with applicable laws, regulations, and standards. Including the requirement to report risk acceptance decisions to the AHJ ensures adherence to local and national regulatory frameworks, providing a clear audit trail for compliance verification.

Submitter Information Verification

Submitter Full Name: Steven Winstead

Organization: NEMI

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 15 12:04:17 EDT 2024

Committee: CMI-AAA

Committee Statement

Resolution: The AHJ already reviews the test plan, therefore, any risk the owner chooses will be reviewed by the AHJ. Section 7.4.3 states that this information is provided to the AHJ upon their request.



Public Input No. 11-NFPA 4-2024 [New Section after 5.2.12]

5.3 Automated Testing and Remote Inspections

Automated testing and remote inspections or testing shall be permitted in accordance with NFPA 915.

Statement of Problem and Substantiation for Public Input

NFPA 915 addresses the use of remote and automated inspections and tests. It provides for consistent application, establishes expectations around certain roles and responsibilities, addresses important factors like data formatting and custody of records, etc. Technology around these practices is evolving at a rapid pace and will undoubtedly impact NFPA 3 & 4. The standard(s) should recognize this and provide a link to NFPA 915.

Submitter Information Verification

Submitter Full Name: Jason Webb
Organization: Potter Electric Signal Company
Affiliation: Automatic Fire Alarm Association (AFAA) Codes and Standards Committee
Street Address:
City:
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Submittal Date: Tue Jun 04 14:12:01 EDT 2024
Committee: CMI-AAA

Committee Statement

Resolution: CI-4-NFPA 4-2024

Statement: The technical committee requests input from the public on the inclusion of NFPA 915 into NFPA 4. The committee is explicitly looking for how NFPA 915 can be used responsibly during an integrated test.



Public Input No. 5-NFPA 4-2024 [Section No. 6.4.3]

6.4.3*

In addition to known changes, 10 percent of the devices, up to a maximum of 50- ~~devices~~ , that are performing the unaffected input functions of each integrated system that has been changed, shall be tested to verify correct operation or non-operation of the other integrated systems.

Statement of Problem and Substantiation for Public Input

Minor restructuring for better readability.

Submitter Information Verification

Submitter Full Name: Joe Scibetta

Organization: BuildingReports

Street Address:

City:

State:

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Submittal Date: Wed May 29 10:48:03 EDT 2024

Committee: CMI-AAA

Committee Statement

Resolution: [FR-5-NFPA 4-2024](#)

Statement: Minor restructuring for better readability.



Public Input No. 6-NFPA 4-2024 [Section No. 7.1.4]

7.1.4

Upon completion of testing, the integrated testing agent (ITa) shall submit a final report to the owner stating that the integrated system has been tested in accordance with the approved test plan, if such was required, and/or this standard.

Statement of Problem and Substantiation for Public Input

Test plans are not required for limited integrated systems, per Chapter 4. This section has been edited accordingly to make it clearer that documentation may or may not refer to an approved test plan, depending on whether one was required or not.

Submitter Information Verification

Submitter Full Name: Joe Scibetta

Organization: BuildingReports

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 29 10:52:47 EDT 2024

Committee: CMI-AAA

Committee Statement

Resolution: [FR-6-NFPA 4-2024](#)

Statement: The changes made increase the readability of the section and align with the manual of style.



Public Input No. 7-NFPA 4-2024 [Section No. A.3.3.13.1.3]

A.3.3.13.1.3 Integrated Test. [🔗](#)

Integrated testing can include other building systems integrated into fire protection and life safety systems, such as elevator recall or HVAC control. Integrated tests might also be referred to as end-to-end integrated system tests. An integrated test might include activation of all individual system inputs and observation of all individual system responses or outputs, or it might only test specific inputs and outputs or responses from control group testing.

~~Anything other than an~~ It should be noted, though, that not all integrated tests are end-to-end integrated ~~test is not considered an integrated test tests~~. For example, consider an integrated system consisting of a fire alarm system and an elevator system. An end-to-end integrated test would require that the fire alarm smoke detector be activated and the elevator be observed to respond to the signal by returning to a specific location, parking properly, and opening the elevator doors. ~~Testing~~ However, testing the interface between the two systems by using a menu command on the fire alarm system to activate the interface device — a relay powered by the fire alarm system and interfaced to the elevator controller — is not an end-to-end test. The elevator might be observed to return, but the test did not originate at the fire alarm initiating device. This test method could be helpful to quickly verify that the physical interface is properly connected, but it does not test the fire alarm programming to verify a representation of a real-world event. Therefore, it is not an end-to-end integrated test.

Statement of Problem and Substantiation for Public Input

Adjustments made for better readability and comprehension. This better clarifies that not all integrated tests are end-to-end integrated tests.

Submitter Information Verification

Submitter Full Name: Joe Scibetta

Organization: BuildingReports

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 29 11:11:12 EDT 2024

Committee: CMI-AAA

Committee Statement

Resolution: The changes do not help the readability of the annex material as the annex material is already confusing. The proposed edits change the intent that the annex material is covering. A task group has been established to review the definitions for section 3.3.13 and how they are used in the standard to better clarify the definitions and the annex material.



Public Input No. 8-NFPA 4-2024 [Section No. A.4.5.1]

A.4.5.1

The documentation for existing systems can be different from that for new systems and might include past test reports and information about prior editions of applicable standards. ~~For an existing system, the documentation required might include past test reports. In~~ In addition, documentation can differ if acceptance testing is performed simultaneously with integrated system testing. Where acceptance testing of individual systems occurs prior to integrated system testing, the documentation might be required to include copies of the test documentation required by the individual standards.

Statement of Problem and Substantiation for Public Input

This strike-through appears to be repetitive, as the first sentence already mentions the possible inclusion of past test reports.

Submitter Information Verification

Submitter Full Name: Joe Scibetta

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Street Address:

City:

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Zip:

Submittal Date: Wed May 29 11:44:48 EDT 2024

Committee: CMI-AAA

Committee Statement

Resolution: FR-7-NFPA 4-2024

Statement: The first sentence already mentions the possible inclusion of past test reports, the deleted text is redundant.