NFPA 72- 2025 Edition
National Fire Alarm and Signaling Code®
TIA Log No.: 1898
Reference: 2.3.11
Comment Closing Date: June 2, 2026
Submitter: Megan Hayes, National Electrical Manufacturers Association
www.nfpa.org/72

1. Revise paragraph 2.3.11 to read as follows:

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

UL 217, *Smoke Alarms*, 2020, revised 2022.
UL 268, *Smoke Detectors for Fire Alarm Systems*, 2023.
UL 827, *Central-Station Alarm Services*, 2014, revised 2021.
UL 864, *Control Units and Accessories for Fire Alarm Systems*, ~~2022, revised 2023.~~2014, revised 2020.

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Substantiation: The intent of the reference for UL 864 that appears in the 2025 edition of NFPA 72 (UL 864 dated 2022, revised 2023) was to reference what is known as the most recent version or the 11th edition of the standard. This revised version is a harmonized standard between US (UL 864) and Canada (ULC 527). The ultimate goal of the 11th edition harmonized standard was to create a version without any changes to country specific requirements. The most recent 11th edition of UL 864 was published by UL Standards and Engagement on October 9, 2023 following its normal consensus development process. However, UL Solutions has determined that errors in the most recent 11th edition inhibit adequate testing and certification. One key issue is that, as written, Canadian requirements would also apply to US products and therefore require retesting of products – which was not the intent of the UL 864 technical committee. Also, conflicting construction and ratings requirements make compliance to both US and Canada impossible.

These issues and others create a conflict in the marketplace as NFPA 72 2025 requires UL 864 11th edition Listed products, yet third party certifiers will be challenged in evaluating products to the currently referenced edition until corrections are made. UL Solutions has submitted proposals to address the errors. Until the corrections are published, it is critical that NFPA 72 2025 revert to UL 864, 10th edition dated 2014, revised 2020, This is essential to 1) allow time for the proposed standard corrections to go through the process and 2) to allow manufacturers time to be evaluated to the new (corrected) requirements, and 3) give time for manufacturers to get compliant products into production and provide products to the marketplace.

Emergency Nature: The standard contains an error or an omission that was overlooked during the regular revision process. The proposed TIA intends to correct a circumstance in which the revised NFPA Standard has resulted in an adverse impact on a product or method that was inadvertently overlooked in the total revision process or was without adequate technical (safety) justification for the action.

As of January 1, 2026, adoption of NFPA 72 2025 as currently written will require 11th edition products, which are not available in the market. This will severely restrain the ability of new installations in the field. Testing Organizations should not test to the 11th edition due to the errors and omissions in requirements that make testing and construction review impossible. UL put a hold on testing to the 11th edition until the errors within are corrected.

Anyone may submit a comment by the closing date indicated above. Please identify the TIA number, state whether you SUPPORT or OPPOSE the TIA along with your comment, and forward to the Secretary, Standards Council. SUBMIT A COMMENT