

NFPA 72®-2022 and Proposed 2025 Editions

National Fire Alarm and Signaling Code®

TIA Log No.: 1773

Reference: 29.3.4

Comment Closing Date: May 13, 2024

Submitter: Dan Gauvin, Templeton, MA

www.nfpa.org/72

Proposed wording for the current 2022 edition:

1. Revise section 29.3.4 to read as follows:

29.3.4* Supplementary Functions.

A.29.3.4 Supplementary functions include, but are not limited to, the extension of an alarm beyond the residential occupancy and monitoring of other safety systems.

29.3.4.1 Supplementary functions, including the extension of an alarm beyond the residential occupancy, shall be permitted.

29.3.4.2 Supplementary functions and shall not interfere with the performance requirements of this chapter.

29.3.4.3 Supplementary functions shall not be required to be supplied with a secondary power source.

Proposed wording for the proposed 2025 edition:

1. Revise section 29.3.4 to read as follows:

29.3.4* Supplementary Functions.

A.29.3.4 Supplementary functions include, but are not limited to, the extension of an alarm beyond the installed location and monitoring of other safety systems.

29.3.4.1 Supplementary functions, including the extension of an alarm beyond the installed location, shall be permitted.

29.3.4.2 Supplementary functions shall if they do not interfere with the performance requirements of this chapter.

29.3.4.3 Supplementary functions shall not be required to be supplied with a secondary power source.

Substantiation:

Submitter's Notes: *In a discussion with a Technical Committee member of Chapter 29, it was expressed to me that the committee attempts to identify what can be done, not what cannot be done. I understand this makes sense in most cases; however, exceptions are applied where needed and appropriate. The proposed legislative text above would not break precedent within Chapter 29; i.e.*

- ***Per Section 29.9.6, Visual Notification Appliance (with Single- or Multiple-Station Alarm).*** *If a visual notification appliance is used in conjunction with a single- or multiple-station alarm for compliance with 29.5.8, the notification appliance shall not be required to be supplied with a secondary power source.*

Also, the proposed changes add annex material for compliance with the Manual of Style; whereas, the example of “the extension of an alarm beyond the residential occupancy (or installed location)” has been relocated from legislative text to the annex.

Problem (substantiation statement): Batteries in single- and multiple-station alarms supply the alarm devices with secondary power to provide the detection and occupant notification requirements of Chapter 29; however, the batteries are not capable of providing sufficient secondary power to operate alarm device relay modules for supplementary functions. NFPA 72, Chapter 29, lacks legislative text regarding secondary power requirements for supplementary functions (an omission).

Actual Field Problem: I own a home that was originally built with hardwired multiple station smoke alarm devices installed with 9-volt battery backup. I have since had a combination fire/burglary panel installed to add burglary protection and off-premise notification to a supervising station.

The existing multiple-station smoke alarms provide the detection coverage and occupant notification within the dwelling as required by NFPA 72, Chapter 29.

As the building owner, I want to add a “supplementary” interconnection from a listed multiple-station smoke alarm relay module to my fire/burg control unit. The supplementary relay interface would provide increased life safety protection for my family by initiating an alarm on the control unit to:

- a) Provide a much higher audible dB level for the occupant notification within the dwelling, emanating from the control unit’s notification appliance installed in the dwelling unit (supplementing the installed smoke alarm audible occupant notification required by code), and
- b) Provide off-premise notification to a supervising station to initiate a fire department response, allowing for a significantly higher potential to save lives should a fire occur that would trap the occupants.

Both **a)** and **b)** above are “supplementary (nonrequired)” functions desired by the owner. These “supplementary” functions go beyond the minimum requirements of Chapter 29, without affecting the required operations or performance.

- The system installer has taken the position that the relay interface connection to the control unit is not allowed by code because smoke alarm relay modules do not operate on battery power.
- As the building owner, I have the position that the relay interface connection to the control unit is a “supplementary (nonrequired)” function, and in accordance with the definition of “Nonrequired”:
 - A nonrequired function added for the purpose of meeting site-specific needs or objectives of the building owner should not trigger additional requirements, such as the need to operate on secondary power (ref: NFPA 72 Sections 3.3.187 and A.3.3.187, SIG-FUN).

I did receive a mostly favorable informal interpretation from NFPA staff, unfortunately, it includes too much unenforceable language to convince my installer or an AHJ.

- The installer is sympathetic but unwilling to risk taking my view (as would likely be the position of the AHJ). I understand, both the installer and the AHJ will not risk allowing anything that is not explicitly allowed by the code.

However, from an owner’s perspective, it is all upside benefit, with absolutely no risk, i.e.

- When commercial light and utility power is available (99.xx percent of the time), the level of protection and system functionality would be greatly enhanced.

- When commercial light and utility power is NOT available (an extremely small percentage of time), all code required functionality and protection is provided by the installed multiple-station smoke alarms.

These benefits would appear to be consistent with the Chapter 3 definition of “Nonrequired” and the intent of “Nonrequired” functions permitted in the code. Correlation with both SIG-HOU and SIG-FUN technical committees may be required.

Emergency Nature: The standard contains an error or an omission that was overlooked during the regular revision process. The NFPA Standard contains a conflict within the NFPA Standard or within another NFPA Standard.

When the ability to increase occupant life safety and save a life (or lives) is being prevented due to an omission in the code, it should be considered emergency in nature and allowed to be corrected through the TIA process.

TIA Emergency Nature, Basis #1 – Omission in the Code [Section 5.4(a), Regulations Governing the Development of NFPA Standards]:

- NFPA 72, Chapter 29, lacks legislative text regarding secondary power requirements for supplementary functions (an omission).
 - This omission has resulted in a potential misinterpretation of the code, which is preventing a nonrequired function desired by the building owner, for the purpose of providing an increased level of life safety for the building occupants from being permitted.
 - In a recent request for Formal Interpretation:
 - 7 of 16 SIG-HOU Technical Committee members balloted stated secondary power is not required for supplementary functions (the highest percentage of responses).
 - There was no consensus from the remainder of the committee, i.e., of the 9 additional ballot votes, no more than 2 stated the same reason for their ballots.
 - However, 2 members did state that it “involves subjects that were not previously considered by the technical committee or that are not addressed in the NFPA Standard” (i.e. an omission).
 - If according to the FI responses roughly half the SIG-HOU Technical Committee is unable to answer yes or no, as to whether supplementary functions need to operate on or be supplied with secondary power, then system designers, installers, and AHJs cannot be expected to properly interpret and apply the code related to this omission.

TIA Emergency Nature, Basis #2 – Conflict in the Code [Section 5.4(b), Regulations Governing the Development of NFPA Standards]:

- A requirement for supplementary functions to operate on or be supplied with secondary power would create correlation conflicts with **Chapter 3 Definitions**:
 - By definition, all “supplementary” functions are “nonrequired” functions (**ref: 3.3.307 Supplementary definition**)

- A “nonrequired” function is a function added for the purpose of meeting site-specific needs or objectives of the building owner (**ref: 3.3.187 Nonrequired definition**)
- A “nonrequired” function should not trigger additional requirements (*note: such as the need to operate on or be supplied with secondary power*) (**ref: A.3.3.187 Nonrequired annex material**)
- A requirement for supplementary functions to operate on or be supplied with secondary power would create multiple conflicts with other **sections of Chapter 29**:
 - **29.10.7.8*** permits the connection of single- or multiple-station alarms with other input or output devices, such as relay modules. However, the battery that provides secondary power to operate single- or multiple-station alarm devices does not provide sufficient power to operate the alarm device relay module for supplementary functions.
 - **29.10.7.8.2** permits single- or multiple-station smoke alarms to be connected to system control equipment located within the dwelling unit. However, the only means to connect single- or multiple-station alarms to a system control unit is through the alarm device relay module interface, which will not operate on secondary power.
 - **29.10.9.1.1** permits transmission of signals from single- and multiple-station alarms to a constantly attended supervising station or public emergency alarm reporting system through a household alarm system. However, the only means of transmitting signals from single- or multiple-station alarms to a supervising station or public emergency alarm reporting system is via an alarm device relay module interface (which will not operate on secondary power) to the household alarm system.
 -

To mitigate this omission and potential conflicts in the code, Chapter 29 needs to specify supplementary functions are not required to be supplied with secondary power.

Attachment:

72_2022_SIG_HOU_Chapter29_FI_ballot_final.pdf (Formal Interpretation Ballot Results)

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](#)



NATIONAL FIRE PROTECTION ASSOCIATION

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

MEMORANDUM

TO: Technical Committee on Single- and Multiple-Station Alarms and Household Signaling Systems

FROM: Jenny Depew, *Committee Administrator*

DATE: November 16, 2023

SUBJECT: **FINAL RESULTS** – Formal Interpretation Ballot NFPA 72, Ch.29

According to the final ballot results, the ballot **did not receive** the required $\frac{3}{4}$ majority agreement in favor of either a yes or no answer on **both** the Interpretation Request and the Prevailing Answer. (See *Regs.* 6.3.4(b)).

20 Members Eligible to Vote
4 Ballots Not Returned (*Mills, Murphy, Simpson, Wray*)

Interpretation Request:

8 No, this FI should not be processed.
 (w/ comment: *Gifford, Hansen, Jakusz, Ratzlaff*)

8 Yes, this FI should be processed.

Prevailing Answer:

1 Yes (w/comment, *Dedear*)

7 No (w/ comment: *Christian, Gottuk, Miller, Ogle, Olenick, Sacco, Schmidt*)

0 Abstentions

To pass ballot this requires: (1) a simple majority of the members eligible to vote must vote in favor of the prevailing yes or no answer, (2) a three quarters majority agreement in favor of either a yes or no answer posed in the interpretation request. [See *Regs* 6.3.4 (b).]

(1) In all cases, at least a simple majority of the total membership eligible to vote must vote in favor of the prevailing yes or no answer. For the prevailing answer:

$$[20 \text{ eligible} \div 2 = 10 + 1 = \mathbf{(11)}]$$

(2) At least three quarters of the voting members must vote in favor of the prevailing yes or no answer. For the prevailing answer:

$$[20 \text{ eligible to vote} - 4 \text{ not returned} - 0 \text{ abstentions} = 16 \times 0.75 = \mathbf{(12)}]$$

Final ballot comments on the Formal Interpretation are attached.

Technical Committee on Single- and Multiple-Station Alarms and Household Signaling Systems
LETTER BALLOT on Formal Interpretation of
Chapter 29 of NFPA 72, 2022 Edition, *National Fire Alarm and Signaling Code*®

With respect to the submitted Formal Interpretation question below, please provide your vote to process, not process, or that you wish to abstain.

Question:

Is a single or multiple-station smoke alarm relay module required to operate on secondary power when used to provide a “supplementary function”?

1. A Formal Interpretation **should not be processed** because (a) a yes or no answer would not provide clarification or (b) due to one or more of the factors indicated in 6.1.5 of the *Regulations Governing the Development of NFPA Standards*, as indicated below:
- (a) Involves a determination of compliance of a design, installation, product or equivalency of protection
 - (b) Involves a review of plans or specifications, or requires judgment or knowledge that can only be acquired as a result of on-site inspection
 - (c) Involves text that clearly and decisively provides the requested information
 - (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See Regs at 6.1.5)

Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

OR

3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE: 

PRINT NAME: George Bish

DATE: 11/10/2023

Vote changes/ballots must be submitted no later than **Wednesday, November 15, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

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 - (c) Involves text that clearly and decisively provides the requested information
 - (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: (b) Involves a review of plans or specifications, or requires judgment or knowledge that can only be acquired as a result of on-site inspection

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:
- Yes No

Explanation of Vote – Please type or print your comments:

OR

3. **Abstain**

Explanation of Vote – Please type or print your comments:

SIGNATURE: _____  _____

PRINT NAME: __ Thomas Cleary _____

DATE: _11/7/2023_____

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

Technical Committee on Single- and Multiple-Station Alarms and Household Signaling Systems
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 - (c) Involves text that clearly and decisively provides the requested information
 - (d) **Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See Regs at 6.1.5)**

Recommend: _____

Comments: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:
- Yes No

Explanation of Vote – Please type or print your comments:

OR

3. **Abstain**

Explanation of Vote – Please type or print your comments:

SIGNATURE: _____

PRINT NAME: Wendy Gifford

DATE: October 31, 2023

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

Technical Committee on Single- and Multiple-Station Alarms and Household Signaling Systems
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With respect to the submitted Formal Interpretation question below, please provide your vote to process, not process, or that you wish to abstain.

Question:

Is a single or multiple-station smoke alarm relay module required to operate on secondary power when used to provide a "supplementary function"?

1. A Formal Interpretation **should not be processed** because (a) a yes or no answer would not provide clarification or (b) due to one or more of the factors indicated in 6.1.5 of the *Regulations Governing the Development of NFPA Standards*, as indicated below:
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 - (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: (a) Involves a determination of compliance of a design, installation, product or equivalency of protection

Comments, if any: Although 29.10.7.8 does state "other input or output devices shall be permitted" and a relay module is mentioned in A.29.10.7.8, the installation requirements for a relay module are not covered in Chapter 29.

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

OR

3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE: Greg Hansen

PRINT NAME: Greg Hansen

DATE: Nov. 7, 2023

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

Technical Committee on Single- and Multiple-Station Alarms and Household Signaling Systems
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- (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: since "supplementary function" covers such a large scope, it is impossible to determine if that function would need to work 100% of the time

Comments, if any: _____

OR



2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

OR



3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE: Matthew J. Jakusz

PRINT NAME: Matthew B. Jakusz

DATE: 11/7/2023

Your ballot must be received at NFPA no later than Tuesday, November 7, 2023. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

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- (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: _____

Comments, if any: _____

OR



2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

OR



3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE: _____

PRINT NAME: JEFFERY MYBRIDE

DATE: 11/3/23

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org

Technical Committee on Single- and Multiple-Station Alarms and Household Signaling Systems
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With respect to the submitted Formal Interpretation question below, please provide your vote to process, not process, or that you wish to abstain.

Question:

Is a single or multiple-station smoke alarm relay module required to operate on secondary power when used to provide a “supplementary function”?

1. A Formal Interpretation **should not be processed** because (a) a yes or no answer would not provide clarification or (b) due to one or more of the factors indicated in 6.1.5 of the *Regulations Governing the Development of NFPA Standards*, as indicated below:
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 - (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

OR

3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE: _____

PRINT NAME: Jeffrey L Oken

DATE: 11/5/23

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

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Recommend: A yes or no answer would not provide clarification

Comments, if any: __

Secondary power may be desired for functional safety of a critical function. In this case, we are talking about a supplemental function. Supplemental functions are optional and not required/mandated by the code. Supplemental also indicates that it is not a safety-critical function. Implementing this as a mandatory requirement would require redesign of existing products, which is not a desirable outcome by us as a manufacturer of products.

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:
- Yes No

Explanation of Vote – Please type or print your comments:

OR

3. **Abstain**

Explanation of Vote – Please type or print your comments:

SIGNATURE: _____  _____

PRINT NAME: _____ Larry Ratzlaff _____

DATE: _____ 10/31/2023 _____

Technical Committee on Single- and Multiple-Station Alarms and Household Signaling Systems
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- (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

To provide guidance for the AHJ with enforcement of the code.

OR

3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE: *Tim DeDean*

PRINT NAME: Tim DeDean

DATE: 10/31/2023

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

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- (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

Currently Chapter 29 does not specifically require secondary power for relay modules but paragraph 29.10.7.8.3 states that when connected to a control unit the actuation of a single- or multiple-station alarm shall initiate an alarm at the control unit. This implies that the relay module will operate with or without primary power.

OR

3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE:  _____

PRINT NAME: David Chrisitan

DATE: 11/07/2023

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

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 - (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:
- Yes No

Explanation of Vote – Please type or print your comments:

___A supplementary function is not required and thus does not require a secondary power source__

OR

3. **Abstain**

Explanation of Vote – Please type or print your comments:

SIGNATURE: 

PRINT NAME: Daniel Gottuk

DATE: 11-8-23

Vote changes/ballots must be submitted no later than **Wednesday, November 15, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

Technical Committee on Single- and Multiple-Station Alarms and Household Signaling Systems
LETTER BALLOT on Formal Interpretation of
Chapter 29 of NFPA 72, 2022 Edition, *National Fire Alarm and Signaling Code*®

With respect to the submitted Formal Interpretation question below, please provide your vote to process, not process, or that you wish to abstain.

Question:

Is a single or multiple-station smoke alarm relay module required to operate on secondary power when used to provide a “supplementary function”?

1. A Formal Interpretation **should not be processed** because (a) a yes or no answer would not provide clarification or (b) due to one or more of the factors indicated in 6.1.5 of the *Regulations Governing the Development of NFPA Standards*, as indicated below:
- (a) Involves a determination of compliance of a design, installation, product or equivalency of protection
 - (b) Involves a review of plans or specifications, or requires judgment or knowledge that can only be acquired as a result of on-site inspection
 - (c) Involves text that clearly and decisively provides the requested information
 - (d) Involves subjects that were not previously considered by the TC or that are not addressed in the Document (See *Regs* at 6.1.5)

Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments: As noted in 29.9.6 (2022 edition) Usual notification appliances are not required to be supplied with a secondary power source. Since the relay module is used to “provide a ~~secondary~~ ‘supplementary function’”, I believe the same position should apply. No

OR secondary power source is required.

3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE: Thomas A. Miller, PE

PRINT NAME: Thomas H. Miller, PE

DATE: 11/1/2023

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

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Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation should be processed and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

BY DEFINITION, "SUPPLEMENTARY" IS NOT REQUIRED & THEREFORE DOES NOT NEED TO OPERATE ON SECONDARY POWER

OR

3. Abstain

Explanation of Vote – Please type or print your comments:

SIGNATURE: _____

PRINT NAME: CORY OGLE

DATE: 2023-10-26

Your ballot must be received at NFPA no later than Tuesday, November 7, 2023. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

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Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

Per 29.3.4, supplementary functions are permitted so long as they do not interfere with the performance requirements of the remainder of Chapter 29. There are no requirements in Chapter 29 for secondary power for relay modules for single- and multiple-station smoke alarms. Therefore, it is not required by NFPA 72. Other laws/codes/standards, including product standards, may require it and should be consulted.

OR

3. **Abstain**

Explanation of Vote – Please type or print your comments:

SIGNATURE: _____

PRINT NAME: Stephen Olenick

DATE: 11/1/2023

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Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

Currently Chapter 29 does not specifically require secondary power for smoke alarms that are connected to a control unit. Paragraph 29.10.7.8.3 states that when smoke alarms are connected to a control unit, they shall initiate an alarm at the control unit. This implies that the relay module will always operate, not just under primary power. This gap needs to be addressed during the revision cycle for the 2028 edition

OR

3. **Abstain**

Explanation of Vote – Please type or print your comments:

SIGNATURE: _____

PRINT NAME: Eric Sacco

DATE: Nov. 07, 2023

Your ballot must be received at NFPA no later than **Tuesday, November 7, 2023**. Please return ballots to Jenny Depew via e-mail to: jdepew@nfpa.org.

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Recommend: _____

Comments, if any: _____

OR

2. A Formal Interpretation **should be processed** and my answer to the question presented above is:

Yes No

Explanation of Vote – Please type or print your comments:

A relay providing supplementary is not required, therefore battery backup is not required

OR

3. **Abstain**

Explanation of Vote – Please type or print your comments:

SIGNATURE:  _____

PRINT NAME: Robert Schmidt

DATE: 11/14/23