



NATIONAL FIRE PROTECTION ASSOCIATION

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

AGENDA

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

Tuesday, October 6, 2020 10:00 a.m. – 2:30 p.m. (ET)
Wednesday, October 7, 2020 10:00 a.m. – 2:30 p.m. (ET)
Thursday, October 8, 2020 10:00 a.m. – 2:30 p.m. (ET)

Web Conference

1. **Call to order.** Call meeting to order by Chair Keith Pardoe at 10:00 a.m. (ET) via web conference.
2. **Attendance.** For current committee roster see page 2.
3. **Chair remarks.** K. Pardoe.
4. **Approval of November 13-14, 2019 First Draft Meeting Minutes.** See page 7.
5. **Staff liaison presentation.** G. Harrington. See page 12.
6. **NFPA 105 Second Draft Preparation.** For public comment, see page 27, for committee input, see page 29.
7. **NFPA 80 Second Draft Preparation.** For public comments, see page 31, for committee inputs, see page 140.
8. **Task Group and Committee Member Reports.**
 - a. Task Group B. Fire and smoke damper remote inspection requirements in NFPA 80 and NFPA 105. Chair M. Gissel.
 - b. Task Group C. Review of NFPA 80, Chapter 4 requirements. Chair J. Rice.
 - c. Task Group A. Field labeling provisions in NFPA 80. Chair J. Rice.
 - d. Task Group D. Review of NFPA 80 editorial changes. Chair K. Pardoe.
 - e. Signage. Review of first revisions made to signage provisions. B. Campbell.
9. **Other Business.**
10. **Next Meeting.**
11. **Adjournment.**

Address List No Phone

08/17/2020

Jen Sisco

FDW-AAA

Fire Doors and Windows

Keith E. Pardoe Chair Pardoe Consulting LLC 15191 Montanus Drive, Unit 135 Culpeper, VA 22701	SE 4/15/2004 FDW-AAA	Chad E. Beebe Principal ASHE - AHA PO Box 5756 Lacey, WA 98509-5756	U 10/20/2010 FDW-AAA
Joanna Blaney Principal FM Global FM Approvals 1151 Boston-Providence Trnpk Norwood, MA 02062 Alternate: William Skene	I 12/06/2019 FDW-AAA	Bruce G. Campbell Principal JENSEN HUGHES 112 Rancho Bueno Drive Georgetown, TX 78628-9523 Alternate: David V. Tomecek	SE 4/3/2003 FDW-AAA
William Conner Principal Bill Conner Associates LLC 15160 Valley Drive Clayton, NY 13624 American Society of Theater Consultants	SE 4/3/2003 FDW-AAA	David Dawdy Principal Cornell Iron Works, Inc. 24 Elmwood Avenue Mountaintop, PA 18707-2100 International Door Association Alternate: Garry Stewart	IM 07/29/2013 FDW-AAA
Luc Durand Principal Saskatoon Fire Department Prevention and Investigation Division 125 Idylwyld Drive South Saskatoon, SK S7M 1L4 Canada Alternate: Daisy R. Harington	E 10/23/2013 FDW-AAA	David Feist Principal ANSI National Accreditation Board (ANAB) 1899 L St. NW 11th Floor Washington, DC 20036	U 04/02/2020 FDW-AAA
Marty Gissel Principal Greenheck Fan 400 Ross Avenue Schofield, WI 54476	M 08/03/2016 FDW-AAA	Jerrold S. Gorrell Principal Theatre Safety Programs 15514 East Bumblebee Lane Fountain Hills, AZ 85268 US Institute for Theatre Technology, Inc. Alternate: Daniel J. Culhane	IM 4/3/2003 FDW-AAA
Howard J. Gruszynski Principal Badger International Engineering Consultants 5365 South Butterfield Way Greenfield, WI 53221	SE 08/11/2020 FDW-AAA	Steven C. Hahn Principal Lawrence Roll-Up Doors, Inc. 2420-C1 Sand Creek Road, #181 Brentwood, CA 94513 Door & Access Systems Manufacturers Assn. International Alternate: Joel Bonnell	M 1/1/1992 FDW-AAA

Address List No Phone

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Fire Doors and Windows

Harold D. Hicks, Jr.	SE 1/1/1994	Thomas R. Janicak	M 1/1/1986
Principal Atlantic Code Consultants 4530 William Penn Highway #4350 Murrysville, PA 15668-2002	FDW-AAA	Principal Ceco Door Products 801 Mark Lane Hampshire, IL 60140 Steel Door Institute Alternate: Kurt A. Roeper	FDW-AAA
William E. Koffel	M 1/1/1990	Vernon Wesley Lewis	M 08/11/2020
Principal Koffel Associates, Inc. 8815 Centre Park Drive Suite 200 Columbia, MD 21045-2107 Glazing Industry Code Committee Alternate: Thomas Zaremba	FDW-AAA	Principal National Association of Architectural Metal Manufacturers (NAAMM) 123 College Place Unit 1101 Norfolk, VA 23510 National Assn. of Architectural Metal Manufacturers	FDW-AAA
Keith Lippincott	E 10/23/2013	Rossen E. Marinov	M 08/08/2019
Principal University of Maryland Service Building 812, Suite 0103 4716 Pontiac Street College Park, MD 20742 Alternate: William F. Guffey	FDW-AAA	Principal Masonite 1955 Powis Road West Chicago, IL 60185 Window & Door Manufacturers Association Alternate: Steven Orlowski	FDW-AAA
Kent Maune	M 04/05/2016	Robert J. Muren	I 12/06/2019
Principal Ruskin Manufacturing 3900 Dr. Greaves Road Grandview, MO 64030	FDW-AAA	Principal Liberty Mutual Insurance Company 4716 Ruth Street Belleville, IL 62226-4628	FDW-AAA
Timothy J. Orris	M 12/06/2019	James S. Peterkin	U 08/03/2016
Principal AMCA International, Inc. 30 West University Drive Arlington Heights, IL 60004-1893	FDW-AAA	Principal TLC Engineering Senior Fire Protection Engineer 1700 Market Street, Suite 1525 Philadelphia, PA 19103 NFPA Health Care Section Alternate: Anne M. Guglielmo	FDW-AAA
Michael Puls	RT 8/9/2011	Steven P. Reynolds	M 3/21/2006
Principal Intertek 8431 Murphy Drive Middleton, WI 53562 Intertek Testing Services Alternate: Justin Scott Hendricks	FDW-AAA	Principal The Peelle Company Ltd. 195 Sandalwood Parkway West Brampton, ON L7A 1J6 Canada National Elevator Industry Inc. Alternate: Kevin L. Brinkman	FDW-AAA

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Jerry Rice	IM 04/03/2019	James R. Richardson	E 08/08/2019
Principal DH Pace Company Inc. 901 East 19th Street Olathe, KS 66061-9502 Alternate: Craig Ordmandy	FDW-AAA	Principal Lisle Woodridge Fire District 1005 School Street Lisle, IL 60532	FDW-AAA
Christopher A. Roth	E 08/11/2020	Thomas M. Rubright	M 1/14/2005
Principal Town of Brighton 2300 Elmwood Avenue Rochester, NY 14618-2145	FDW-AAA	Principal William S. Trimble Company, Inc. 2200 Atchley Street Knoxville, TN 37920 Door and Hardware Institute Alternate: Rodney Weaver	FDW-AAA
Michael L. Savage, Sr.	E 04/28/2008	James M. Shea	M 04/02/2020
Principal Marion County Building Safety 2710 E. Silver Springs Blvd. Ocala, FL 34470	FDW-AAA	Principal Globe Technologies 1109 W. Cedar Street PO Box 1070 Standish, MI 48658	FDW-AAA
Duane R. Smith	M 12/06/2017	Michael Tierney	M 1/12/2000
Principal National Energy Management Institute Inc. 2818 East 200 North Rushville, IN 46173	FDW-AAA	Principal Kellen Company 17 Faulkner Drive Niantic, CT 06357 Builders Hardware Manufacturers Association Alternate: Karen Bishop	FDW-AAA
Garrett S. Tom	U 3/1/2011	Yunyong Pock Utiskul	SE 8/9/2011
Principal International Fire Door Inspector Association 52 Laxalt Drive Carson City, NV 89706 Alternate: Thomas Resciniti Demont	FDW-AAA	Principal Exponent, Inc. 17000 Science Drive, Suite 200 Bowie, MD 20715-4427	FDW-AAA
Joshua Vann	U 08/17/2018	Luke C. Woods	RT 07/29/2013
Principal MB Healthcare 24 Linda Drive Jackson, NJ 08527	FDW-AAA	Principal UL LLC 146 Nathaniel Drive Whitinsville, MA 01588-1070 Alternate: Alfredo M. Ramirez	FDW-AAA
Joon Yoo	U 08/08/2019	Anthony W. Yuen	E 1/12/2000
Principal Department Of Defense 9561 Clocktower Lane Columbia, MD 21046	FDW-AAA	Principal Berkeley Fire Department Fire Marshal 2100 MLK Jr. Way, 2nd floor Berkeley, CA 94704	FDW-AAA

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John Hamilton	SE 04/08/2015	Karen Bishop	M 08/08/2019
Voting Alternate	FDW-AAA	Alternate	FDW-AAA
National Energy Management Institute International Certification Board Testing Adjusting 7282 Newbury Court Woodbury, MN 55125-2816		Builders Hardware Manufacturers Association 962 Grandstone Court Lebanon, OH 45036 Principal: Michael Tierney	
Joel Bonnell	M 08/03/2016	Kevin L. Brinkman	M 08/17/2015
Alternate	FDW-AAA	Alternate	FDW-AAA
Raynor Garage Doors 1101 East River Road Dixon, IL 61021 Door & Access Systems Manufacturers Assn. International Principal: Steven C. Hahn		National Elevator Industry, Inc. 925 West Center Street Eureka, IL 61530-9505 National Elevator Industry Inc. Principal: Steven P. Reynolds	
Daniel J. Culhane	IM 03/07/2013	Thomas Resciniti Demont	U 08/17/2017
Alternate	FDW-AAA	Alternate	FDW-AAA
Wenger Corporation 4145 Garfield Avenue South Minneapolis, MN 55409 US Institute for Theatre Technology, Inc. Principal: Jerrold S. Gorrell		Technical Services Inc. 1009 Saddleclub Drive McMurray, PA 15317 International Fire Door Inspector Association (IFDIA) Principal: Garrett S. Tom	
William F. Guffey	E 03/05/2012	Anne M. Guglielmo	U 04/04/2017
Alternate	FDW-AAA	Alternate	FDW-AAA
University of Maryland Office of the Fire Marshal 3115 Chesapeake Building College Park, MD 20742 Principal: Keith Lippincott		Code Consultants, Inc. 2043 Woodland Parkway Suite 300 St. Louis, MO 63146 NFPA Health Care Section Principal: James S. Peterkin	
Daisy R. Harington	E 11/30/2016	Justin Scott Hendricks	RT 08/17/2017
Alternate	FDW-AAA	Alternate	FDW-AAA
City Of Saskatoon Building Standards 222 3rd Avenue North Saskatoon, SK S7K 0J5 Canada Principal: Luc Durand		Intertek 8431 Murphy Drive Middleton, WI 53562 Intertek Testing Services Principal: Michael Puls	
Craig Ordmandy	IM 08/08/2019	Steven Orlowski	M 04/11/2018
Alternate	FDW-AAA	Alternate	FDW-AAA
Door Control Services, Inc. 321 VZ County Road 4500 Ben Wheeler, TX 75754 Principal: Jerry Rice		Windows & Door Manufactures Association (WDMA) 2025 M Street NW, Suite 800 Washington, DC 20005-2800 Principal: Rossen E. Marinov	

Address List No Phone

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Fire Doors and Windows

Alfredo M. Ramirez	RT 08/17/2015	Kurt A. Roeper	M 9/30/2004
Alternate UL LLC 333 Pfingsten Road Northbrook, IL 60062-2096 Principal: Luke C. Woods	FDW-AAA	Alternate ASSA ABLOY 110 Sargent Drive New Haven, CT 06511 Steel Door Institute Principal: Thomas R. Janicak	FDW-AAA
William Skene	I 12/06/2019	Garry Stewart	IM 3/15/2007
Alternate FM Global 157 Stone Bridge Road Woodstock, CT 06281 Principal: Joanna Blaney	FDW-AAA	Alternate The Doorman Service Company, Inc. PO Box 1603 Kent, WA 98035 International Door Association Principal: David Dawdy	FDW-AAA
David V. Tomecek	SE 7/26/2007	Rodney Weaver	M 11/30/2016
Alternate JENSEN HUGHES 10170 Church Ranch Way Suite 200 Westminster, CO 80021 JENSEN HUGHES Principal: Bruce G. Campbell	FDW-AAA	Alternate ASSA ABLOY Academy 2335 Abington Drive Charlottesville, VA 22911 Door and Hardware Institute Principal: Thomas M. Rubright	FDW-AAA
Thomas Zaremba	M 08/17/2017	Joseph N. Saino	SE 1/1/1973
Alternate Roetzel and Andress 1 Seagate Suite 1700 Toledo, OH 43604 Glazing Industry Code Committee Principal: William E. Koffel	FDW-AAA	Member Emeritus 6560 Kirby Forest Cove Memphis, TN 38119	FDW-AAA
Jen Sisco	08/20/2019		
Staff Liaison National Fire Protection Association One Batterymarch Park Quincy, MA 02169	FDW-AAA		



MINUTES

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

November 13 – 14, 2019
Embassy Suites New Orleans Convention Center
315 Julia Street, New Orleans, LA 70130

- 1. Call to order.** The meeting was called to order Chair, Keith Pardoe at 8:00 AM (CT) on November 13, 2019 at the Embassy Suites New Orleans Convention Center in New Orleans, LA.
- 2. Introduction of committee members and guests.** The following technical committee members were in attendance:

NAME	COMPANY
Keith Pardoe, Chair	Pardoe Consulting LLC
Bruce Campbell, Principal	JENSEN HUGHES
William Conner, Principal	Bill Conner Associates LLC Rep.: American Society of Theater Consultants
David Dawdy, Principal	Cornell Iron Works, Inc.
Marty Gissel, Principal	Greenheck Fan
Jerrold Gorrell, Principal	Theatre Safety Programs Rep.: US Institute for Theatre Technology, Inc.
William Koffel, Principal	Koffel Associates, Inc. Rep.: Glazing Industry Code Committee
Keith Lippincott, Principal	University of Maryland
Rossen Marinov, Principal	Masonite Rep.: Window & Door Manufacturers
James Peterkin, Principal	TLC Engineering Rep.: NFPA Health Care Section
Michael Puls, Principal	Intertek Testing Services
Steven Reynolds, Principal	The Peelle Company Ltd. Rep.: National Elevator Industry Inc.
Jerry Rice, Principal	DH Pace Company Inc.
James Richardson, Principal	Lisle Woodridge Fire District

Thomas Rubright, Principal	William S. Trimble Company, Inc. Rep.: Door and Hardware Institute
Duane Smith, Principal	National Energy Management Institute, Inc.
Michael Tierney, Principal	Kellen Company Rep.: Builders Hardware Manufacturers Association
Karen Bishop, Alternate to M. Tierney	Builders Hardware Manufacturers Association
Daniel Culhane, Alternate to J. Gorrell	Wenger Corporation
Justin Hendricks, Alternate to M. Puls	Intertek Testing Services
Kent Maune, Alternate to R. Cravy	Ruskin Manufacturing
Craig Ormandy, Alternate to J. Rice	Door Control Services, Inc.
Steven Orlowski, Alternate to R. Marinov	Windows & Door Manufacturers Association
Alfredo Ramirez, Alternate to L. Woods	UL LLC
Kurt Roeper, Alternate to T. Janicak	ASSA ABLOY
Thomas Zaremba, Alternate to W. Koffel	Roetzel and Andress Rep.: Glazing Industry Code Committee
Jennifer Sisco, Staff Liaison	NFPA

The following committee members were not in attendance (not listed where the alternate was in attendance):

NAME	COMPANY
Chad Beebe, Principal	ASHE - AHA
Luc Durand, Principal	Saskatoon Fire Department
Steven Hahn, Principal	Lawrence Roll-Up Doors, Inc. Rep.: Door & Access Systems Manufacturers Assn. International
Harold Hicks, Jr., Principal	Atlantic Code Consultants
Vernon Patton, Principal	First Energy Corporation
Ronald Rispoli, Principal	Entergy Corporation
Michael Savage, Sr., Principal	Marion County Building Safety
Robert Stubblefield, Principal	Framatome
Garrett Tom, Principal	International Fire Door Inspector Association
Yunyong Pock Utiskul, Principal	Exponent, Inc.
Joshua Vann, Principal	MB Healthcare
Joon Yoo, Principal	Department of Defense
Anthony Yuen, Principal	Berkeley Fire Department
John Hamilton, Voting Alternate	National Energy Management Institute

The following guests were in attendance:

NAME	COMPANY
Joanna Blaney	FM Approvals
Bob Cullum, AHC	Dugmore & Duncan
David Feist	ANAB
Curtis Gonzales	Smoke Guard Inc.
Anne Guglielmo	CCI
Aaron Gunzner	AMCA International
Marilyn Latham	NAAMM / HMMA
Wes Lewis	NAAMM
Chuck Noble	Certified Fire Door
Tim Orris	AMCA International
Drew Pearson	Guardian Fire Testing
Luanne Parson	Guardian Fire Testing Laboratories

3. **Approval of meeting minutes.** The April 25, 2019 Pre-First Draft Meeting Minutes were approved with no modifications.
4. **Chair remarks.** The chair welcomed the committee members and provided an overview of the goals and objectives of the meeting. The chair highlighted that there are multiple opening protective types in NFPA 80 which would use additional representation on the committee, as well as the desire for additional members within the enforcer classification, and that the committee is always taking applications for new members.
5. **Code Writing Overview.** The chair provided a presentation on proper code writing techniques.
6. **Staff liaison presentation.** NFPA staff provided an overview of the meeting procedures and rules and regulations for technical committee members.
7. **NFPA 105 Draft Preparation.** All public inputs were reviewed. First revisions and committee inputs were prepared as needed.
8. **NFPA 80 Draft Preparation.** All public inputs were reviewed. First revisions and committee inputs were prepared as needed.
9. **Task Group on Damper Definitions.** Chair A. Ramirez. A task group was formed to review damper definitions in NFPA 105 and NFPA 80 for consistency with other NFPA documents including NFPA 90A and NFPA 5000. The task group provided a recommendation to the committee and first revisions were prepared. The task group was disbanded.
10. **Task Group on Inspector Qualifications.** Chair J. Rice. A task group was formed to review the requirements within NFPA 105 to review requirements for inspection and testing to be performed by a qualified person. The task group provided a recommendation to the committee and first revisions were prepared. The task group was disbanded.

- 11. Task Group B Report – Remote Damper Inspection.** Fire and smoke damper remote inspection requirements in NFPA 80 and NFPA 105. Chair M. Gissel. The task group identified the need to conduct further research and committee inputs were prepared for NFPA 80 and NFPA 105.
- 12. Task Group C Report – Swinging Doors with Fire Door Hardware Requirements.** Chair K. Pardoe. Chair K. Pardoe recused himself and this agenda item was chaired by W. Koffel. The task group provided recommendation for a rewrite and reorganization of Chapter 7 and new inspection requirements for swinging doors with fire door hardware. First revisions were made as necessary. The task group was disbanded.
- 13. Committee Member Report – NFPA 80 Signage Requirements.** B. Campbell provided the committee a recommendation for revised signage requirements and a first revision was made. The need for additional data regarding signage on fire doors was discussed and a motion passed that B. Campbell and K. Pardoe will prepare with a proposal for a new project to test effects of signage on fire doors for the NFPA Fire Protection Research Foundation.
- 14. Task Group A Report – NFPA 80 Field Labeling.** Chair J. Rice. The task group provided the committee with a recommendation and a first revision was prepared. The task group requested additional time to research the potential development of a program which will address the required core competencies and professional qualifications for persons or entities performing field labeling.
- 15. Codes which Reference NFPA 80 and NFPA 105.** S. Hahn. This proposal was drafted by S. Hahn and presented by D. Dawdy. Recommended wording for documents which reference NFPA 80 and NFPA 105 was proposed, no action was taken. A recommendation for updating the application of NFPA 80 and 105 was proposed and first revisions were prepared for both NFPA 80 and NFPA 105.
- 16. NFPA 80 Chapter 4 Requirements.** J. Rice. A recommendation was provided to the committee with a rewrite and reorganization of Chapter 4 was presented to the committee and first revisions and committee inputs were developed as necessary. A task group was formed to review the scope and the work of the Chapter 4 reorganization, Chair J. Rice.
- 17. Legacy Installations.** A recommendation on existing wired glazing was provide by B. Campbell and a first revision was prepared.
- 18. Other Business.**
 - a. J. Sisco outlined an extract update in NFPA 80 to comply with NFPA Manual of Style. A first revision was prepared.
 - b. J. Sisco provided the committee with editorial recommendations for NFPA 80 for compliance with the NFPA Manual of Style. A committee input was prepared and a task group was formed to review the recommended editorial changes.
 - c. J. Sisco informed the committee about actions taken in NFPA 101 regarding fire doors in openings not required to be fire rated. First revisions were prepared.

- d. J. Sisco informed the committee of a potential typographic error in NFPA 80, Figure A.4.8.4.2(a). A first revision was prepared.
 - e. D. Dawdy provided a recommendation to include requirements for a trained rolling steel fire door systems technician in NFPA 80. First revisions were prepared.
 - f. W. Connor provided a recommendation for an annex to NFPA 80, section 20.1. A first revision was prepared.
 - g. The chair made an announcement to solicit membership and participation for current task groups for this committee. All active task groups are currently soliciting new members, final membership for all task groups will be determined by the committee chair and the task group chair. Please email Jennifer Sisco at jsisco@nfpa.org about interest in serving on a task group. The following is a list of the active task groups:
 - Task Group A – NFPA 80 Field Labeling. Chair J. Rice.
 - Task Group B – NFPA 80 and 105 Remote Damper Inspection. Chair M. Gissel.
 - Task Group C – NFPA 80 Chapter 4 Reorganization. Chair J. Rice.
 - Task Group D – NFPA 80 Editorial Review. Chair K. Pardoe.
- 19. Next meeting.** The next meeting will be the Second Draft Meeting. This meeting will be held in the summer or fall of 2020.
- 20. Adjournment.** The meeting was adjourned by Chair, Keith Pardoe, at 6:15 p.m. (CT) on November 14, 2019.



NATIONAL FIRE PROTECTION ASSOCIATION
The leading information and knowledge resource on fire, electrical and related hazards

NFPA 80 and 105 Second Draft Meeting

Technical Committee on Fire Doors and Windows

Date: October 6 – October 8, 2020, 10:00 am – 2:30 p.m. (ET)

Staff liaison: Greg Harrington | Chair: Keith Pardoe

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NFPA Second Draft Meeting

Web Conference Protocol

- State name before speaking
- Keep yourself on mute while not speaking
- Shut off video if you have a slow connection



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NFPA Second Draft Meeting

Members

- Members, please verify/update your contact information
- Use of audio recorders or other means capable of reproducing verbatim transcriptions of this or any NFPA meeting is not permitted



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NFPA Second Draft Meeting

Guests

- Sign in and identify affiliations
- Participation
 - Requested 7 days prior to the meeting or;
 - At the discretion of the Chair
- Equal opportunity granted to opposing views



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NFPA Second Draft Meeting

Members categorized in ANY interest category who have been retained to represent the interests of ANOTHER interest category (with respect to a specific issue or issues that are to be addressed by a TC/CC) shall declare those interests to the committee and refrain from voting on any Public Input, Comment, or other matter relating to those issues throughout the process.



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NFPA Second Draft Meeting

Technical Committee on Fire Doors and Windows

Category	Number of Members	Percentage
Enforcer	6	15%
Insurance	2	5%
Installer/Maintainer	3	8%
Labor	0	0%
Manufacturer	13	33%
Research & Testing	2	5%
Special Expert	7	18%
User	6	15%
Consumer	0	0%



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NFPA Second Draft Meeting

Public Input (First Draft)	
Public Input Closing Date	06/26/2019
First Draft Meeting Date	11/13/2019 – 11/14/2019
Posting of First Draft Report	02/25/2020
Comment Stage (Second Draft)	
Public Comment Closing Date	05/06/2020
Second Draft Meeting Dates	10/06/2020 – 10/08/2020
Posting of Second Draft for Balloting Date	12/16/2020
Posting of Second Draft for NITMAM	01/20/21
Tech Session Preparation	
NITMAM Closing Date	02/17/2021
NITMAM/CAM Closing Date	03/30/2021
NFPA Annual Meeting	June 2021
Standards Council Issuance	
Issuance of Consent Documents	04/26/2021
Issuance of Documents with CAM	-



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NFPA Second Draft Meeting

General Procedures

- Follow Robert's Rules of Order.
- Discussion requires a motion.



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NFPA Second Draft Meeting

Motions for Ending Debate Previous Question or “Call the Question”

- Not in order when another has the floor
- Requires a second
- This motion is not debatable and DOES NOT automatically stop debate
- A 2/3 affirmative vote will immediately close debate and return to the original motion on the floor. Less than 2/3 will allow debate to continue.



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NFPA Second Draft Meeting

Committee member actions

- Member addresses the chair.
- Receives recognition from the chair.
- Introduces the motion.
- Another member seconds the motion.



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NFPA Second Draft Meeting

Resolving Public Comments

- Committee develops a Committee Action
 - Accept
 - Reject but see...
 - Reject
 - Reject but Hold



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NFPA Second Draft Meeting

Committee Statements

- Committee must clearly indicate reasons for not accepting the recommendation and/or point to a relevant Second Revision
- All Public Comments must have a Committee Statement
- Must include a valid technical reason



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NFPA Second Draft Meeting

Committee Statements

- No vague references to “intent”
- Explain how the submitter’s substantiation is inadequate
- Neither PC Action nor Committee Statements get balloted



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NFPA Second Draft Meeting

New material

- No “new material” after the Public Input Stage since it hasn’t had the benefit of public review.
- What constitutes new material is decided by the TC or Correlating Committee.
- Adding “new material” at this stage could successfully be challenged through appeal to the NFPA Standards Council



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NFPA Second Draft Meeting

Formal Voting

- Voting during meeting is used to establish a sense of agreement (simple majority)
- Secured by letter ballot (2/3 agreement)
- Only the results of the formal ballot determine the official position of the committee on the Second Draft



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NFPA Second Draft Meeting

Ballots

- Second Revisions (SR) ONLY
- Voting Options:
 - Affirmative on all
 - Affirmative on all with exceptions
- Reject or abstain requires a reason.



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NFPA Second Draft Meeting

Circulation

- Initial ballot
- Circulation of negatives and comments
- Members may change votes during circulation
- Second Revision that fails letter ballot shall be designated as a Committee Comment (in the 2nd Draft Report), marked as “Reject” and deleted from the Second Draft



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NFPA Second Draft Meeting

Electronic Balloting

- Ballots will be an online format
- Alternates are strongly encouraged to return ballots
- Ballot session will time out after 90 minutes
- Use “submit” to save your work



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NFPA Second Draft Meeting

- Click link on the ballot email received
- Sign in with NFPA.org Committee Login and Password

Logged In As: Patrick Foley | Home | Logout

National Fire Protection Association Company Logo

Title	Open until	Your Status	Action
NFPA268_TestBallot	December 31, 2012 11:59 AM (GMT-05:00) Eastern Time (US & Canada)	In Progress	Start



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NFPA Second Draft Meeting

Select either Affirmative on All or Affirmative with Exception(s)

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NFPA268_TestBallot

Open Until November 06, 2012 1:00 AM (GMT-05:00) Eastern Time (US & Canada)

Page 1 of 2

Affirmative All Question

☐ Affirmative All

☐ Affirmative with Exception(s)

1 of 2

[Back](#) [Next](#)

Instructions

NOTE! You must SUBMIT your ballot to SAVE your work.

Please review the options on the left and respond appropriately.

Reasons must accompany all Affirmative with Comment, Negative and Abstaining votes.

Please do not vote negatively because of editorial errors.

Please contact your project administrator or staff liaison for assistance if necessary.



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NFPA Second Draft Meeting

- Use “See SR - #” link to review Second Revisions
- Use “Edit election” to change individual votes or to modify vote after submitting ballot.

National Fire Protection Association Company Logo

NFPA268_TestBallot

Open Until November 09, 2022 1:00 AM (GMT-05:00) Eastern Time (US & Canada)

[Select](#) [Review & Submit](#) [Confirmation](#)

Review your selections below

FR-2, New Section after 2.3.2, See FR-2
Affirmative

FR-4, Chapter 10, See FR-4
Affirmative

FR-6, Section No. 11.4, See FR-6
Affirmative

[edit election](#)

Participant Consent

☐ By checking this box, you are electronically signing this form and verifying that you are the Committee member listed above.

[Submit](#)



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NFPA Second Draft Meeting

To complete ballot click Participant Consent and Submit
Return and edit any votes before ballot due date.

Participant Consent

☒ By checking this box, you are electronically signing this form and verifying that you are the Committee member listed above.

[Submit](#)



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Legal

Antitrust Matters

- It is the policy of the NFPA to strictly comply with state and federal antitrust laws.
- NFPA expects all participants in its standards development activities to conduct themselves in strict accordance with these laws.
- It is the obligation of each participant to read and understand NFPA's Antitrust Policy. (You can access this policy at [nfpa.org/regs](https://www.nfpa.org/regs).)



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Legal

Antitrust Matters (cont'd)

- Participants must avoid any conduct, conversation or agreement that would constitute an unreasonable restraint of trade.
- Conversation topics that are off limits include:
 - Profit, margin, or cost data;
 - Prices, rates, or fees;
 - Selection, division or allocation of sales territories, markets or customers;
 - Refusal to deal with a specific business entity.



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Legal

Antitrust Matters (cont'd)

- NFPA's standards development activities are based on openness, honesty, fairness and balance.
- Participants must adhere to the *Regulations Governing the Development of NFPA Standards* and the *Guide for the Conduct of Participants in the NFPA Standards Development Process*. (You can access the *Regulations* and *Guide* at nfpa.org/regs.)
- Follow guidance and direction from your employer or other organization you may represent.



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Legal

Antitrust Matters (cont'd)

- Manner in which standards development activity is conducted can be important.
- The *Guide* requires standards development activity to be conducted with openness, honesty and in good faith.
- Participants are not entitled to speak on behalf of NFPA.
- Participants must take appropriate steps to ensure their statements whether written or oral and regardless of the setting, are portrayed as personal opinions, not the position of NFPA.



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Legal

Patents

- Disclosures of essential patent claims should be made by the patent holderA.
- Patent disclosures should be made early in the process.
- Others may also notify NFPA if they believe that a proposed or existing NFPA standard includes an essential patent claim.
- NFPA has adopted and follows ANSI's Patent Policy.
- It is the obligation of each participant to read and understand NFPA's Patent Policy. (You can access this policy at nfpa.org/regs.)



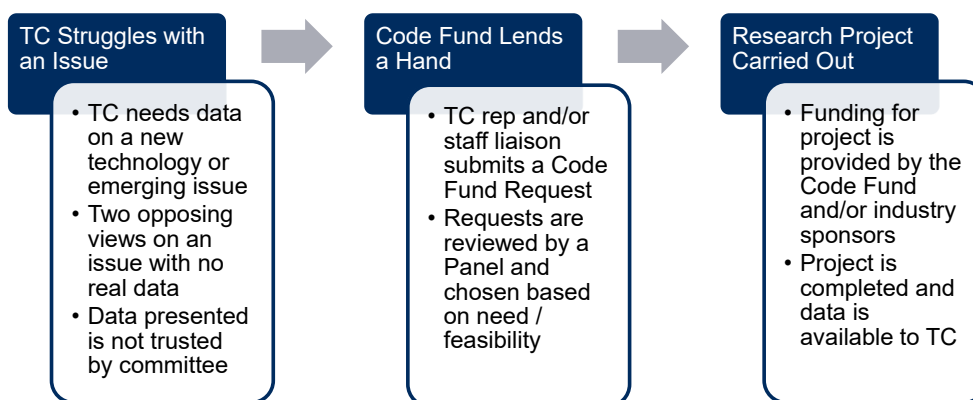
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Public Comment No. 1-NFPA 105-2020 [New Section after 7.5.2.3.3]

Concerns on lack of Physical Verification for Remote Testing

I have concerns regarding the following sections:

- NFPA 105
 - 7.6.3.3 Remote Inspection Method
- NFPA 80
 - 19.5.2.3.3 – Remote Inspection Method

Most of my career was spent in the field physically verifying if mechanical devices functioned as designed. There is one absolute truth -- **mechanical devices and their associated controls will fail** . Countless times, during operational, acceptance, and periodic inspections, I found mechanical devices that failed in the field even though their associated controls showed them as functioning correctly.

Personally, seeing and repairing so many dampers in my region, I see faulty fire and smoke dampers as one of the primary safety issues and inevitable catastrophes in existing buildings.

I completely understand that the manufactures have developed outstanding remote features and related products. However, if there is even a 1% failure rate on remote testing, that 1% will risk the lives of countless building patrons.

I also completely understand concerns about risking contamination by opening ceiling tiles within medical settings. However, we already were only checking hospitals **every 6 years** and following strict containment procedures.

Now you go from 100% physical inspection to 0% after the initial acceptance test. I could understand the logic to doubling the physical inspection where there is contamination concerns and remote testing capabilities, but to never require a physical inspection after the initial acceptance test is unrealistic.

How many years does the Technical Committee suggest the remote testing features will work without failure... 25, 50, 100, 300. By saying the remote damper features have **unlimited life with no physical maintenance** requirements, you are essentially suggesting the sensing features will function perfectly into eternity. No field technician would make that claim.

Additionally, allowance for Remote Inspection result in increasing installations with limited or no viable access. How are technicians supposed to make repairs “as soon as possible (7.7.3)” if there is not access because of walls, other mechanical devices, pipes, bricks, beams etc.?

Per the NFPA 80 and 105, physical maintenance, is still required. Why not require a visual verification of the damper operation during the maintenance?

- NFPA 105, 19.6.2
 - *All exposed moving parts of the damper shall be dry lubricated as required by the manufacturer.*
- NFPA 80, 7.7.2

- All exposed moving parts of the damper shall be dry lubricated as required by the manufacturer.

I request that the decision on remote inspections without periodic physical inspections be re-evaluated.

Thank you for your consideration,

Christopher Ruch

Director of Training

National Energy Management Institute

Statement of Problem and Substantiation for Public Comment

Remote Testing would require periodic physical verification beyond initial acceptance test. Not physically verifying operation will result in some faulty dampers operations not being caught.

Related Item

- CI-29-NFPA 105-2019

Submitter Information Verification

Submitter Full Name: Christopher Ruch

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Submittal Date: Wed May 06 12:43:29 EDT 2020

Committee: FDW-AAA



Committee Input No. 29-NFPA 105-2019 [Section No. 7.6.3.3]

7.6.3.3 Remote Inspection Method.

7.6.3.3.1 General.

7.6.3.3.1.1

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

7.6.3.3.1.2

The initial remote inspection shall include a visual inspection of the damper in accordance with 7.6.3.2.

7.6.3.3.1.3

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

7.6.3.3.2 Test Procedure.

7.6.3.3.2.1

The full-open or full-closed position, as required by the system design, shall be confirmed via the damper's position indication device.

7.6.3.3.2.2

The damper shall be commanded and confirmed to the full-closed or full-open position.

7.6.3.3.2.3

The damper shall be confirmed to be in the original operating position as required by the system design.

7.6.3.3.2.4

If the remote inspection fails to comply with the requirements of 7.6.3.3.2.1 through 7.6.3.3.2.3, a visual inspection shall be performed in accordance with 7.6.3.2.

Submitter Information Verification

Committee: FDW-AAA

Submittal Date: Thu Nov 21 11:10:11 EST 2019

Committee Statement

Committee Statement: A task group is in the process of gathering real world data on damper failure rates and causes of failures to determine if revisions are required to the remote test method. The task group plans to review the data, from dampers eligible to utilize the remote test method, to determine the frequency of actual failures that could result in false positive remote tests. A false positive test is defined as an identified failure that could result in a damper successfully completing the remote test sequence when in fact the damper is not operating as designed. The task group needs additional time to determine if this data currently exists.

If after reviewing this data it is deemed that there are valid concerns of false positive remote tests the task group will investigate adding a requirement to the remote test method for visual inspections to be conducted on a time frame exceeding 4 years (or 6 years for hospitals). An alternate modification that would be considered is to require a certain percentage of dampers utilizing the remote test method to be inspected visually during each damper inspection cycle. If one of the dampers that was visually inspected showed a false positive remote test it could trigger a larger scale visual inspection of remotely tested dampers.

Response Message: CI-29-NFPA 105-2019

Ballot Results

 **This item has not been balloted**

**Public Comment No. 1-NFPA 80-2020 [Section No. 3.3.33]****3.3.33 – Counter Door.**

A labeled assembly consisting of a rolling steel fire door that incorporates a four-sided frame used for the protection of openings in walls where the primary purpose of the opening is for nonpedestrian use, such as counter service for food, a pharmaceutical dispensary, package and baggage transfer, or observation ports.

Statement of Problem and Substantiation for Public Comment

We disagree with the terminology change where "service counter fire door" and "counter fire door" are globally being changed to "counter door". In industry terms, a counter fire door is simply a smaller and more compactly constructed version of a full size rolling steel fire door. It can be – but is not always – used on a service counter opening. Its guides are installed on the face of the wall or between the jambs. There is no frame or sill. They are covered by UL category GSVV. A service counter fire door is a different product that is normally restricted to small sizes typical of service counter openings. It is usually installed as an integral assembly into an opening, and includes a frame that typically includes a sill. It is covered by a separate UL category GSWT. The current terminology is category/construction based and not application based. At best, the global change to "counter door" will lead to confusion. Worst case, AHJs will expect to find frames and sills on products when they are not required by their listing. Therefore, the terms "service counter fire door" and "counter fire doors" should continue to be as shown in the 2019 edition of the standard.

Related Item

- FR31

Submitter Information Verification

Submitter Full Name: Joseph Hetzel

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Submission Date: Mon Apr 27 14:52:42 EDT 2020

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

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
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 more 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
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Affiliation:	DH Pace family of companies and input from what really happens in the field..
Street Address:	
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Zip:	
Submittal Date:	Mon May 04 11:55:31 EDT 2020
Committee:	FDW-AAA

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.

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 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

<u>File Name</u>	<u>Description Approved</u>
.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**Submitter Full Name:** Charles Noble**Organization:** Certified Fire Door**Street Address:****City:****State:****Zip:****Submittal Date:** Tue May 05 12:45:55 EDT 2020**Committee:** FDW-AAA

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

To the NFPA-80 Committee
RE: Public Comment # 5-NFPA-80, May-5-2020

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 to gather information

The Certification body is legally responsible for handling any information developed or gathered during the certification process, excluding any material that are 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 strictly confidential.

See attachment below.

ISO /IEC 17065: 4.5.2 Releasing contractual information

When 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 Confidential agreement

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 oversight 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 oversee 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 personnel.

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 to file a complaint about their company or their personnel.

Anyone can make a complaint and by the International Standards, all complaint/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 from receipt, evaluation, and decisions, for all complaints and appeals.

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

Upon request, the Inspection Body must be able to provide the documentation of the complaints and appeals as to how complaints and appeals are handled.

ISO /IEC 17020: 7.5.3 Actions of the complaint

Once a complaint is received, the Inspection Body must assess and determine whether the actions related to the

complaint are indeed an inspection activity. 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 to 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

A natural 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 if 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 complaint and outcome will be 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 specific inspection activities.

ISO /IEC 17020: 6.1.3 Personnel Training

Inspection Bodies personnel, 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 understands the duties and responsibilities required from each position.

ISO /IEC 17020: 6.1.5 Personnel Resources documentation

The Inspection Body must have the appropriate documentation for the entire hiring and contracting process to bring 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 personnel shall be responsible for monitoring inspection procedures of other inspectors to monitor the inspection activities. The findings will be used as a tool for establishing continued education.

ISO /IEC 17020: 6.1.9 Personnel, onsite training

All Inspection Body personnel responsible for inspection must be observed in the field, unless there is supporting and 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 for 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 (remunerated) for services rendered, or work done.

ISO /IEC 17020: 6.1.12. Personnel impartiality

All personnel involved with the Inspection Body, that have any involvement or influence in an inspection must act impartial and be unbiased.

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 oversight

The technical manager of an Inspection Body must have the technical understanding and 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 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 keep a record system to demonstrate the effectiveness of their procedures of their inspection activities.

ISO /IEC 17020: 7.3.2 Record traceability

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

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 oversight. 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 complaint 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.

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

Please see attach public access Certification Listing for Air Louver.



LISTING INFORMATION OF
Air Louvers Door & Frame Hardware
SPEC ID: 30323

Air Louvers, Inc.
6285 Randolph St.
Commerce, CA 90040
United States

This report is for the exclusive use of Intertek's Client and is provided pursuant to the agreement between Intertek and its Client. Intertek's responsibility and liability are limited to the terms and conditions of the agreement. Intertek assumes no liability to any party, other than to the Client in accordance with the agreement, for any loss, expense or damage occasioned by the use of this report. Only the Client is authorized to permit copying or distribution of this report and then only in its entirety. Any use of the Intertek name or one of its marks for the sale or advertisement of the tested material, product or service must first be approved in writing by Intertek. The observations and test results in this report are relevant only to the sample tested. This report by itself does not imply that the material, product, or service is or has ever been under an Intertek certification program.

LISTING INFORMATION

Pressed cold-rolled steel metal edge (ME*) or pressed cold-rolled steel astragal (MEA*), (18, 20 gauge) with galvanized, primed and painted, or stainless steel for installation at meeting edges of 1-3/4" thick wood door pairs in up to and including 1-1/2 hour locations.

Limitations: Maximum length of 9'0" shall be reduced to conform to the maximum height of the listed and installed door pair.

METAL MEETING EDGES AND ASTRAGALS FOR FIRE DOORS								
RATINGS	20	45	60	90	180	WOOD	COMPOSITE	STEEL
DL9	X	X	X	X	-	X	X	X
DL9A	X	X	X	X	-	X	X	X
DL5A	X	X	X	X	-	X	X	X
DL8	X	X	X	X	-	X	X	X
DL8A	X	X	X	X	-	X	X	X
DL3A	X	X	X	X	-	X	X	X
DL7	X	X	X	X	-	X	X	X
DL7A	X	X	X	X	-	X	X	X
DL2A	X	X	X	X	-	X	X	X
DA	X	X	X	X	-	X	X	X
DL4	X	X	X	X	-	X	X	X
DL5	X	X	X	X	-	X	X	X
*Manufacturer's designation								

Attribute	Value
Criteria	ASTM E152-81a
Criteria	UBC 7-2 (1994)
Criteria	NFPA 252 (2008)
Criteria	UL 10(b) Revision 1 (2009)
Criteria	CAN / ULC S104 (2010)
Criteria	NFPA 252 (2012)
Criteria	CAN / ULC S104 (2015)
Criteria	UL 10(c) (2016)
Criteria	UL 10(b) (R2015)
Criteria	NFPA 252 (2017)

CSI Code	08 70 00 Hardware
Intertek Services	Certification
Listed or Inspected	LISTED
Listing Section	DOOR & FRAME HARDWARE
Spec ID	30323

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.

-1-

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

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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 complaint and by the International Standards, all complaint/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 receipt 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 assess 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 complaint 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 oversight

The technical manager of an inspection body must have the technical understanding and experience required to act in the role. If there is an instance where there is more than one technical manager within an inspection body the specific roles 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 management's responsibilities to the field inspectors

Within an inspection body, it is the responsibility of the top management to understand and create 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 oversight. 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 complaint 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 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:

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Submittal Date: Wed May 06 15:00:06 EDT 2020

Committee: FDW-AAA



Public Comment No. 2-NFPA 80-2020 [Sections 5.5.5, 5.5.6]

Sections 5.5.5, 5.5.6

5.5.5

Where a fire door, frame, or any part of its ~~components~~ appurtenances is damaged to the extent that it could impair the door's proper emergency function, the following actions shall be performed:

- (1) The fire door, frame, door assembly, or any part of its ~~components~~ appurtenances shall be repaired with labeled parts or parts obtained from the original manufacturer.
- (2) The door shall be tested to ensure emergency operation and closing upon completion of the repairs.

5.5.6

If repairs cannot be made with labeled ~~components~~ appurtenances or parts obtained from the original manufacturer or retrofitted in accordance with Section 5.3, the fire door frame, fire door assembly, or components shall be replaced.

Statement of Problem and Substantiation for Public Comment

The term "appurtenances" should continue to be used, as per the 2019 edition of the standard. "Components" are parts, which are assumed to be parts of a tested/approved assembly. "Appurtenances" are accessories, which are assumed to be items added to a tested/approved assembly. As such, use of the term "components" potentially changes the intent of these sections. See the additional reasoning submitted by Mr. Steve Hahn, the DASMA representative to the NFPA 80 Committee, accompanying his negative vote on FR57.

Related Item

- FR57

Submitter Information Verification

Submitter Full Name: Joseph Hetzel

Organization: Thomas Associates, Inc.

Affiliation: DASMA

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City:

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Zip:

Submission Date: Mon Apr 27 15:04:06 EDT 2020

Committee: FDW-AAA

**Public Comment No. 41-NFPA 80-2020 [New Section after 19.4.1]****Qualified Person**

I had seen some draft versions where the 19.4.1 language was crossed out.

It is important to maintain that a qualified person perform all life safety testing.

Please insure that the language in 19.4.1 is maintained

19.4.1 Acceptance testing of fire sampers shall be performed by a qualified person with knowledge and understanding of the operating components of the type of assembly being subject to testing and the system in which it is installed.

Statement of Problem and Substantiation for Public Comment

I technicians that is not qualified will not be able to properly assess if a system or component is operating correctly.

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 14:49:58 EDT 2020

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

<u>Related Comment</u>	<u>Relationship</u>
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:

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Zip:

Submittal Date: Wed May 06 14:25:19 EDT 2020

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

**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 is 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



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 possible 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:

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Submittal Date: Wed May 06 15:04:38 EDT 2020

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 accessible 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 Hernandez

Organization: [Not Specified]

Street Address:

City:

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Submittal Date: Wed May 06 15:04:43 EDT 2020

Committee: FDW-AAA



Public Comment No. 27-NFPA 80-2020 [New Section after 19.5.2.3.3]

2019 NFPA 80 and 105-Remote Inspection Method

Dear Mr. Pardoe and Ms. Carey:

My name is David Garcia and I am a Training Coordinator for the Southern California Sheet Metal Workers JATC Local 105. I am writing regarding the 2019 NFPA Standard 80 (Section 7.6.3.3) and 2019 NFPA Standard 105 (Section 19.5.2.3.3) both of which cover Remote Inspection Method. As a sheet metal worker and educator in Fire Life Safety we emphasize the importance of physically observing the proper functionality of a damper to every student being Apprentice or Journeyman. There are no substitutes when it comes to physically observing if an actuator is properly closing a fire damper or not. I feel that we will be taking an unnecessary risk to the safety and well being of both building occupants and first responders. We here at the Southern California Sheet Metal Workers JATC support your organizations work in fire life safety and certification. We hope the NFPA reconsiders restoring the visual inspection requirements of fire and smoke dampers in standards 80 and 105 in the next update cycle. Please convey our concerns to the respective technical committee.

Respectfully,

David E. Garcia

Training Coordinator

SoCal Sheet Metal Workers JATC

633 N. Baldwin Park Blvd.

City of Industry, CA 91746

Tel: 626-968-3340

Additional Proposed Changes

<u>File Name</u>	<u>Description Approved</u>
.1588787356867	

Statement of Problem and Substantiation for Public Comment

Failures of remote dampers never being found.

Related Item

- NFPA 105 and 80 2019-Remote Inspection Method

Submitter Information Verification

Submitter Full Name:	David Garcia
Organization:	SoCal Sheet Metal Workers JATC
Affiliation:	Southern California Sheet Metal Joint Apprenticeship and Training Committee
Street Address:	
City:	
State:	
Zip:	
Submission Date:	Wed May 06 12:02:16 EDT 2020
Committee:	FDW-AAA



Public Comment No. 47-NFPA 80-2020 [Section No. 19.5.2.3.3]

-

~~19.5.2.3.~~

~~3 Remote~~

~~3 Remote Inspection Method:~~

~~19.5.2.3.3.~~

~~1 General~~

~~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~~

~~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 .~~

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
Public_Comment_for_NFPA_80_Chapter_19.docx	Public Comment for NFPA 80 19.5.2.3.3	

Statement of Problem and Substantiation for Public Comment

I propose to revise the next edition of NFPA 80 Chapter 19 to redact the remote inspection method section (19.5.2.3.3).

Remote inspection capability routinely fails to give a complete condition report of the damper, and damper environment. Unless a position switch is placed on every blade of each damper, it is possible for the indication device to report a positive closure when in actuality, there is a damaged blade, damaged seal, or even an entire blade missing from the damper. None of these scenarios are out of the range of possibility. For combination fire/smoke dampers, if the seal is damaged, the potential for toxic gas and smoke to penetrate the damper and

pose threat to the lives of occupants and first responders is real.

Some devices rely upon shaft movement to make the switch for indication and not blade movement, further compounding the risk – a linkage may be jammed, disconnected or damaged, causing the device to report positive closure when the damper did not close.

Nothing will mitigate the risk to first responders, occupants and property better than a complete and routine visual inspection. Devices fail, environments change, components require maintenance, and further – the reporting process is proof that all parties are performing their due diligence to keep everyone safe.

Related Item

• Public Input • First Revision

Submitter Information Verification

Submitter Full Name: Melissa Davis

Organization: ITI

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 15:57:49 EDT 2020

Committee: FDW-AAA

I propose to revise the next edition of NFPA 80 Chapter 19 to redact the remote inspection method section (19.5.2.3.3).

Remote inspection capability routinely fails to give a complete condition report of the damper, and damper environment. Unless a position switch is placed on every blade of each damper, it is possible for the indication device to report a positive closure when in actuality, there is a damaged blade, damaged seal, or even an entire blade missing from the damper. None of these scenarios are out of the range of possibility. For combination fire/smoke dampers, if the seal is damaged, the potential for toxic gas and smoke to penetrate the damper and pose threat to the lives of occupants and first responders is real.

Some devices rely upon shaft movement to make the switch for indication and not blade movement, further compounding the risk – a linkage may be jammed, disconnected or damaged, causing the device to report positive closure when the damper did not close.

Nothing will mitigate the risk to first responders, occupants and property better than a complete and routine visual inspection. Devices fail, environments change, components require maintenance, and further – the reporting process is proof that all parties are performing their due diligence to keep everyone safe.

~~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.~~

**Public Comment No. 25-NFPA 80-2020 [New Section after 19.5.2.3.3.1]****TITLE OF NEW CONTENT**

Type your content here ... Physical Visual Inspection is absolutely Critical. Lives dependent on critical systems should have both physical visual inspection and digital confirmation on a very regular basis. Moving backwards does not save lives.

Statement of Problem and Substantiation for Public Comment

Deaths

Related Item

- 19.5.2.3.3.1(B)

Submitter Information Verification

Submitter Full Name: Ben Rivera

Organization: SMW Local 104 JATC

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 11:58:32 EDT 2020

Committee: FDW-AAA

**Public Comment No. 40-NFPA 80-2020 [Section No. 19.5.2.3.3.1]****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. and 19.5.1.2

(C) _

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

Statement of Problem and Substantiation for Public Comment

I write on behalf of the CA Sheet Metal and Air Conditioning Contractors' National Association (CAL SMACNA) on behalf of 300 contractors statewide. As contractors, we see an unacceptably high failure rate of fire and smoke damper systems in occupied buildings everyday. This failure rate places an inordinate amount of risk to the life and safety of building occupants, firefighters and other first responders. Remote sensors are being seen as a means to monitor the functionality of these dampers without performing periodic physical inspections of the dampers. From our experience this would be a tragic mistake. Unfortunately, these systems still fail and in so doing provide a false sense of security to building operators. We feel all fire and smoke dampers equipped with remote sensors will still require physical inspection and visual verification to ensure proper lubricity and functional operability. As such, CAL SMACNA strongly urges you to amend 19.5.2.3.3.1 (B) to also include the elements required under 19.5.1.2. Periodic checks and visual verification of ALL dampers every 4 to 6 years as required is essential for building safety, regardless of the introduction of remote sensing systems.

Related Item

- CI-29-NFPA 80-2019

Submitter Information Verification

Submitter Full Name: Chris Walker
Organization: CAL SMACNA
Affiliation: California Association of Sheet Metal and Air Conditioning Contractors' National Association
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 06 14:41:28 EDT 2020
Committee: FDW-AAA

**Public Comment No. 11-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]****Visual inspection required every test cycle.**

...Visual Inspection shall be required every test cycle. There should never be a remote only option during periodic testing. Remote only testing without visual testing would be only for maintenance or fire (code) authorities to manipulate the damper position.

Statement of Problem and Substantiation for Public Comment

Remote inspection is not thorough enough, especially for older buildings. I've had several smoke dampers where, during testing, the indicator light indicated that the damper had fully closed. However, upon visual inspection, the damper had almost fully closed. Leaving a half inch gap under the blades. This would be enough gap to allow sufficient smoke and toxic gasses through.

Related Item

- Visual Inspection Every Test Cycle

Submitter Information Verification

Submitter Full Name: Darrell Garrison

Organization: International Training Institute

Affiliation: SMART

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 08:07:14 EDT 2020

Committee: FDW-AAA

**Public Comment No. 12-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]****TITLE OF NEW CONTENT**

Are there instances where the control station shows a damper is open, when its actually closed?

Can the control station be manipulated to create false positives on purpose?

Are there instances where only visual inspection would identify a potential problem?

When a damper is equipped with remote inspection capability, should NFPA 80 require a visual inspection between remote inspections?

Statement of Problem and Substantiation for Public Comment

My belief is, not requiring visual inspections of fire and smoke dampers adds a considerable amount of risk to the system that could lead to loss of life.

Related Item

- NFPA 80 19.5.2.3.3.1

Submitter Information Verification

Submitter Full Name: Michael Tipton

Organization: SMART Local 24

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 09:29:54 EDT 2020

Committee: FDW-AAA



Public Comment No. 13-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]

TITLE OF NEW CONTENT

I do hope this is the correct place to make a public comment on remote inspections;

I have grave concerns about the occupants of the buildings if remote testing/ inspections are allowed in NFPA 80. all dampers should be physically inspected and one should not rely on a remote inspection to certify the damper is operating properly. I have seen the splines on actuators stripped or the tension nut loose which allows the actuator to indicate the damper is operating properly when in fact the damper is left open thus leaving the damper ineffective in an event. I strongly encourage the technical committee to revisit this section of this standard and remove remote testing as a possibility.

Statement of Problem and Substantiation for Public Comment

remote inspections open the door for false readings and do not allow a technician to certify with out a reasonable doubt the damper is working properly, the only true method of inspection shall be a visual inspection. there are too many variables which could take play if remote testing is continued to be allowed per NFPA 80.

Related Item

- public safety

Submitter Information Verification

Submitter Full Name: Randy Young

Organization: Jceep

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 09:51:36 EDT 2020

Committee: FDW-AAA



Public Comment No. 14-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]

Physical fire damper inspections

We are opposing the addition of a Remote Inspection Method for dampers

As you are aware, the 2019 edition of NFPA 80 included the addition of a Remote Inspection Method for dampers. Once a damper has been equipped with remote inspection capability, a visual inspection is no longer required – unless the control station indicates a problem with the damper. Here are some questions to consider:

- Are there instances where the control station shows a damper is open when it is actually closed?
- Can the control station be manipulated to create false positives on purpose?
- Are there instances where only a visual inspection would identify a potential problem?
- When a damper is equipped with remote inspection capability, should NFPA 80 require a visual inspection between remote inspections?

Please consider these as possible safety situations that could occur without physically inspecting the operation of fire dampers. Thank you!

Statement of Problem and Substantiation for Public Comment

Knowing without a doubt that fire dampers are working properly by physically making that inspection (observation) rather than relying on remote inspections.

Related Item

- 19.5.2.3.3.1(B)

Submitter Information Verification

Submitter Full Name: Randall Krocka

Organization: SMART SMOHIT

Affiliation: Sheet Metal Occupational Health Institute Trust Inc. (SMOHIT)

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 10:02:28 EDT 2020

Committee: FDW-AAA

**Public Comment No. 16-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]****TITLE OF NEW CONTENT**

Type your content here ... It is imperative to visually check a Damper and not rely on switches and relays that can be easily overridden. Dampers can be stuck open or forced open manually and can only be seen visually. The condition of the damper internals cannot be inspected without a visual look.

Thank you,

Thomas J. Blotzke

25 year Sheet Metal Worker/Service Technician. 775-560-7962

Statement of Problem and Substantiation for Public Comment

A Visual inspection of Dampers is Required.

Related Item

- first draft report

Submitter Information Verification

Submitter Full Name: Thomas Blotzke

Organization: nnsmwiajatc

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 11:08:42 EDT 2020

Committee: FDW-AAA

**Public Comment No. 19-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]****TITLE OF NEW CONTENT Public Comment**

Type your content here ...

As a HVAC technician for the past 37 years I have concerns that by allowing remote testing of smoke fire dampers that is being proposed in the next version of NFPA 80 could result in false positives and failures. A shaft could slip on the actuator or on a multiple blade damper one or more of the blades could fail without being detected. Therefore, I believe the only way to assure that the damper is working properly is to have a visual inspection.

Statement of Problem and Substantiation for Public Comment

As a HVAC technician for the past 37 years I have concerns that by allowing remote testing of smoke fire dampers that is being proposed in the next version of NFPA 80 could result in false positives and failures. A shaft could slip on the actuator or on a multiple blade damper one or more of the blades could fail without being detected. Therefore, I believe the only way to assure that the damper is working properly is to have a visual inspection.

Related Item

- NFPA 80

Submitter Information Verification

Submitter Full Name: David Dias

Organization: Sheet Metal Workers Local 104

Affiliation: Sheet Metal Workers Local 104

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 11:42:16 EDT 2020

Committee: FDW-AAA

**Public Comment No. 22-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]****I am writing this comment in opposition to the use of remote inspection method dampers.**

It has been in my 30yrs experience within the HVAC industry to have witnessed many mechanical failures of all types. Life Safety Systems such as fire and or fire smoke dampers should always be visually inspected to confirm that all moving components are in proper working order and that the dampers are free from obstructions. To reduce the integrity of a visual safety inspection allows a greater chance of fatal consequences. It is for these reasons I am asking for the next edition of NFPA 80 to include responsible requirements for inspections and for public safety.

Dion Abril

Western States Council.

Statement of Problem and Substantiation for Public Comment

Not to allow a remote inspection device to confirm a life safety dampers

Related Item

- NFPA 80 remote inspections

Submitter Information Verification

Submitter Full Name: Dion Abril

Organization: SMART WSC

Affiliation: Western States Council SMART

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 11:48:18 EDT 2020

Committee: FDW-AAA



Public Comment No. 23-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]

Remote Testing Method

On behalf of the International Association of Sheet Metal, Air, Rail and Transportation Workers, Sheet Metal Workers' Local Union No. 104, which encompasses approximately two thirds of the state of California, I am writing to express our serious concerns with the 2019 NFPA 80 Remote Inspection Method. Everyday, Local 104 members are seeing and repairing faulty fire and smoke dampers. **Visual inspections are paramount** in order to prevent inevitable catastrophes in buildings.

We recognize and appreciate your commitment to NFPA Codes & Standards, intended to minimize the possibility and effects of fire and other risks. We also recognize and welcome technology that has the potential to increase public safety in buildings; however we believe any changes must be thoroughly vetted. We stand ready to provide verifiable data and commitments concerning the 2019 NFPA 80 Remote Inspection Method. We are reminded daily of the unintended consequences of new products/technologies that the public has been told are safe. Surrounded by the present Covid-19 environment, day by day we read headlines detailing the devastating results of the inconsistencies in policies and statements that result in devastating consequences to public health. During this pandemic we continue to learn many lessons, one of which is the need of verification. now is not the time to cut corners, now is the time to demonstrate the need for far more detailed research and discussion.

The 2019 NFPA 80 Remote Inspection Method changes the requirement of 100% visual inspection of dampers to 0%. Given the reality of mechanical failures, it is our opinion that the current requirements of 4 or 6 years between visual verification are too lax. Allowances for remote inspections result in increased installations, with limited or no viable access. Attempts to repair inaccessible devices upon failure will be costly and can result in more examples of damper tampering, as opposed to proper replacement.

Even if the remote inspection method is 98% accurate, a 2% failure rate for a life safety device is not acceptable. When it comes to life safety the current requirements of 4 or 6 years between visual verification should not be looked at as a burden, but rather as a solution that ensures the safety of the public and our first responders. It is for these reasons and more that Sheet Metal Workers' Local Union No. 104 convey our serious concerns with the 2019 NFPA 80 – Remote Inspection Method.

I welcome the opportunity to be involved in future NFPA 80 Technical Committee discussions and decisions.

Respectfully submitted,

Rob Stoker

robs@smw104.org

Statement of Problem and Substantiation for Public Comment

Given the reality of mechanical failures, it is our opinion that visual verification is a matter of life and death.

**Related
Item**

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

Submitter Information Verification

Submitter Full Name: Rob Stoker

Organization: SMART Sheet Metal Workers 104

Street Address:

City:

State:

Zip:

Submittal Date:	Wed May 06 11:49:54 EDT 2020
Committee:	FDW-AAA

**Public Comment No. 24-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]****TITLE OF NEW CONTENT**

Type your content here ... I believe that a sensor to control a damper would not be a good thing.
After over 30 years of installing and inspecting fire and smoke dampers I have saw many
situations where fire dampers were installed improperly. So if just a sensor was used we could of
have had many fire damper failures over the years. a sensor could go bad but show good electrical
parts have a chance to fail between inspections. We feel that a person should be inspecting a
life saving device not a electrical or mechanical disconnect.
Best,

Additional Proposed Changes

<u>File Name</u>	<u>Description Approved</u>
.1588787959467	

Statement of Problem and Substantiation for Public Comment

We need to keep the standard as it is now no changes
stay with visual and physical inspections only.

Related Item

- Fire dampers

Submitter Information Verification

Submitter Full Name: Mark Huddy
Organization: [coleman spohn Not Specified]
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 06 11:58:26 EDT 2020
Committee: FDW-AAA

**Public Comment No. 28-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]**

I oppose remote inspection of dampers in its entirety

In my nearly 20 years as a Sheet Metal Worker, I have had to replace many Fire Smoke Dampers, Individual blades, and Motors.

A "Remote Inspection" would not replace the visual aid of a properly trained individual doing a Physical visual inspection.

All Mechanical items will fail eventually and need to be replaced. It would be very unfortunate if a "remote Test" fails when the lives of the public are at stake. Any failure would not be the proper course of action.

Even if the "Remote Test" showed the motor is actuating, there will be no Visual eyes on the Damper blades, to see if everything is working as intended.

In Conclusion, I oppose any sort of Remote inspection of Dampers.

Statement of Problem and Substantiation for Public Comment

I oppose remote inspection of dampers in its entirety

In my nearly 20 years as a Sheet Metal Worker, I have had to replace many Fire Smoke Dampers, Individual blades, and Motors.

A "Remote Inspection" would not replace the visual aid of a properly trained individual doing a Physical visual inspection.

All Mechanical items will fail eventually and need to be replaced. It would be very unfortunate if a "remote Test" fails when the lives of the public are at stake. Any failure would not be the proper course of action.

Even if the "Remote Test" showed the motor is actuating, there will be no Visual eyes on the Damper blades, to see if everything is working as intended.

In Conclusion, I oppose any sort of Remote inspection of Dampers

Related Item

- first draft report 19.5.2.3.3.1

Submitter Information Verification

Submitter Full Name: Michael Mark

Organization: Sheet Metal Workers Local 104

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 12:15:12 EDT 2020

Committee: FDW-AAA



Public Comment No. 29-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]

TITLE OF NEW CONTENT

Type your content here ... As a HVAC Installer/Technician for the past 33 years I have some concerns regarding the following sections.

NFPA 105,2019 7.6.3.3 Remote Inspection Method and NFPA 80,2019 19.5.2.3.3 Remote Inspection Method. Going from a 100% visual inspection to 0% would not be safe. Building owners are lucky to inspect their dampers every 5 years and in my experience that is far to long between inspections given all the mechanical failure I have witnessed over the years, such as dampers reading they are closing properly when they are stuck open ,broken blades, bent shafts, failed electronics. There are too many issues that can arise if the dampers are not visually inspected on a regular basis. With this being a Fire/Life and Safety issue I strongly ask you reconsider your proposed code change.

Statement of Problem and Substantiation for Public Comment

Visual Inspections

Related Item

- Public Safety

Submitter Information Verification

Submitter Full Name: Keith Dias

Organization: SMW Local 104

Affiliation: SMART Local 104

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 12:16:24 EDT 2020

Committee: FDW-AAA



Public Comment No. 32-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]

After seeing the 2019 NFPA 80 and 105 I have concerns regarding the following sections:

- NFPA 105, 2019
 - 7.6.3.3 Remote Inspection Method
- NFPA 80, 2019
 - 19.5.2.3.3 – Remote Inspection Method

Topics for committee to review and possibly address:

- Going from 100% visual inspection of dampers to 0%, why so drastic?
 - 4 or 6 years between visual verification is already too long given the reality of mechanical failures.
- Failures of remote dampers never being found:
 - False positives
 - Failures
 - Electronics
- Mechanical devices that have unlimited life with no maintenance?
- Allowance for Remote Inspection result in increasing installations with limited or no viable access.
Attempts to repair inaccessible devices after failures will be expense with no access such as removing walls, window, bricks, beams etc.
- Even if the Remote Inspection Method is 98% accurate, a 2 % failure rate for a life safety device is not acceptable.
- Per the NFPA 80 and 105, physical maintenance, is still required. Why not require a visual verification of the damper operation during the maintenance?
 - NFPA 105, 19.6.2
 - All exposed moving parts of the damper shall be dry lubricated as required by the manufacturer.
 - NFPA 80, 7.7.2
 - All exposed moving parts of the damper shall be dry lubricated as required by the manufacturer.

Conclusion :

- Personally, seeing and repairing so many dampers in my region, I see faulty fire and smoke dampers as one of the primary safety issues and inevitable catastrophes in existing buildings.

- I would like to be involved and informed in future NFPA 80 and 105 Technical Committee discussions and decisions.

Statement of Problem and Substantiation for Public Comment

- Personally, seeing and repairing so many dampers in my region, I see faulty fire and smoke dampers as one of the primary safety issues and inevitable catastrophes in existing buildings.

Related Item

-

Submitter Information Verification

Submitter Full Name: Linda Jennings

Organization: SMACNA of San Diego

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 12:34:32 EDT 2020

Committee: FDW-AAA

**Public Comment No. 33-NFPA 80-2020 [New Section after 19.5.2.3.1(B)]****TITLE OF NEW CONTENT**

While I support technology advancements to help protect life, I cannot support this method of remote testing as prescribed in 19.5.2.3.3 without a visual confirmation used every time a test is performed. In my 25 years of HVAC and Mechanical experience, and in my many more of the auto racing environment, I have seen to many failures of a system of this type that relies 100% on mechanical switches and digital information transfer without the physical and visual confirmation of a technician. NFPA 80 must continue to utilize 19.5.2.3.2 as the primary method of proving a life saving device is working as it was designed and installed to do. Should the Remote Inspection Method be used as a stand alone tool without a annual Visual Inspection, one cannot say with certainty that the NFPA 80 includes responsible requirements for public safety.

Statement of Problem and Substantiation for Public Comment

The potential unseen failure will be avoided by maintaining a visual inspection method as part of any testing method.

Related Item

.

Submitter Information Verification

Submitter Full Name: eric haynes

Organization: smart smw lu104

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 12:42:03 EDT 2020

Committee: FDW-AAA



Public Comment No. 35-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]

TITLE OF NEW CONTENT

My name is Jens Schurig, with SMART International, and I am a certified technician to test, inspect, maintain, repair, and replace fire dampers, smoke dampers, and combination fire-smoke dampers.

I have 6 years of experience testing and inspecting thousands of life-safety dampers and I am in opposition of eliminating certified technicians to be replaced with remote testing. I discovered the vast malfunctions that occur. I can confidently say that because mechanical parts fail, such as actuators, linkages, springs, high limits, gaskets, and sensors, replacing a certified technician with a device is unacceptable. Please reconsider using remote inspection devices as a primary means to test and inspect fire dampers, smoke dampers, and combination fire-smoke dampers so that our trained, certified technicians can continue to accurately and thoroughly test, inspect, and maintain these crucial life-safety dampers to save lives.

—

Statement of Problem and Substantiation for Public Comment

Mechanical devices fail. So it is unacceptable to replace an actual technician with a device that we all know is going to eventually fail.

Related Item

- CI-29-NFPA 80-2019

Submitter Information Verification

Submitter Full Name: Jens Schurig

Organization: SMART

Affiliation: Local 23

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 12:55:21 EDT 2020

Committee: FDW-AAA

**Public Comment No. 36-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]****NFPA 80**

After 35 years as a Test and Balance Technician I have many incidents where I would run into countless number of dampers that have been broken and in the closed position undetected for years. Per NFPA 80 and 105 physical maintenance is still required, but is not being performed in many cases, so a physical inspection is crucial in finding the neglected dampers that would ultimately be left unchecked.

Checking these dampers remotely vs. physical inspection is a dangerous

and ultimately costly game that will put public lives at risk. All we need to do is look back on incidents that have been reported on in the news that have been disasters in a lack of attention to Fire Life Safety Systems

Statement of Problem and Substantiation for Public Comment

Physical inspection will save lives....the loss of life in the past could have been avoided by simply having verbiage included requiring physical inspection in NFPA 80

Related Item

- NFPA 80 19.5.2.3.3.1(B)

Submitter Information Verification

Submitter Full Name: Scott Brehmer

Organization: No CA Valley SMWTC

Affiliation: Sheet Metal Workers Local 104

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 13:29:09 EDT 2020

Committee: FDW-AAA

**Public Comment No. 37-NFPA 80-2020 [New Section after 19.5.2.3.1(B)]****TITLE OF NEW CONTENT**

I took notice of the 2019 NFPA 80 and 105 and led to my concern of sections NFPA 105,2019-7.6.3.3 Remote Inspection Method , and NFPA 80,2019-19.5.2.3.3 Remote Inspection Method. Going from 100% visual inspection of dampers to 0%, why so drastic? Also, Failures of remote dampers never being found(Failures positive,Failures, Electronics). Allowance for Remote Inspection result in increasing installations with limited or no viable access, attempts to repair inaccessible devices after failure will be expense with no access such as removing walls, windows, bricks, beams etc.

I conclude with stating, faulty fire and smoke dampers as one of the primary safety issues and inevitable catastrophes in existing buildings. I would like to be informed of future NFPA 80 and 105 Technical Committee discussions and decisions.

Additional Proposed Changes

<u>File Name</u>	<u>Description Approved</u>
.1588792824661	search

Statement of Problem and Substantiation for Public Comment

Remote Inspection Method would not reflect any failures if there is an issue. A needed visual inspection would give an actual testimony for a complete inspection.

Related Item

- responsible requirements for public safety.

Submitter Information Verification

Submitter Full Name: Brian Germain

Organization: [Not Specified]

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 13:47:07 EDT 2020

Committee: FDW-AAA



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

NFPA 80 Public Comment - Tony Shell

Submitted on behalf of Tony Shell. tshell@intech-mech.com -- Tony was unable to submit due to inability to log on.

I have a situation that happened a few months ago where building maintenance did a test on the fire life safety system after the test was complete and the panel showed all operational they turned the systems back on and found a pressure problem in one part of the building after further visual inspections they found a 68 by 34" fire damper still closed when the panel showed it was open. At that time the maintenance crew climbed up into the duct work and prided the fire damper blades open rendering this fire damper useless. After that they called our company to inspect and replace the fire damper. It is my opinion that remote testing is not the best inspection method for fire dampers. This was a very costly mistake for this building owner.

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
20191112_101615.jpg	Picture of Damper 2	
Screenshot_20191112-101639_Gallery.jpg	Picture of Damper 1	

Statement of Problem and Substantiation for Public Comment

Remote damper inspections without physical verifications will miss critical faults.

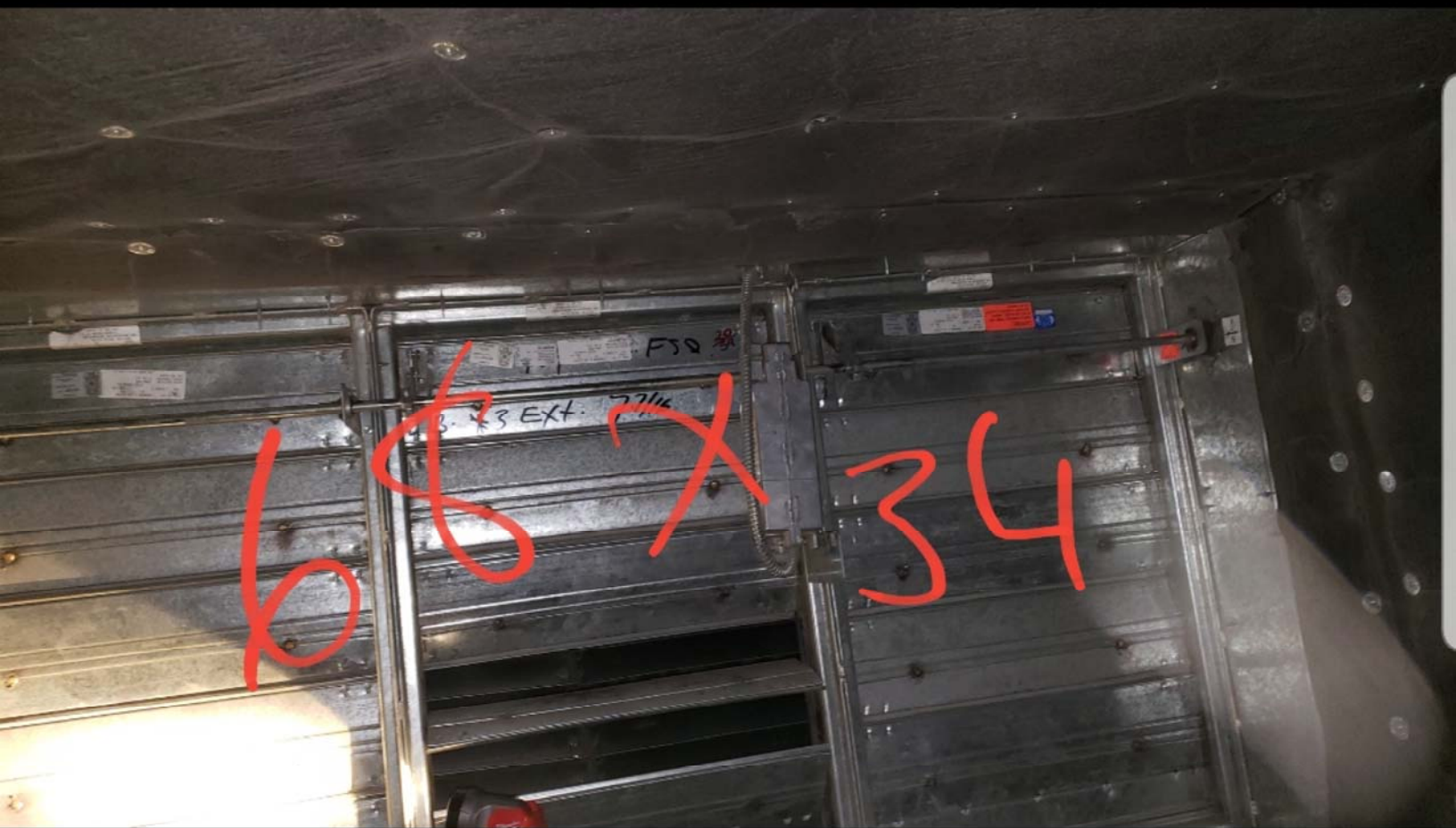
Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 39-NFPA 80-2020 [New Section after 19.5.1.3]	
<u>Related Item</u>	
• 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 14:05:33 EDT 2020
Committee: FDW-AAA







Public Comment No. 45-NFPA 80-2020 [New Section after 19.5.2.3.3.1(B)]

I oppose Remote Inspection Methods for dampers

Controls stations may show a damper is open when it is actually closed. A control station can be manipulated to create false positives on purpose. There are instances when only a visual inspection would identify a potential problem. When a damper is equipped with remote inspection capability, should NFPA 80 require a visual inspection between remotw inspection

Statement of Problem and Substantiation for Public Comment

Do not allow remote inspection

Related Item

.

Submitter Information Verification

Submitter Full Name: Abel Cortinas

Organization: Sheet Metal Worker

Affiliation: SMART Local 105

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 15:39:48 EDT 2020

Committee: FDW-AAA

**Public Comment No. 8-NFPA 80-2020 [New Section after 19.5.2.3.1(B)]**

-
The initial remote inspection shall include a visual inspection of the damper in accordance with 19.5.2.3.2. A visual inspection shall be required between remote inspections.

Statement of Problem and Substantiation for Public Comment

The only way to verify that proper access to these devices has been properly maintained over the life cycle of a building is by visual inspection of the damper. Only by visually inspecting these devices on a regular interval can we ensure that timely repairs or replacements can be achieved if needed.

Alternatively, long and costly delays in repairs caused by possible compounded obstructions gone unchecked over decades (by way of construction alterations above the ceiling cavity) could be the difference in whether a fire event in a building is a nuisance, or becomes a deadly catastrophe for its occupants and First Responders.

There is a reason that damper access doors and service clearances to actuators are required by municipal codes. Making sure that those requirements are maintained throughout the life of the damper is crucially important to the "replace/repair without delay" directives of the Fire Code. Periodic visual inspections will not only confirm that are we not receiving false positives or negatives at the FLS panel, but that proper access to these life saving devices can be maintained in case a repair is needed "without delay".

Related Item

- periodic inspections

Submitter Information Verification

Submitter Full Name: Will Scott

Organization: SMART Local Union 105

Street Address:

City:

State:

Zip:

Submission Date: Tue May 05 19:18:59 EDT 2020

Committee: FDW-AAA

**Public Comment No. 9-NFPA 80-2020 [New Section after 19.5.2.3.1(B)]****TITLE OF NEW CONTENT Inspection**

Type your content here .

1. Should dampers be visually inspected to insure immediate replacement of defective dampers?.
2. Are there instances where only a visual inspection would identify a potential problem ?

Additional Proposed Changes**File Name****Description Approved**

.1588735517869

Statement of Problem and Substantiation for Public Comment

A visual inspection would enable a certified tech to replace a defective damper asap
A visual inspection could find defective multiple dampers

Related Item

- A visual inspection by a certified tech will enable a high quality inspection

Submitter Information Verification

Submitter Full Name: bob dak

Organization: Local 105

Street Address:

City:

State:

Zip:

Submittal Date: Tue May 05 23:16:24 EDT 2020

Committee: FDW-AAA

**Public Comment No. 21-NFPA 80-2020 [Section No. 19.5.2.3.3.1(B)]****(B)**

The initial remote inspection shall include a visual inspection of the damper in accordance with 19.5.2.3.2. Further inspections shall be in accordance with Section 19.5.1.2.

Statement of Problem and Substantiation for Public Comment

Remote inspection without visual do not prove the damper actually fully closed and or opened if debris such as cable is within the path of the blade, even though a signal may be sent stating closure. No material is permitted to be within the fire damper as this would render the test false and further cause potential de-listing of the fire damper.

Related Item

- Revision to NFPA 80 to mandate physical testing of any/all fire dampers in accordance with Section 19.5.1.2

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 11:44:22 EDT 2020**Committee:** FDW-AAA

**Public Comment No. 10-NFPA 80-2020 [Section No. L.1.2.2]****L.1.2.2** ASTM Publications.

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

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

ASTM E90, *Standard Test Method for Laboratory Measurement of Airborne Sound Transmission Loss of Building Partitions and Elements*, 2009, reapproved 2016.

ASTM E119, *Standard Test Methods for Fire Tests of Building Construction and Materials*, 2018ce4 2019 .

ASTM E413, *Classification for Rating Sound Insulation*, 2016.

Statement of Problem and Substantiation for Public Comment

date update for ASTM E119

Related Item

- pi38

Submitter Information Verification

Submitter Full Name: Marcelo Hirschler

Organization: GBH International

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 06 01:04:26 EDT 2020

Committee: FDW-AAA



Committee Input No. 30-NFPA 80-2019 [Global Input]

See committee statment.

Submitter Information Verification

Committee:

Submittal Date: Thu Nov 14 16:11:46 EST 2019

Committee Statement

Committee Statement: There is an ongoing Fire Protection Research Foundation (FPRF) project researching the effects of door gap size under and around swinging fire doors with builders hardware. The committee would like to reassess the permitted clearances in 4.8.4 and 6.3.1.7 based on results of the FPRF project.

Response Message: CI-30-NFPA 80-2019



Committee Input No. 34-NFPA 80-2019 [Global Input]

Task group to review attached editorial changes.

Supplemental Information

File Name	Description Approved
80_FR_EditorialFINAL.docx	

Submitter Information Verification

Committee:

Submittal Date: Thu Nov 14 18:10:42 EST 2019

Committee Statement

Committee Statement:	Due to the extensive nature of the editorial changes, a task group has been formed to review the changes to confirm that the changes do not constitute any technical changes.
Response Message:	CI-34-NFPA 80-2019

Coordinate all section numbers with First Draft Report prior to submitting for changes at second draft.

#	Proposed Change	Substantiation/Notes	Notes to Editorial
1	4.2.2* New fire protection-rated and fire resistance-rated glazing shall be marked in accordance with Table 4.2.2, and such 4.2.3 Markings <u>Markings required by 4.2.2</u> shall be permanently affixed.	NFPA MOS does not permit multiple requirements within a single section.	Create new section 4.2.3 and renumber subsequent sections.
2	4.3.5* Rolling steel fire doors shall be <u>both of the following</u> : (1) Labeled and shall be (2) 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. Coordinate with CI-34	
3	4.3.8 Service counter doors shall <u>comply with both of the following</u> : (1) Be of the single- or two-speed counterbalanced types of flush design or the rolling steel type of formed steel and shall (1)(2) Include wall guides, frame, sill, latching, and counterbalancing mechanism.	NFPA MOS does not permit multiple requirements within a single section. Coordinate with CI-34	
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 4.3.9.2 Oversized fire doors shall <u>comply with one of the following</u> : (1) Bear a label by an approved agency or shall (1)(2) 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. Coordinate with CI-34	Create new 4.3.9.2 and renumber subsequent sections.
5	4.4.3* Glazing Materials in Vision Panels. 4.4.3.1. Glazing materials in vision panels shall <u>be both of the following</u> : (1) be installed in labeled glass light kits or in accordance with the fire door listing and shall be (1)(2) Installed in accordance with the manufacturer's installation instructions. 4.4.3.12* For new wood doors, glazing materials in vision panels shall <u>be both of the following</u> : (1) Installed in labeled glass light kits or in accordance with the fire door listing and shall be (1)(2) 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. TG to review/recommend header.	Create new 4.4.3.1 and renumber subsequent sections.

#	Proposed Change	Substantiation/Notes	Notes to Editorial
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 <u>Maximum shall be limited in size and area shall be</u> 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 m²) with no dimension exceeding 54 in. (1.37 m) unless otherwise tested.	NFPA MOS does not permit multiple requirements within a single section. Coordinate with CI-34	Create new 4.4.5.1 and renumber subsequent sections.
7	4.6.2-13 Fire exit hardware shall be within the category of builders hardware.	NFPA MOS does not permit single subsections. Coordinate with CI-34	Create new 4.6.3 and renumber subsequent sections.
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 <u>to do all of in accordance with</u> 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, <u>not that shall not</u> 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 Placement of heat detectors shall <u>comply with the following</u>: (1) B be placed as shown in Figure 4.7.3.1(a) and Figure 4.7.3.1(b); (1)(2) but in no event shall detectors <u>Never</u> 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. Coordinate with CI-34	
10	4.7.4.3* Where fusible links are used, <u>links shall be located in accordance with the following</u>: (1) O ne fusible link shall be located near the top of the opening, and (1)(2) a Additional links shall be located at or near the ceiling on each side of the wall.	NFPA MOS does not permit multiple requirements within a single section.	
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.	Create new 4.8.1.3 and renumber subsequent sections.
12	4.8.2.6* Where frames have a greater jamb depth, the sills shall <u>comply with both of the following</u>: (1) h Have a minimum width of 4 in. (102 mm) and shall (1)(2) b 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.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
13	4.8.2.9* For horizontally sliding fire doors and vertically sliding fire doors, sills shall <u>comply with both of the following</u> : (1) b <u>e</u> constructed of noncombustible material and shall (1)(2) <u>e</u> Extend 6 in. (152 mm) past the edge of the opening on each side and 4 in. (102 mm) out from the face of the wall.	NFPA MOS does not permit multiple requirements within a single section.	
14	4.8.2.10 Rolling Steel Fire Doors. For rolling steel fire doors, sills <u>comply with all of the following</u> : (1) shall b <u>e</u> constructed of noncombustible material, shall (2) <u>e</u> Extend past each jamb as necessary to be completely under the guides, and shall (1)(3) <u>e</u> 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.	
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: (1) Expansion anchors shall be manufactured from steel and shall be either zinc-coated or cadmium-coated. (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). (3) The compressive strength of the concrete shall not be less than 2000 psi (13,790 kPa), and (3)(4) the <u>The</u> bolt load shall not exceed 1/4 of the proof test load. (4)(5) Where used in brick or filled concrete masonry unit walls, the bolt load shall not exceed 1/12 of the proof test load. (6) (5) 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. (5)(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. <u>Coordinate with CI-34</u>	
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. <u>Is heading necessary?</u>	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
18	5.2.4.6* Hardware shall be examined, and if inoperative hardware, parts, or other defective items shall be replaced without delay.	NFPA MOS does not permit multiple requirements within a single section. Is this redundant w/ 5.2.3?	
19	5.5.1* Repairs shall be made, and defects that could interfere with operation shall be corrected without delay.	NFPA MOS does not permit multiple requirements within a single section.	
20	6.1.3.2.1 Self-closing doors shall <u>comply with both of the following:</u> (1) s Swing easily and freely and shall (1)(2) b Be equipped with a closing device to cause the door to close and latch each time it is opened.	NFPA MOS does not permit multiple requirements within a single section.	
21	6.1.3.3 Automatic-Closing Doors. 6.1.3.3.1 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 6.1.3.3.1-2 The fire door shall latch upon closure.	NFPA MOS does not permit single subsections.	Create new 6.1.3.3.1 and renumber subsequent sections.
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 <u>for door frames complying with 6.3.1.3</u> shall be secured in accordance with the manufacturer's instructions.	NFPA MOS does not permit multiple requirements within a single section.	Create new 6.3.1.4 and renumber subsequent sections.
23	6.4.3.1.2.2 Spring hinges shall be labeled and 6.4.3.1.2.3 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.	Create new 6.4.3.1.2.3 and renumber subsequent sections.
24	6.4.3.1.5.2 Where only intermediate pivots are used, <u>the following shall apply:</u> (1) t Two intermediate pivots shall be provided for door leaves up to 60 in. (1.52 m) in height, and an (1)(2) a Additional intermediate pivots 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.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
25	6.4.3.1.7 Continuous hinges shall be labeled. and 6.4.3.1.8 Continuous hinges shall meet the requirements of ANSI/BHMA A156.26, American National Standard for Continuous Hinges.	NFPA MOS does not permit multiple requirements within a single section.	Create new 6.4.3.1.8.
26	6.4.3.2.3 Mortise hinges shall be secured to wood and plastic-covered composite doors or wood core doors <u>shall comply with both of the following:</u> (1) Hinges shall be secured with No. 12 × 11/4 in. (31.75 mm) flat, threaded-to-the- head, steel wood screws. (1)(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.	
27	6.4.4.4 For pairs of doors Where both leaves are required for exit purposes, <u>the following shall apply:</u> (1) Both leaves shall be provided with labeled fire exit hardware. (1) 6.4.4.4.1 (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	6.4.4.5 For Where a pairs of doors is needed for the movement of equipment and where the inactive leaf of the pair of doors is not required for exit purposes, <u>the following shall apply:</u> (1) Labeled , top and bottom, self-latching or automatic flush bolts, or labeled two-point latches shall be permitted. (1) (2) 6.4.4.5.1 *Where permitted by the AHJ, M 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.	Reassociate annex for 6.4.4.5.1 to 6.4.4.5(2).
29	6.4.4.7.1 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. 6.4.4.7.2 21.1 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.	Move section up one level and renumber subsequent sections.
30	6.4.4.7.3 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.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
31	6.4.4.9 <u>The following shall apply to</u> Strike plates for doors swinging in pairs: (1) Plates shall be secured to reinforcements in the inactive leaf with machine screws. (1) Plates (2) 6.4.4.9.1 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. All components shall be <u>both of the following</u> : (1) Installed in accordance with the manufacturers' installation instructions and shall be (1)(2) a Adjusted to function as described in the listing.	NFPA MOS does not permit multiple requirements within a single section.	
33	7.1.3.3 Lap-mounted doors shall <u>comply with both of the following</u> : (1) Be hung on the surface of the wall and shall (1)(2) 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	7.2.4.3 The metal covering around the opening shall be secured with small nails spaced about 1 in. (25.4 mm) apart, and the 7.2.4.4 e Exposed wood shall be painted thoroughly.	NFPA MOS does not permit multiple requirements within a single section.	Create new 7.2.4.4.
35	7.4.3.2 Components. 7.4.3.2.1 Fire door hardware shall include hinge brackets, hinges, latches, latch keepers, and operating handle mechanisms, and 7.4.3.2.2 H Hardware for an inactive door or pairs of doors shall include top and bottom bolts and keepers.	NFPA MOS does not permit multiple requirements within a single section.	
36	8.2.1.2* Walls shall be of brick, concrete, or concrete masonry construction except that where tin-clad doors are used on hollow concrete masonry units, the 8.2.1.3 w Wall openings 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.	Create new 8.2.1.3 and renumber subsequent sections.
37	8.4.1 Closing Devices. 8.4.1.1 <u>Doors shall be closed at the time of fire.</u> 8.4.1.2 Doors shall be equipped with self-closing or automatic-closing devices, to ensure that they shall close or be closed at the time of a fire. 8.4.1.1.13* 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.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
38	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 <u>actuated</u> at the time. 8.4.2.1.3 Actuation shall be 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 allow <u>s</u> the door to be disconnected and closed.	NFPA MOS does not permit multiple requirements within a single section.	Create new 8.4.2.1.3 and renumber subsequent sections.
39	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 <u>binder</u> shall be required at the head unless otherwise listed.	NFPA MOS does not permit multiple requirements within a single section.	Create new 8.4.3.5.2 and renumber subsequent sections.
40	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 hold <u>s</u> 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.	
41	9.1.3.2 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.	
42	9.1.3.3* 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. 9.1.3.4 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.	
43	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.	
44	10.2.4.2 <u>The number of vents shall comply with the following:</u> <u>(1)</u> Doors up to 6 ft (1.83 m) wide shall be provided with three vents. and <u>(1)(2)</u> 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.	
45	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.	
46	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 <u>A</u> governor shall control the rate of descent.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
47	10.4.3.1.4.2 Cable brackets shall be required, and 10.4.3.1.4.3 Required cable brackets shall be bolted through the door.	NFPA MOS does not permit multiple requirements within a single section.	
48	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.	
49	10.4.3.2.4 Interlocking. 10.4.3.2.4.1 An angle-type interlock shall be bolted to the lintel, and 10.4.3.2.4.2 Require angle-type interlocks shall engage 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.	
50	11.4.2.2.2 When automatic closing is accomplished by means of a power operator, the door shall remain in the closed position <u>until the closing device has been reset, unless otherwise permitted by 11.4.2.2.3.</u> 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 devices is designed shall be permitted to automatically open and reclose when encountering an obstructions <u>where the device complies with the following:-</u> (1) 1 The unit shall be designed such that it can reopen a maximum of three times. (1) (2) 11.4.2.2.3.1 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. These sections appear redundant, consolidated the requirements.	
51	13.4.2 A service counter fire door of the rolling type shall be automatic closing so that, upon activation <u>of a detector</u> or release of a fusible link or detector, causes the door shall close. 13.4.3 A service counter fire door of the swinging or sliding type 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 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.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
52	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.	Create new 14.2.1.3.3 and renumber subsequent sections.
53	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 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. 14.2.2.3.4-1 Labels 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.	NFPA MOS does not permit multiple requirements within a single section and single subsections.	Create new 14.2.2.3.3 and move 14.2.2.3.2.1 up one level and renumber subsequent sections.
54	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 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. 14.2.3.4-16 Labels 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). ... 14.2.3.6-8 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.	NFPA MOS does not permit multiple requirements within a single section and single subsections. Is the second clause is 14.2.3.8 required with the addition of 14.2.3.5?	Add new 14.2.3.5 and renumber subsequent sections.
55	15.1 Chute Discharge Doors. 15.1.1-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, other sections are extracted so header has to be deleted. Does TC was to retile 15.1?	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
56	15.2 Chute Intake Doors. 15.2.1 General Access Gravity Waste Chutes. 15.2.1.2 All chute intake doors into a waste chute shall be provided with a self-closing , and positive latching and gasketed fire door assembly in accordance with 15.1.2. [82:6.2.3.3.1.1] 15.2.1.3 The fire door assembly shall be installed in accordance with its listing. [82:6.2.3.3.1.2] 15.2.1.4 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]	NFPA MOS does not permit single header in section. Recommend either deleting header or numbering sections.	Delete 15.2.1 and renumber all subsections accordingly.
57	16.1.2.4 Access doors shall be self-latching, <u>unless otherwise permitted by 16.1.2.5.</u> 16.1.2.54.1 A h Horizontal access doors that does-do not open downward and that remains in place when an upward force of 1 lb/ft ² (48 N/m ²) 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.	Create new 16.1.2.5 and renumber subsequent sections.
58	16.2.1.1 Door assemblies used in fire resistance-rated floor-ceiling or roof-ceiling assemblies shall be <u>both of the following:</u> <u>(1) 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 shall be</u> <u>(1)(2) Labeled as horizontal access doors.</u>	NFPA MOS does not permit multiple requirements within a single section.	
59	16.2.2.43.1 Such an access d Door 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.	Create new 16.2.2.4 and renumber subsequent sections.
60	17.2.3.2 The label or other identification shall be permanently applied <u>and shall be in a location</u> visible after installation.	NFPA MOS does not permit multiple requirements within a single section.	
61	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. Either delete or add to 17.3.1.2/3.	
62	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.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
63	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 the ventilator to close.	NFPA MOS does not permit multiple requirements within a single section.	
64	19.3.4 Documentation. 19.3.4.1 A record of A all inspections and testing shall be documented <u>provided that includes the following information:-</u> indicating the (1) l ocation of the fire damper, (2) d ate(s) of inspection, (3) n ame of inspector, and (4) d eficiencies discovered. 19.3.4.2 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. This change makes the formatting more consistent with Chapter 5. Coordinate with FR-45	
65	19.4.4.2 The damper shall then be manually reset to its full-open position and the fusible link shall be reinstalled.	NFPA MOS does not permit multiple requirements within a single section.	
66	19.5.1.2 The test and inspection frequency <u>for dampers shall comply with one of the following:</u> (1) shall then be e Every 4 years, (1)(2) <u>Every 6 years, except</u> in buildings containing a hospital, where the frequency shall be every 6 years.	NFPA MOS does not permit multiple requirements within a single section. Coordinate with FR-25	
67	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 damper shall be installed per the manufacturer's installation instructions for retrofitted equipment.	NFPA MOS does not permit multiple requirements within a single section. TC to review - this section appears to be out of place as it is under the headers "Periodic Testing"/"Testing Frequency"	
68	19.5.2.2.6 At the completion of the test <u>both of the following shall be done:-</u> (1) T he damper shall be returned to the full-open position, and t (1)(2) <u>T</u> he fusible link shall be reinstalled or replaced.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
69	19.5.2.3.2 Visual Inspection Method. <u>A visual inspection shall include all of the following actions:</u> (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.	
70	19.5.3.1 <u>A record of</u> All inspections and testing shall be documented <u>provided that includes the following information:- indicating t</u> (1) the <u>Location of the damper,</u> (2) the <u>Date of inspection,</u> (3) the <u>Name of inspector, and</u> (4) the <u>Deficiencies discovered.</u> 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.	
71	20.1.3.2 The assembly designer shall be identified on the system design documents. 20.1.3.3 Evidence of qualifications <u>of the assembly designer</u> shall be provided when requested by the AHJ.	NFPA MOS does not permit multiple requirements within a single section.	
72	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 <u>Noncombustible base fabric</u> 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.	Add new 20.2.1.2 and renumber subsequent sections.
73	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, <u>unless permitted by 20.2.1.14.4.</u> 20.2.1.14.4 Framed curtains shall not require a pocket if they meet the requirements of 20.2.1.11. 20.2.1.14.54 <u>During the test period, both of the following shall apply:</u> (1) The unexposed surface of the fire safety curtain shall not flame, and (2) Smoke shall not penetrate the material during the test period.	NFPA MOS does not permit multiple requirements within a single section.	Add new 20.2.1.14.4 and renumber subsequent sections.

#	Proposed Change	Substantiation/Notes	Notes to Editorial
74	20.2.3.2 The bumper (yield pad) shall be <u>both of the following</u> : <u>(1) a</u> A compressible pad, a minimum of 3 in. (76 mm) in diameter, made with an outer covering of the curtain fabric and filled with fiberglass or other noncombustible materials at a minimum 3 lb/ft ³ (48 kg/m ³) density and shall be <u>(1)(2) e</u> 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.	
75	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.	
76	20.4.1.3.5 The guide shoe shall be <u>both of the following</u> : <u>(1) f</u> Fitted to the above-edge guide system and shall be <u>(1)(2) b</u> 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.	
77	20.4.3.2 The frame shall be <u>both of the following</u> : <u>(1) e</u> Constructed of noncombustible materials and shall have <u>(1)(2) a</u> A minimum thickness of 4 in. (102 mm) <u>thick</u> .	NFPA MOS does not permit multiple requirements within a single section.	
78	20.4.4 Unframed Fire Safety Curtain Assembly. 20.4.4.1 – Guide Systems.	NFPA MOS does not permit single subsections. <u>Either combine headers to delete 20.4.4.1 header.</u>	Delete section 20.4.4.1 and renumber subsequent section accordingly.
79	20.4.5 Brail Fire Safety Curtain Assembly. A brail fire safety curtain assembly shall meet the requirements of Section 20.2, with the following modifications: ... (7) Vertical lift lines shall be <u>both of the following</u> : <u>(a) a</u> A minimum of 1/4 in. (6.4 mm) diameter, 7 × 19 galvanized aircraft cable and shall be <u>(a)(b) s</u> Spaced on a maximum of 18 ft (5.5 m) centers.	NFPA MOS does not permit multiple requirements within a single section.	Break out requirements in 20.4.5(7) into (a) and (b).
80	20.6.3 Lift lines and their supporting components and termination shall be <u>both of the following</u> : <u>(1) r</u> Rated by the manufacturer for the imposed load and shall be <u>(1)(2) i</u> Installed in accordance with the manufacturer's instructions.	NFPA MOS does not permit multiple requirements within a single section.	

#	Proposed Change	Substantiation/Notes	Notes to Editorial
81	20.6.5.3* Vertical guide pockets shall <u>comply with both of the following:</u> (1) eExtend vertically from the stage floor to a point above the top of the open fire safety curtain assembly and shall (1)(2) bBe fastened or welded to the proscenium wall. 20.6.5.4 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 <u>in accordance with 20.6.5.5.</u> 20.6.5.54-1 Steel shapes and plates shall be connected with minimum 3/8 in. (9.5 mm) diameter grade 5 bolts. 20.6.5.56 Vertical guide pockets shall be set back from the vertical edges of the proscenium opening <u>in accordance with 20.6.5.7.</u> 20.6.5.75-1 This <u>The</u> 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.	
82	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.	Add new section 20.6.6.1 and renumber subsequent sections.
83	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 <u>and as required by 20.6.7.4., and r</u> 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 <u>Stay chains</u> shall be sized for the shock loads imposed.	NFPA MOS does not permit multiple requirements within a single section or single subsections.	Add new 20.6.7.4 and 20.6.7.6 and renumber subsequent sections.
84	20.6.8.21-1 Purchase lines shall be a synthetic polyester rope having a minimum tensile strength of 8500 lb (3856 kg).	NFPA MOS does not permit single subsections.	
85	20.6.8.43-1 The top spreader (tie) plate shall be <u>both of the following:</u> (1) aA locking type and shall (1)(2) sSecure to each arbor rod.	NFPA MOS does not permit multiple requirements within a single section or single subsections.	Move this section up one level (number may be affected by change to previous sections)
86	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 <u>The actuation of the emergency stop button</u> shall not prevent or impede emergency closing of the fire safety curtain.	NFPA MOS does not permit multiple requirements within a single section.	Add new 20.6.10 and renumber subsequent section.

#	Proposed Change	Substantiation/Notes	Notes to Editorial
87	20.7.2.2 For a Nonemergency operation, <u>shall comply with one of the following:</u> (1) The controls shall require constant pressure to close the fire safety curtain,. (1) (2) 20.7.2.2.1 As an alternative, t The fire safety curtain shall be 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.	
88	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.	
89	20.8.21.1 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.	Move up one level and renumber subsequent sections.
90	20.8.64.1 Acceptance testing shall be conducted by the installing contractor in accordance with the requirements of Chapter 20.	NFPA MOS does not permit single subsections.	Move up one level and renumber subsequent sections.
91	21.4 Power Operators. Power operators shall be <u>one of the following:</u> (1) p Provided with a standby or emergency power source to close the curtain upon activation or shall be (1)(2) c Capable of closing the curtain without power.	NFPA MOS does not permit multiple requirements within a single section.	
92	21.10.1 Repairs shall be made, and defects that could interfere with operation shall be corrected without delay.	NFPA MOS does not permit multiple requirements within a single section.	



Committee Input No. 59-NFPA 80-2019 [Global Input]

ITEM 1: Add lanauage to chapters 6-18 which provides guidance on the application of the chapter and reference back to chapters 4 & 5, similiar to what is shown below:

X.1 General.

X.1.1 The installation of new [opening protective type] shall comply with this Chapter and Chapter 4.

X.1.2 The inspection, testing, and maintenance of new and existing [opening protective type] shall comply with this Chapter and Chapter 5.

ITEM 2: Review opeing protection chapters 6-18 for locations which should reference or are reundant with Chapters 4 & 5.

Submitter Information Verification

Committee:

Submittal Date: Wed Nov 20 09:04:44 EST 2019

Committee Statement

Committee Statement: The application of the general chapters (4 & 5) to specific opening protectives is not clear. This change will provide a section at the beginning of each opening protective chapter (6-18) which will clearly outline applicable requirements. Additionally, a task group has been formed to review each individual opening protective chapter (6-18) to see if there are specific requirements which should provide reference back to the general chapters, are redundant with the general chapters, or should be exempt from a requirement in the general chapters. This change is roughly based on the formatting of NFPA 101 and is intended to make the document easier to navigate.

Response Message: CI-59-NFPA 80-2019



Committee Input No. 63-NFPA 80-2019 [Global Input]

Rewrite and reorganize chapter 4. Attached Word doc outlines proposed changes to Chapter 4. Due to the extensive changes, a task group has been formed to review the propose changes to determine if they should be included as second draft.

Supplemental Information

File Name	Description Approved
80_CI-63_Chapter_4_.docx	
80_Chapter_4_Figure4.7.3.1b.pdf	

Submitter Information Verification

Committee:

Submittal Date: Wed Nov 20 09:42:20 EST 2019

Committee Statement

Committee Statement: Chapter 4 is a general Chapter but does not currently address the applicability of the chapter or the requirements within the chapter. A new application section has been added to clarify the application of Chapter 4. Some requirements in chapter 4 are not applicable to all opening protectives, these requirements have been updated to clarify to which opening protectives the requirements are applicable. Multiple sections have been moved to sections more relevant to the requirements. Multiple sections were found to be redundant with other sections within Chapter 4 or applicable opening protective chapters and were therefore deleted. Additional changes were made as necessary to clarify existing requirements and make them more enforceable.

A task group has been formed to review the proposed changes within Chapter 4, and to determine if additional changes will be necessary.

Response Message: CI-63-NFPA 80-2019

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Chapter 4 General Requirements

4.1 General Limitations.

4.1.1 Application.

4.1.1.1 This chapter shall cover the installation of opening protectives types complying with Chapters 6 through 18.

4.1.1.2 The requirements of this chapter shall apply to new installations.

4.1.1.3 The requirements of this chapter shall apply to new work or modifications of existing installations.

4.1.1 Classification.

Fire doors and fire windows shall be classified by designating a required fire protection rating expressed in hours or fractions thereof. (See *Annex D*.)

~~4.1.2* Fusible Links.~~

~~4.1.2.1~~

~~The particular fusible link used shall depend on the temperature and load requirements of the application.~~

~~4.1.2.2~~

~~Multiple links shall be permitted to be used to meet the load rating requirements where the load rating of a single link is exceeded.~~

~~4.1.3 Appurtenances.~~

4.1.4 Signage.

[NEW] 4.1.4.1 This section shall apply to fire doors required to comply with chapter 6 through 16.

4.1.4.1 Informational signs shall be permitted to be installed on the surfaces of fire doors in accordance with 4.1.4.1 through 4.1.4.4 or in accordance with the manufacturer's published listing.

4.1.4.1

The total area of all attached signs shall not exceed 5 percent of the area of the face of the fire door to which they are attached.

4.1.4.2 Means of Attachment.

4.1.4.2.1

Signs shall be attached to fire doors by use of an adhesive.

4.1.4.2.2

Mechanical attachments such as screws or nails shall not be permitted.

4.1.4.3*

Signs shall not be installed on fire protection-rated glazing in fire doors.

4.1.4.4

Signs shall not be installed on the surface of fire doors so as to impair or otherwise interfere with the proper operation of the fire door.

4.1.5 Sliding Doors.

~~4.1.5.1~~

Sliding doors shall be permitted to have integral swinging doors.

Commented [SJ1]: Relocate to 4.7.4.1 & 4.7.4.2

Commented [SJ2]: Relocated to Chapter 5 per FR-55.

Commented [SJ3]: See FR-54 for changes to this section

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~~4.1.5.2—~~

~~Where sliding doors include an integral swinging door, they shall be permitted to be used on exits to the exterior of the building.~~

4.2 Listed and Labeled Products.

(See 3.2.3 and 3.2.4 for definitions.)

4.2.1*

Listed items shall be identified by a label.

4.2.1.1

At a minimum, the label for fire doors shall contain the following information:

- (1) The words “fire door.”
- (2) The manufacturer’s 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 door.
- (5) A unique serial number, if provided by the listing agency.
- (6) The fire test standard designation to which the assembly was tested.
- (7) *The temperature transmission rise at 30 minutes. If the temperature transmission rise of a fire door exceeds 650°F (361°C), the temperature rise shall be permitted to be omitted.

4.2.1.2

For ~~swinging~~ doors ~~provided with builders hardware complying with chapter 6~~, the minimum latch throw shall also be shown. (See 4.3.3.)

4.2.1.3

Where applicable, a statement that no hose stream test was conducted shall be provided.

4.2.1.4

The label for fire door frames shall contain the following information, unless otherwise permitted by 4.2.1.4.2:

- (1) The words “fire door 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 of the frame
- (5) The fire test standard designation to which it was tested

4.2.1.4.1

Fire door frames rated at 3 hours when installed with masonry anchors in masonry walls or rated at 1 ~~12~~ hours when provided with wood stud or steel stud anchors and installed in gypsum board walls shall not be required to be provided with a fire protection rating.

4.2.1.4.2

~~In lieu of 4.2.1.4.1, f~~ire door frames shall be permitted to be marked with the label or embossment of the third-party certification agency and the manufacturer’s name or a code that can be traced back to the manufacturer.

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4.2.1.4.3

Where applicable, a statement that no hose stream test was conducted shall be provided.

4.2.1.5

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

4.2.1.6

The label for oversized doors shall contain the following information:

- (1) The words "oversized fire door"
- (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 basis of a fire protection rating

4.2.2*

New fire protection-rated and fire resistance-rated glazing shall be marked in accordance with Table 4.2.2, and such marking shall be permanently affixed.

Table 4.2.2 Marking Fire-Rated Glazing Assemblies

Fire Test Standard	Marking	Definition of Marking
ASTM E119 or ANSI/UL 263	W	Meets wall assembly criteria
NFPA 257	OH	Meets fire window assembly criteria, including the hose stream test
NFPA 252	D	Meets fire door assembly criteria
	H	Meets fire door assembly hose stream test
	T	Meets 450°F (232°C) temperature rise criteria for 30 minutes
	XXX	The time, in minutes, of fire resistance or fire protection rating of the glazing assembly

[101:Table 8.3.3.6.3]

4.2.3

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

4.2.3.1

Labels shall be permitted to be installed on the top of doors.

4.2.3.2

Labels shall be permitted to be installed underneath removable caps or covers.

Commented [SJ4]: See CI-13

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4.2.4

~~Where a swinging fire door assembly is installed in a location not requiring a rated opening protective, the label shall be permitted to be removed and the provisions of Chapter 5 shall not apply.~~

Commented [SJ5]: Section deleted by FR-35

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.

4.2.6*

Specification of items of a generic nature, ~~such as hinges,~~ that are not labeled shall comply with the specifications contained in this standard.

[Add new annex section]

A.4.2.6 Items of a generic nature can include hinges, protection plates, etc.

4.2.7 Components.

4.2.7.1

A fire door assembly shall consist of components that are separate products incorporated into the assembly and are allowed to have their own subcomponents.

4.2.7.2*

Except where restricted by individual published listings, a fire door assembly shall be permitted to consist of the labeled, listed, or classified components of different organizations that are acceptable to the AHJ.

4.3 Classifications and Types of Doors.

4.3.1*

Only labeled fire doors shall be used.

4.3.2

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

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

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*

~~Rolling steel fire doors~~Rolling doors comply with chapters 11 through 13 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.

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4.3.7

Access-type door assemblies shall consist of single swinging steel doors with frames, self-latching devices, and closing mechanisms.

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 shall include curtain, bottom bar, wall-guides, frame, sill, latching, and counterbalancing mechanism.

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 shall be provided with a certificate of inspection furnished by an approved testing agency.

4.3.9.2

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.

4.3.9.3

Oversize doors shall comply with the requirements of Chapters 6 through 16 for the type of door.

4.4 Glazing ~~Material in Fire Doors~~.

[NEW] 4.4.1

Glazing in fire doors shall comply with 4.4 where required by Chapters 6 through 16.

4.4.1*

Only labeled fire resistance-rated or fire protection-rated glazing material shall be used in fire door assemblies when permitted by the door listing. (See A.3.3.56, *Fire Protection Glazing*.)

4.4.2

Fire protection glazing and fire resistance glazing shall meet all applicable impact safety standards.

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.

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.

4.4.4*

Fire protection glazing not exceeding 100 in.² (0.065 m²) shall be permitted in fire doors having a 3-hour fire protection rating or in fire doors having a 1½-hour fire protection rating for use in severe exterior fire exposure locations where the fire protection glazing has been tested for the desired rating period with no through-openings 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*.

Commented [SJ6]: Re-associate annex for 4.4.4 to 4.4.7.

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 shall be limited in size and area in accordance with Table 4.4.5.~~

[NEW] 4.4.6

Maximum area of glazing shall be limited to the maximum area tested, unless otherwise required by 4.4.7.

[NEW] 4.4.7*

Maximum area of glazing shall not exceed 100 in.² (0.065m²) for the following types of doors:

- (1) Three-hour fire-rated doors
- (2) Temperature rise-rated doors
- (3) 1-1/2 hour fire-rated sever exterior exposure location with no through-openings

Table 4.4.5 Fire Door Rating

Fire Door Rating (hr)	Maximum Area of Glazing (per Door Leaf^a)
1/2, 1/3	Limited to maximum area tested
3/4	Limited to maximum area tested ^b
1 ^c , 1-1/2 ^{a,c}	Limited to maximum area tested
3 ^a	100 in. ² (0.065 m ²)

^aSee also requirements in 4.4.4.

^bSee 4.4.5.1.

^cFire protection-rated glazing materials exceeding 100 in.² (0.065 m²) in area are not permitted in temperature rise-rated doors.

4.4.85.1

Maximum area of individual exposed lights shall be 1296 in.² (0.84 m²) with no dimension exceeding 54 in. (1.37 m) unless otherwise tested.

4.4.6

Each individual glazing unit shall be identified with a label that is visible after installation, unless otherwise permitted by the manufacturer's listing.

4.4.7

Viewers in ~~fire~~ doors shall be labeled.

4.4.85 Fire Resistance-Rated Glazing in Doors and Windows.

Fire resistance-rated glazing shall be permitted in fire doors or windows having a fire protection rating of 3 hours or less where the glazing complies with all of the following:

- (1) that it limits the temperature rise on the unexposed surface and withstands the impact of the hose stream test as required for walls for the required duration in accordance with 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 is subsequently

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~~(2) 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; or NFPA 257 or ANSI/UL 9 Standard for Fire Tests of Window Assemblies, shall be permitted in fire doors or windows having a fire protection rating of 3 hours or less and shall be~~
~~(1)(3) limited to the maximum area tested. (See 6.3.3.3, 6.3.3.4, and Annex D.)~~

4.6 Classification of Hardware for Fire Doors.

4.6.1

Hardware required for the installation of all types of fire doors shall be as specified in those sections covering installation.

4.6.2

Hardware for fire doors shall be referred to classified as builders hardware or fire door hardware comply with one of the following:

- (1) *Hardware on doors complying with Chapter 6 shall be classified as builders hardware.
- (2) Hardware on doors complying with Chapter 7 through 16 shall be classified as fire door hardware.

[NEW] A.4.6.2(1)

Fire exit hardware is within the classification of builders hardware. Builders hardware can also include hinges (full mortise, half mortise, half surface, full surface, olive knuckle, paumelle, or spring), single-, two-, or three-point locks and latches, top and bottom bolts (flush, surface, or concealed), and door closers.

~~4.6.2.1~~

~~Fire exit hardware shall be within the category of builders hardware.~~

~~4.6.3~~

~~In this standard, builders hardware shall be applied only to swinging doors.~~

~~4.6.3.1*~~

~~Builders hardware shall include hinges (full mortise, half mortise, half surface, full surface, olive knuckle, paumelle, or spring), single-, two-, or three-point locks and latches, top and bottom bolts (flush, surface, or concealed), and door closers.~~

~~4.6.3.2~~

~~Builders hardware shall not be required to be shipped from the factory with the fire doors.~~

~~4.6.3.3*~~

~~Fire exit hardware shall consist of exit devices that have been labeled for both fire and panic protection.~~

~~4.6.4*~~

~~Fire door hardware shall be applied to both swinging and sliding doors.~~

~~4.6.4.1~~

~~Fire door hardware that is applied to swinging doors shall consist of surface-mounted strap hinges, surface-applied latches, and closing devices.~~

~~4.6.4.2~~

~~In this standard, all hardware for sliding doors shall be fire door hardware.~~

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4.6.4.3–

~~Fire door hardware shall be shipped from the factory with the fire door.~~

4.7 Actuation Devices ~~for Fire Doors, Fire Shutters, and Fire Windows.~~

4.7.1 General.

[NEW] 4.7.1.1

This section shall be applicable to opening protectives complying with chapters 6 through 17.

4.7.1.1

Actuation devices ~~for the release of fire doors~~ shall be permitted to be part of an overall system ~~that releases the door, such as a fire alarm, water flow alarm, or carbon dioxide release system.~~

Commented [SJ7]: This text deleted by FR-14

4.7.1.2

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

[NEW] 4.7.1.3

Opening protectives shall not be required to be provided with more than one means of actuation, unless by required this standard or other codes or standards.

4.7.1.3

When the system or arrangement of detectors for an opening is not considered to be fail-safe, fusible links shall be used to ensure automatic closing ~~of the door~~ in the event of a power failure.

4.7.1.4

~~Fire doors~~ Opening protectives that incorporate a device that delays activation of an automatic-closing, self-closing, or emergency power operation shall not delay the initiation of the closing or reclosing of the ~~door~~ opening protective for more than 10 seconds, unless acceptable to the authority having jurisdiction.

4.7.1.5*

When actuation devices are used in conjunction with material handling systems, such as a conveyor, they shall be arranged in accordance with the following:

- (1) They shall stop the feed conveyor or otherwise initiate the mechanism that clears the path of the fire door.
- (2) They shall provide an adequate time delay to clear the opening that shall not exceed 10 seconds.
- (3) They shall activate the automatic- or self-closing mechanism.

4.7.2 Smoke Detectors.

Where smoke detectors are used, they shall be located in accordance with *NFPA 72*.

4.7.3 Heat Detectors.

4.7.3.1

Where provided, All 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 shall detectors be placed in the dead air space shown in Figure 4.7.3.1(a).

Figure 4.7.3.1(a) Proper Placement of Heat Detectors and Fusible Links.

Commented [SJ8]: See attachment for new Figure.

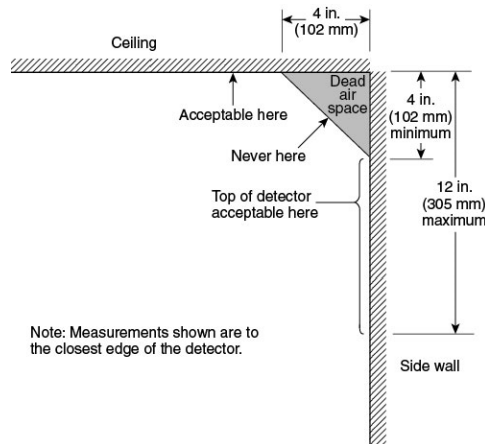
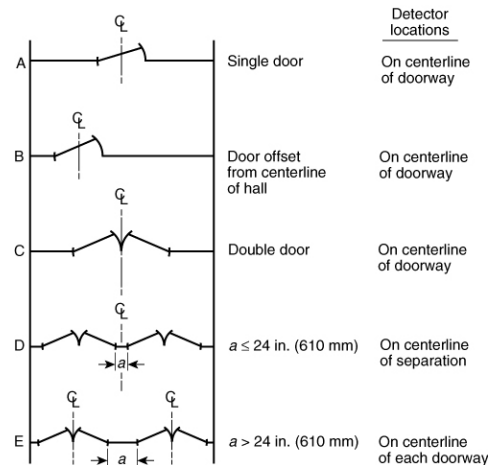


Figure 4.7.3.1(b) Heat Detector Locations.



[NEW] 4.7.3.2

Where a drop ceiling is provided with an interstitial space greater than XX ft., heat detectors shall be provided both under the ceiling and at the floor or roof deck.

4.7.3.2

Unless otherwise acceptable to the AHJ, heat detectors shall be installed on both sides of the wall and interconnected so that the operation of any single heat detector causes the door-opening protective to close.

4.7.4 Fusible Links.

4.1.2.1 4.7.4.1

The particular fusible link used shall depend on the temperature and load requirements of the application.

Commented [SJ9]: Task group to determine what would be a reasonable distance.

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4.1.2.2-4.7.4.2

Multiple links shall be permitted to be used to meet the load rating requirements where the load rating of a single link is exceeded.

Commented [SJ10]: Existing text relocated from 4.1.2.1 & 4.1.2.2

4.7.4.1*

Except as required by 4.7.4.2 and 4.7.4.3, fusible links shall be placed as shown in Figure 4.7.3.1(a).

4.7.4.2*

Unless otherwise acceptable to the AHJ, fusible links shall be installed on both sides of the wall and interconnected so that the operation of any single fusible link causes the ~~door-opening protective~~ to close.

4.7.4.3*

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.

[NEW] 4.7.4.3.1

Where there are multiple ceilings, fusible links shall be provided under each ceiling having an interstitial space greater than XX ft.

Commented [SJ11]: Task group to determine what would be a reasonable distance.

[NEW] 4.7.4.3.2

Smoke detectors shall be permitted to be installed in lieu of fusible links, where permitted by the AHJ.

[NEW] A.4.7.4.3.2

There can be locations where it is difficult to run cable for fusible links. This will allow for the use of smoke detection where it is impractical to install a fusible link.

4.7.4.3.1

Where fusible links are installed on both sides of the wall, 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

The sleeve shall be 12 in. (13 mm) diameter galvanized steel conduit or pipe, with ends deburred, and fitted with a collar or bushing at each end to secure the sleeve around the wall and allow free movement of the cable or chain through the sleeve upon fusing of the links.

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.

4.8 Supporting Construction. This section shall apply to opening protectives comply with chapters 6 through 17.

4.8.1 Walls.

4.8.1.1

Walls shall be plumb and true, present smooth surfaces, and have a fire resistance rating as required by the AHJ.

4.8.1.2

Walls shall be of brick, concrete, or concrete masonry unit construction except that, 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.

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4.8.1.3

~~Fire Door assemblies~~Opening protectives shall be used on walls of other construction only where listed for such installation.

4.8.1.4*

Where hollow concrete masonry units are used and where tin-clad and sheet metal (corrugated) doors are mounted, the wall openings shall be reinforced to provide anchorage for door-mounting hardware equal to that of brick or concrete.

4.8.1.5*

For tin-clad and sheet metal (corrugated) doors, continuous steel load-bearing plates (crush plates) of 3/16 in. × 3 in. (4.76 mm × 76.2 mm) minimum dimensions shall be permitted to be used to bridge the cavities and to prevent the through-wall bolts from crushing the hollow blocks.

~~4.8.1.6~~

~~Fire Door assemblies shall be used on walls of other construction only if listed for such installation.~~

4.8.2 Sills.

4.8.2.12

In buildings with combustible floor constructions or combustible floor coverings, a sill shall be required if the combustible floor construction structure is extended through the door opening, as combustible floor construction shall not be permitted to extend through the door opening.

4.8.2.1

In buildings with noncombustible floors, a sill shall not be required, provided the noncombustible floor structure is extended through the door opening.

~~4.8.2.2~~

~~In buildings with combustible floors or combustible floor coverings, a sill shall be required if the floor structure is extended through the door opening, as combustible floor construction shall not be permitted to extend through the door opening.~~

4.8.2.3

Door openings required to be protected by 1/2-hour or 1/3-hour rated fire protection door assemblies shall be exempted from the requirements of 4.8.2.2.

4.8.2.4

Sills shall be constructed of noncombustible materials.

4.8.2.5*

For swinging doors with builders hardware and special-purpose horizontally sliding accordion or folding doors with frames having a jamb depth of 4 in. (102 mm) or less, the sill width shall be equal to the jamb depth.

4.8.2.6*

Where frames have a greater jamb depth, 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.

4.8.2.7

For swinging doors with fire door hardware, sills shall extend at least the depth of the door frame for flush-mounted doors.

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4.8.2.8*

For lap-mounted doors, sills shall extend beyond the opening for a length equal to the projection of the installed door or doors.

4.8.2.9*

For horizontally sliding fire doors and vertically sliding fire doors, sills shall be constructed of noncombustible material and shall extend 6 in. (152 mm) past the edge of the opening on each side and 4 in. (102 mm) out from the face of the wall.

4.8.2.10 Rolling Steel Fire Doors.

For rolling steel fire doors, sills shall be constructed of noncombustible material, shall extend past each jamb as necessary to be completely under the guides, and 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.

4.8.2.11

For service counter fire doors, sills shall be provided as part of the fire door assembly.

4.8.2.12

Flush concrete sills shall extend to the wall opening on both sides.

4.8.2.13*

For swinging doors with builders hardware, horizontally sliding doors, and special-purpose horizontally sliding accordion or folding doors, raised noncombustible sills or thresholds shall be permitted wherever combustible floor coverings are contemplated or are in use on one or both sides of the door openings.

4.8.3 Lintels.

4.8.3.1

Lintels shall be brick, concrete or masonry arches, steel, or reinforced concrete.

4.8.3.2

Lintels of other types of construction shall be allowed when acceptable to the AHJ.

4.8.4 Clearance.

4.8.4.1*

Clearance under the bottom of a door shall ~~comply with table 4.8.4.1, be a maximum of 3/4 in. (19 mm).~~

Table 4.8.4.1 Maximum Clearance Under Bottom of Doors

<u>Door Type</u>	<u>Clearance</u> <u>in. (mm)</u>
<u>Swinging Doors with Builders Hardware*</u>	<u>3/4 (19)</u>
<u>Swinging Doors with Fire Door Hardware</u>	<u>3/4 (19)</u>
<u>Horizontally Sliding Doors</u>	<u>NP</u>
<u>Special-Purpose Horizontally Sliding Accordion or Folding Doors</u>	<u>NP</u>
<u>Vertically Sliding Fire Doors</u>	<u>NP</u>
<u>Rolling Steel Doors</u>	<u>NP</u>
<u>Fire Shutters</u>	<u>NP</u>
<u>Service Counter Fire Doors</u>	<u>NP</u>
<u>Hoistway Doors for Elevators and Dumbwaiters</u>	<u>3/4 (19)</u>
<u>Chute Doors</u>	<u>NP</u>

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<u>Access Doors</u>	NP
NP: Not permitted	
*Where the bottom of the door is more than 38 in. above the finished floor, the maximum clearance shall not exceed 3/8 in.	

4.8.4.2*

Clearance under the bottom of the door shall be measured vertically from the bottom of the door to the top of the finished floor ~~or threshold~~.

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 permitted clearances in Table 4.8.4.1, 3/4 in. (19 mm).

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.

4.8.4.3*

Products evaluated for fire doors with a bottom clearance in excess of **3/4 in. (19 mm)** and listed for use at or under the bottom of the fire door shall be permitted where installed in accordance with their listings.

~~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.~~

4.8.5 Floor Coverings.

4.8.5.1

Combustible floor coverings shall be permitted to extend through openings required to be protected by 1 ~~1/2~~-hour, 1-hour, or ~~3/4~~-hour rated fire protection fire door assemblies without a sill where they have a minimum critical radiant flux of 0.22 W/cm² in accordance with NFPA 253 or with ASTM E648, *Standard Test Method for Critical Radiant Flux of Floor-Covering Systems Using a Radiant Heat Energy Source*.

4.8.5.2

Combustible floor coverings shall not extend through openings protected by 3-hour rated fire protection door assemblies.

4.8.5.3

The use of a noncombustible or listed threshold shall be permitted to interrupt the combustible floor covering.

4.8.6* Wall Anchors.

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:

- (1) Expansion anchors shall be manufactured from steel and shall be zinc-coated or cadmium-coated.

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- (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)*.
- (3) The compressive strength of the concrete shall not be less than 2000 psi (13,790 kPa), and the bolt load shall not exceed $\frac{1}{4}$ of the proof test load.
- (4) Where used in brick or filled concrete masonry unit walls, the bolt load shall not exceed $\frac{1}{12}$ of the proof test load.
- (5) 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. The distance between expansion anchors shall be at least eight times the diameter of the anchor.

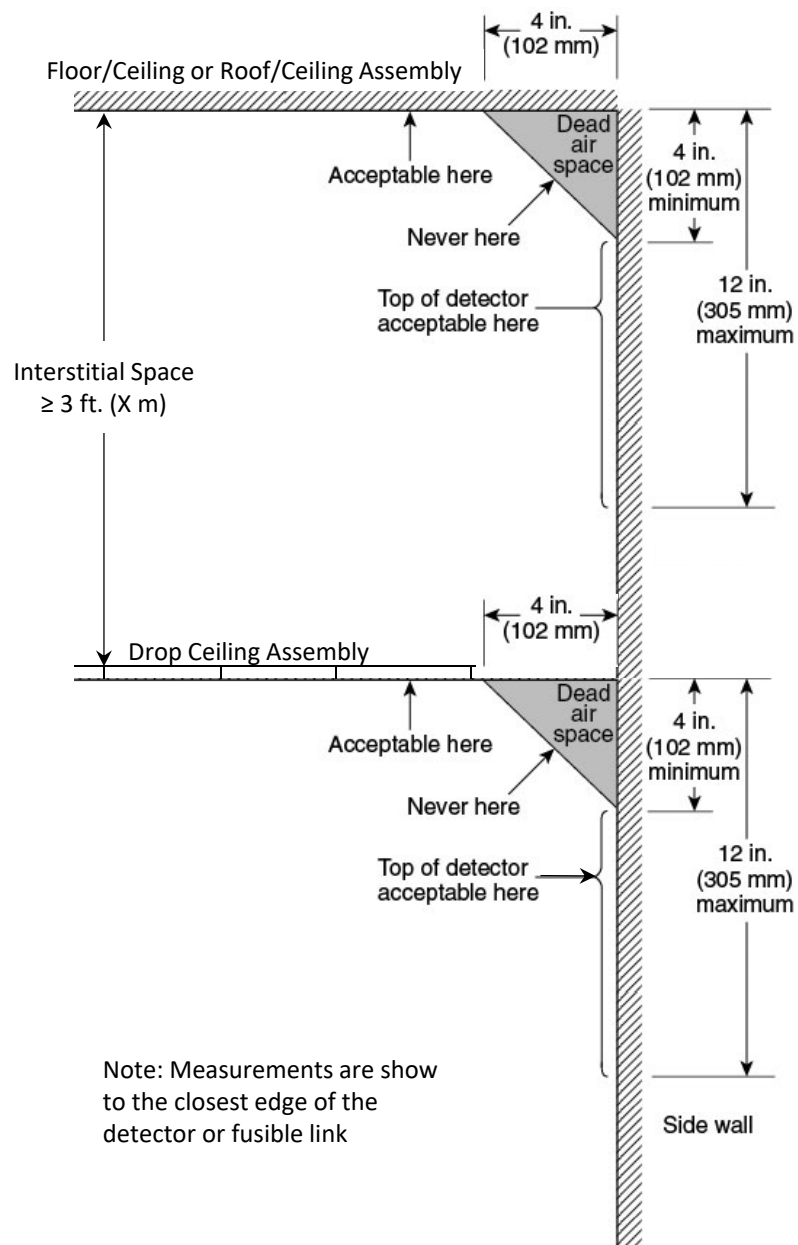


Figure 4.7.3.1(b) Proper Placement of Heat Detectors and Fusible Links where Multiple Ceilings are Provided

**Committee Input No. 13-NFPA 80-2019 [Section No. 4.2.2]****4.2.2***

New fire protection-rated and fire resistance-rated glazing shall be marked in accordance with Table 4.2.2, and such marking shall be permanently affixed.

Table 4.2.2 Marking Fire-Rated Glazing Assemblies

Fire Test Standard	Marking	Definition of Marking
ASTM E119 or ANSI/UL 263	W	Meets wall assembly criteria
NFPA 257	OH	Meets fire window assembly criteria, including the hose stream test
NFPA 252	D	Meets fire door assembly criteria
	H	Meets fire door assembly hose stream test
	T	Meets 450°F (232°C) temperature rise criteria for 30 minutes
	XXX	The time, in minutes, of fire resistance or fire protection rating of the glazing assembly

[101:Table 8.3.3.6.3]

Submitter Information Verification

Committee: FDW-AAA

Submittal Date: Wed Nov 13 15:27:25 EST 2019

Committee Statement

Committee Statement: A request has been put into the NFPA 101 correlating committee to correlate 101, Table 8.3.3.6.3 with NFPA 5000, Table 8.7.7.2. If the appropriate changes are not made in NFPA 101, this technical committee will update the extracted table to be extracted from NFPA 5000, Table 8.7.7.2.

Response Message: CI-13-NFPA 80-2019



Committee Input No. 17-NFPA 80-2019 [Section No. 6.4.5]

6.4.5—*_ Protection Plates.

[NEW] A. 6.4.5

Committee to draft language for a new annex note .

6.4.5.1

Factory-installed protection plates shall be labeled and installed in accordance with the 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.

Submitter Information Verification

Committee: FDW-AAA

Submittal Date: Wed Nov 13 17:54:57 EST 2019

Committee Statement

Committee Statement: The committee will look at drafting language for a new annex section to 6.4.5. This section is commonly misapplied and clarification should be provided to outline the proper application of this section.

Response Message: CI-17-NFPA 80-2019

**Committee Input No. 29-NFPA 80-2019 [Section No. 19.5.2.3.3]****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.

Submitter Information Verification

Committee: FDW-AAA

Submittal Date: Thu Nov 14 16:05:06 EST 2019

Committee Statement

Committee Statement: A task group is in the process of gathering real world data on damper failure rates and causes of failures to determine if revisions are required to the remote test method. The task group plans to review the data, from dampers eligible to utilize the remote test method, to determine the frequency of actual failures that could result in false positive remote tests. A false positive test is defined as an identified failure that could result in a damper successfully completing the remote test sequence when in fact the damper is not operating as designed. The task group needs additional time to determine if this data currently exists.

If after reviewing this data it is deemed that there are valid concerns of false positive remote tests the task group will investigate adding a requirement to the remote test method for visual inspections to be conducted on a time frame exceeding 4 years (or 6 years for hospitals). An alternate modification that would be considered is to require a certain percentage of dampers utilizing the remote test method to be inspected visually during each damper inspection cycle. If one of the dampers that was visually inspected showed a false positive remote test it could trigger a larger scale visual inspection of remotely tested dampers.

Response Message: CI-29-NFPA 80-2019