AGENDA

NFPA Technical Committee on Fire Doors and Windows (FDW-AAA)
NFPA 80 and NFPA 105 First Draft Meeting (A2027)

November 10-12, 2025
8:00 a.m. (MT)

Embassy Suites by Hilton Denver Downtown Convention Center
Denver, CO
To join the meeting, please contact jyee@nfpa.org

1. **Call to order.** James Peterkin.
2. **Introductions.** See committee roster attached.
3. **Chair report.** James Peterkin.
4. **Staff liaison report.** Jennifer Sisco.
5. **Previous meeting minutes.** August 2025 Web/Teleconference. See attached.
6. **Fire Protection Research Foundation.** Door signage project update.
7. **NFPA 105 First Draft.**
   a. **Public Inputs.** See attached.
   b. **Task group report(s).**
      i. **Remote Damper Inspection Task Group**. Keith Pardoe. See attached.
      ii. **Reclaimed Materials.** Michael Nicasio. See attached.
      iii. **80/105 Consistency.** Keith Lippincott.
   c. **Presentation(s).**
8. **NFPA 80 First Draft.**
   a. **Public Inputs.** See attached.
   b. **Task group report(s).**
      i. **Field Labeling Pro. Qual.** S. Orlowski.
      ii. **Remote Damper Inspection Task Group**. Keith Pardoe. See attached.
      iii. **Door Signage and Wraps.** Mark Chrisman.
      iv. **Integrated Doors.** Hal Kelton.

v. **Alternate Materials.** Justin Hendricks. See attached.

vi. **Rolling Steel Doors Fusible Links.** Jerry Rice. See attached.

vii. **Reclaimed Materials.** Michael Nicasio. See attached.

viii. **80/105 Consistency.** Keith Lippincott.

c. **Presentation(s).**

9. Other Business.

10. Future meetings.

11. Adjournment.

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MINUTES

NFPA Technical Committee on Fire Doors and Windows (FDW-AAA)
NFPA 80 and 105 Pre-First Draft Meeting (A2027)

August 21, 2025
10 a.m. – 12 p.m. (ET)

Web/Teleconference

1. **Call to order.** James Peterkin, chair, called the meeting to order at 10 a.m. (ET) on August 21, 2025.
2. **Introductions.** Attendees introduced themselves and identified their affiliation.
3. **Chair report.** James Peterkin welcomed attendees and provided an overview of the meeting.
4. **Staff liaison report.** Jennifer Sisco provided an overview of the standards development process and the revision cycle schedule.
   a. The following members declared that they had been retained to represent the interest of an entity that would be classified in an interest category different from their own with respect to a specific issue or issues that were addressed by the committee. These members refrained from voting on the Public Input, Public Comment or other matters, as noted.

      William Koffel will be representing AMCA on all issues related to dampers.
5. **Previous meeting minutes.** The minutes from August 2024 Web/Teleconference were approved without revision.
6. **Task Group Reports.** The following task groups provided their reports and recommendations.
   a. **Task Group on Trained Rolling Steel Fire Door Systems Technician TIA**. B. Campbell. The task group had completed their work upon submission of the related TIA. The task group has been discharged with thanks.
   b. **Field Labeling Pro. Qual.** S. Orlowski. The task group did not provide a report. The task group has been reconstituted to continue work.
7. **Passed Certified Amending Motions.**
   a. **Periodic Visual Damper Inspection.** The technical committee reviewed CAM related to period visual damper inspection and formed a task group. See “New task groups”.
   b. **Inaccessible Dampers.** The technical committee reviewed CAM related to inaccessible dampers.

8. **NFPA 80.** The following topics were brought up and discussed.
    a. **Door wraps and signage.** There were multiple public inputs received related to door wrap and signage. A task group was formed to review the public inputs prior to the first draft meeting. See "New task groups".
    b. **Integrated swinging doors.** A gap in requirements was identified for integrated swinging door solutions. A task group has been formed to draft new requirements. See "New task groups."
    c. **Aluminum and alternate door materials.** A gap in requirements was identified for doors and frames constructed to alternate materials, including aluminum. A task group has been formed to draft new requirements. See "New task groups."
    d. **Fusible links for rolling steel doors.** It was identified that the NFPA is not clear on several issues related to fusible links including installations where a single fusible link actuates multiple doors, required locations of fusible links for exterior rolling steel doors, and required locations for fusible links were there are multiple ceilings. A task group has been formed to draft new requirements. See "New task groups."
    e. **Reclaimed materials.** It was identified that NFPA 80 and NFPA 105 do not address the use of reclaimed materials. A task group has been formed to draft new requirements. See "New task groups."
9. **NFPA 105.**
    a. **Consistency between NFPA 80 and NFPA 105.** It was identified that there are inconsistencies between the language, structure, and requirements in NFPA 80 and NFPA 105. A task group has been formed to review the two documents and draft proposals. See "New task groups."
10. **New task groups.** The following task groups were appointed to work subsequent to the meeting (*denotes non-committee members):
    i. **Remote Damper Inspection Task Group**. TG Chair: Keith Pardoe. Members: Joe Pickens, Michael Nicasio, Phil Montouri*, Marty Gissel, Chad Beebe, Keith Lippincott, Bruce Campbell, Alex Talwar, Joe Glaski, Jerry Gorrell, Robert Kuks, Michael Savage, Bill Koffel. Review the related second revisions [A2025-80-SR-33, A2025-105-SR-8], certified amending motions [CAM 80-2/6, CAM 105-2/5], and Standards Council decisions [D#24-2, D#24-3] from the previous cycle and related public input [80-PI-45, 105-PI-42, 105-PI-43] from this cycle related to the visual inspection of dampers utilizing the remote inspection method. Draft responses to the public inputs and proposed language for NFPA 80 and NFPA 105 as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.
    ii. **Door Signage and Wraps.** TG Chair: Mark Chrisman. Members: Keith Pardoe, Hal Kelton, Jayson Karas, Mark Smith, Rob Sontag, Cesar Lujan, Gordon Howie, Jason Friedrich*, Keith Lippincott, Justin Hendricks, Chris Banda. Review all Public Inputs in NFPA 80 [PI-21, 20, 63, 73] related to door signage and door wraps, including elevator doors. Draft responses to the public inputs and proposed language as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.

iii. **Integrated Doors.** TG Chair: Hal Kelton. Members: Jerry Rice, Jayson Karas, Kurt Roeper, Karen Bishop, Keith Pardoe, Tim Weller, Marilyn Latham-Morgan, Matthew Phillips*. Evaluated the applicability of the requirements in NFPA 80 to integrated swinging doors. Draft proposed language as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.

iv. **Alternative Materials.** TG Chair: Justin Hendricks. Members: Jerry Rice, Jayson Karas, Kurt Roeper, Karen Bishop, Keith Pardoe, Tim Weller, Hal Kelton, Keith Pardoe, Jayson Karas, Michael Nicasio, Jerry Rice, Brandon McCormick, Marilyn Latham-Morgan, Cesar Lujan, Jason Friedrich*, Matthew Phillips*. Evaluate the applicability of the requirements for swinging doors in Chapter 6 in NFPA 80 to alternative building materials, including aluminum and composites. Draft proposed language as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.

v. **Rolling Steel Doors Fusible Links.** TG Chair: Jerry Rice. Members: David Mount, Curt Schroeder, Joe Anderson, Michael Nicasio, Dave Dawdy. Consider if requirements are required to be added to NFPA 80 to address installations where a single fusible link actuates multiple rolling steel fire doors, the location of fusible links for rolling steel fire doors installed in exterior walls, and installations where there are multiple ceilings or large interstitial spaces above a door. Draft proposed language as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.

vi. **Reclaimed Materials.** TG Chair: Michael Nicasio. Members: Karen Bishop, Kurt Roeper, Hal Kelton, David Mount, Joe Anderson, Marilyn Latham-Morgan, Tim Weller, Curt Schroeder, Matthew Phillips, Dave Dawdy. Review Public Inputs [80-PI-55, 105-PI-51] related to use of reclaimed materials in NFPA 80 and NFPA 105. Draft response to public inputs and requirements related to permissible or prohibited use of reclaimed materials in NFPA 80 and NFPA 105 as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.

vii. **80/105 Consistency.** TG Chair: Keith Lippincott. Members: Keith Pardoe, Joe Glaski, Hal Kelton, Dennis Dawe, Jack Howard, Shay Rankhorn, Robert Kuks, Dave Mount, Jeremy Zeedyk. Review the requirements within NFPA 80 and NFPA 105 for consistency and draft revised requirements as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.

11. Future meetings. The next committee meeting will be November 10 – 12, 2025. A meeting notification will be posted at www.nfpa.org/80next and www.nfpa.org/105next when the meeting is scheduled.

12. Adjournment. The meeting was adjourned at 12 p.m. (ET) on August 21, 2025.

Attendees

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✓	Talwar, Alex	Alternate	Greenheck
✓	Tlemsani, Mahdi	Alternate	Exponent
✓	Tomecek, David	Alternate	Jensen Hughes
	Walkowiak, Tim	Alternate	Guardian Fire Testing Labratories
✓	Weller, Timothy	Alternate	Allegion Rep. Steel Door Institute
✓	Zaremba, Thomas	Alternate	Roetzel and Andress Rep. Glazing Industry Code Committee
✓	Sisco, Jen	Staff Liaison	National Fire Protection Association

Guests:

Jason Friedrich	QAI
Todd Braxton	DH Pace Compliance Services
Eric Powell	National Elevator Industry Inc. (NEII)
Casey Lange	*Indiana/Kentucky/Ohio Regional Council of Carpenters Joint Apprenticeship and Training Fund*
Joe Hayden	Kellen Company
Matthew Phillips	Allegion
Joe Anderson	*Vortex Doors*
Phil Montouri	NEMI
Steve Schreiber	WDMA
Jeremy Zeedyk	Western States Council/JCEEP

Total number in attendance: 61

Public Input No. 1-NFPA 105-2025 [Section No. 1.1]

1.1 Scope.

This standard shall prescribe minimum requirements for smoke-leakage-rated door assemblies for use in providing safety to life and protection of property from smoke.

Statement of Problem and Substantiation for Public Input

By inserting he words "leakage-rated" between "smoke" and " door" this proposal aligns NFPA 105 with the current terminology used in NFPA 101 and NFPA 5000 where doors are required to comply with the testing of UL 1784, Standard Air Leakage Tests for Door Assemblies and Other Opening Protectives." Further, the existing terminology "smoke door assemblies" is not used in any NFPA code. Additionally, the building codes, past and present, use the term "Smoke & Draft Control" for doors complying with UL 1784. For this reason the Technical Committee should strongly consider adopting the term "Smoke & Draft Control Doors" to emlinate confiusion between NFPA codes and standards and the building codes.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 2-NFPA 105-2025 [Section No. 1.1]	

Submitter Information Verification

Submitter Full Name: Keith Pardoe
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Submittal Date: Wed Jan 22 09:52:53 EST 2025
Committee: FDW-AAA

Public Input No. 2-NFPA 105-2025 [Section No. 1.1]

1.1 Scope.

This standard shall prescribe minimum requirements for smoke leakage-rated door assemblies for use in providing safety to life and protection of property from smoke.

Statement of Problem and Substantiation for Public Input

While this proposal is attached to section 1.1 Purpose, the Technical Committtee should consider changing the terminology to "smoke leakage-rated door assemblies" throughout NFPA 105, including (and especially) in its title. NFPA 105's current terminology "smoke door assemblies" is not used in NFPA codes or the building codes, past and present. Further, the Technical Committee should consider adopting the building codes' terminology "Smoke & Draft Control Doors" to eliminate confusion between the building codes and NFPA 105.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 1-NFPA 105-2025 [Section No. 1.1]	
Public Input No. 1-NFPA 105-2025 [Section No. 1.1]	

Submitter Information Verification

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Submittal Date: Wed Jan 22 10:12:22 EST 2025
Committee: FDW-AAA

Public Input No. 4-NFPA 105-2025 [Section No. 1.2]

1.2* Purpose.

The purpose of this standard ~~shall be to~~ is to set national standards for the installation, inspection, testing, and maintenance of smoke leakage-rated door assemblies and other opening protectives used to provide a means ~~to restrict~~ of restricting and retarding the movement of smoke through and around door assemblies~~ in order to maintain a tenable environment~~ .

Statement of Problem and Substantiation for Public Input

NFPA 105's purpose and application has evolved; this proposal seeks to update its Purpose statement(s) to reflect its current provisions and requirements.

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Public Input No. 3-NFPA 105-2025 [Section No. 1.3 [Excluding any Sub-Sections]]

This standard shall regulate the installation, maintenance, and testing of ~~smoke door assemblies~~ all types of smoke-leakage-rated opening protectives that are intended to restrict the passage of smoke at temperatures up to 400 ° F (204 ° C) .

Statement of Problem and Substantiation for Public Input

The exisitng language refers only to "smoke door assemblies" and it ignores the other types of opening protectives covered in NFPA 105. Regarding "smoke door assemblies" that term doesn't have any context the previaling of the model building codes (past and present) term is "Smoke & Draft Control Doors." NFPA 101 and NFPA 5000 use the term "Smoke-Leakage-Rated" when referring to the same doors. This proposal also merges the latter part of 1.3.1 with 1.3, rendering the existing 1.3.1 unnecessary (see PI #6).

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 6-NFPA 105-2025 [Section No. 1.3.1]	
Public Input No. 6-NFPA 105-2025 [Section No. 1.3.1]	

Submitter Information Verification

Submitter Full Name: Keith Pardoe
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Submittal Date: Wed Jan 22 10:27:20 EST 2025
Committee: FDW-AAA

Public Input No. 6-NFPA 105-2025 [Section No. 1.3.1]

~~1.3.1~~ ~~*~~ –

~~This standard shall regulate smoke door assemblies that are intended to restrict the passage of smoke at temperatures up to 400°F (204°C).~~

Statement of Problem and Substantiation for Public Input

This section can be deleted if/when PI 3 is accepted and its annex commentary be inserted at the end of A.1.3.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 3-NFPA 105-2025 [Section No. 1.3 [Excluding any Sub-Sections]]	
Public Input No. 3-NFPA 105-2025 [Section No. 1.3 [Excluding any Sub-Sections]]	

Submitter Information Verification

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Committee: FDW-AAA

Public Input No. 7-NFPA 105-2025 [Section No. 1.3.3]

1.3.3*

This standard shall regulate the ~~periodic~~ inspection, testing, and maintenance of all types of smoke leakage -rated opening protectives not explicitly included in this document .

Statement of Problem and Substantiation for Public Input

The existing language seems to exempt new installations of smoke leakage-rated from acceptance testing; striking the word "periodic" eliminates such interpretation. The term "smoke-rated" has no context or application; "smoke leakage-rated" is consistent with other NFPA codes.

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Committee: FDW-AAA

Public Input No. 5-NFPA 105-2025 [Section No. 1.4]

1.4 Retroactivity.

1.4.1 This standard is based on product and engineering practices recognized as acceptable at the date of issue. ~~Therefore,~~ [80:1.4.1]

1.4.2 Unless otherwise noted, it is not intended that the provisions of this ~~standard are not intended~~ document to be applied ~~retroactively~~ to facilities, equipment, structures, or installations that were ~~in compliance at the time of installation.~~ existing or approved for construction or installation prior to the date of this document. [80:1.4.2]

1.4.3 In those cases where it is determined by the AHJ that the existing situation involves a distinct hazard to life or property, retroactive application of the provisions of this document shall be permitted. [80:1.4.3]

Statement of Problem and Substantiation for Public Input

NFPA 105's inspection and testing provisions are intended to be applied to new and existing installations of smoke leakage-rated doors and other opening protectives. However, 5.1.1.2 states the reqiurements of chapter 5 apply to both new and existing installations even though Section 1.4 Retroactivity specifically exempts existing installation from complying with NFPA 105. The proposed improvements correct this inconsistency and are consistent with the same requirements in NFPA 80.

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Committee: FDW-AAA

Public Input No. 53-NFPA 105-2025 [Section No. 2.3.1]

2.3.1 ASME Publications.

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

ASME A17.1/CSA B44, *Safety Code for Elevators and Escalators*, ~~2019~~ 2025 .

Statement of Problem and Substantiation for Public Input

To update referenced standard to latest edition to ensure alignment.

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Submittal Date: Mon Jun 02 10:46:17 EDT 2025
Committee: FDW-AAA

Public Input No. 49-NFPA 105-2025 [Section No. 2.3.3]

2.3.3 UL Publications.

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

UL 10B, *Fire Tests of Door Assemblies*, 2008, revised ~~2020~~ 2024 .

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

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

UL 555S, *Smoke Dampers*, 2014, revised 2020.

UL 864, *Standard for Control Units and Accessories for Fire Alarm Systems*, ~~2014~~ 2023 , revised ~~2020~~ 2024 .

UL 1784, *Air Leakage Tests of Door Assemblies*, 2015, revised ~~2020~~ 2025 .

Statement of Problem and Substantiation for Public Input

Update of UL references to the document.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 52-NFPA 105-2025 [Section No. C.1.2.5]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
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Submittal Date: Sat May 31 17:38:55 EDT 2025
Committee: FDW-AAA

Public Input No. 34-NFPA 105-2025 [New Section after 3.3]

<<INSERT NEW DEFINITION>>

<<#>> *** Gasketing.** Supplemental materials, either surface-applied to door frames or built into the doors, listed and labeled for use in sealing against the passage ambient- and elevated-temperature smoke and gases.

A. <<#>> **Gasketing.**

Gasketing is comprised of various pilable materials (e.g., silicone, neoprene, and vinyl) used to substantially seal the clearance gaps between door frames and doors and under the doors against the passage of smoke. These materials should be tested, labeled, and listed in accordance with UL 1784, Air Leakage Tests of Door Assemblies and Other Opening Protectives. Gasketing should be installed in accordance with the doors' listings, as well as their individual listings and installation instructions.

(See A.1.3.1 and A.3.3.8.2 for related information.)

Statement of Problem and Substantiation for Public Input

The proposed new definition describes what gasketing is used for and its function on smoke-leakage-rated doors.

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Submittal Date: Tue Feb 04 11:29:23 EST 2025
Committee: FDW-AAA

Public Input No. 48-NFPA 105-2025 [Section No. 3.3.3]

3.3.3 Qualified Person.

A person who, by possession of a recognized degree, certificate, professional standing, or skill, and who, by knowledge, training, and experience, has demonstrated the ability to deal with the subject matter, the work, or the project**, as acceptable to the AHJ** .

Statement of Problem and Substantiation for Public Input

The addition of the phrase “as acceptable to the AHJ” ensures that enforceable minimum qualifications can be established while preserving the AHJ’s authority to consider regional licensing, certification, or competency programs that meet the intent of the standard. This approach balances national consistency with local flexibility, ultimately improving safety, compliance, and clarity for all stakeholders involved.

Submitter Information Verification

Submitter Full Name: Christopher Ruch
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Affiliation: SMART, SMW Local Union No. 104
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Submittal Date: Fri May 30 17:04:22 EDT 2025
Committee: FDW-AAA

Public Input No. 50-NFPA 105-2025 [New Section after 3.3.4]

3.3.3* Reclaimed Smoke Rated Assembly.

An existing smoke rated assembly, or any portion thereof, that was formerly installed in the field now intended for reuse or repurposing and reinstallation as an alternative to newly manufactured smoke rated opening protective products.

A.3.3.3

As a sustainability policy initiative intended to reduce opening protective assemblies or components removed from buildings undergoing demolition from becoming landfill waste, opening protective assemblies or components may be proposed for reuse and reinstallation. As life-safety products, reclaimed smoke rated assemblies or components should be properly reconditioned, inspected, and tested, as appropriate for their intended function.

Statement of Problem and Substantiation for Public Input

This proposal aims to create language to limit the use of reclaimed materials for use in smoke rated opening protectives. It is understood that there may be efforts to reduce waste and promote sustainable solutions by means of reusing products such as smoke doors and their components. However, there are no guidelines to permit a process of using reclaimed materials, while ensuring the smoke rated opening will maintain the intended smoke protection performance. Smoke rated openings consist of multiple listed products such as doors, frames, hardware, gasketing, and glazing where the combination is critical to create a compliant opening.

Additionally, smoke doors commonly function as a normal mode of egress for day-to-day operation, where the normal to high levels of wear and tear will exist. Following the guidelines of NFPA 105, an installation involving a reclaimed smoke door would only be subjected to the installation requirements of a new fire door, not accounting for any unseen damage or progression of modifications throughout the former life of the reclaimed smoke door.

There are more examples and speculation that can be raised, but ultimately, the intention is to ensure that NFPA 105 includes language to limit the use of reclaimed products in an uncontrolled and, potentially, noncompliant manner. The building codes rely on the use of listed products for the protection of openings in smoke rated assemblies and using reclaimed materials in an uncontrolled way potentially removes traceability of the origin of a product, affecting the integrity of labeled products and the product certifications.

Lastly, this proposal can benefit from the technical expertise of the committee, and it is understood that this current proposal may not fully address the concerns associated with the use of reclaimed materials. A task group or some other effort to expand the conversation on this topic may be something for the committee to consider.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 51-NFPA 105-2025 [Section No. 5.1.2]	

Submitter Information Verification

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Submittal Date:	Sat May 31 17:40:38 EDT 2025
Committee:	FDW-AAA

Public Input No. 33-NFPA 105-2025 [Section No. 3.3.5]

3.3.5 Smoke-Leakage-Rated Door Assembly.

Any combination of a door, frame, hardware, and any other accessories ~~that~~ subjected to testing in accordance with UL 1784, *Air Leakage Tests of Door Assemblies and Other Opening Protectives*, that together restrict smoke movement through door openings by limiting the amount of air that can pass through the assembly.

Statement of Problem and Substantiation for Public Input

As written, the existing definition of Smoke Door Assembly can be applied to any type of door assemblies. The proposed revision clarifies that the term only applies the various types of doors subected to UL 1784 testing.

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Submittal Date: Tue Feb 04 11:24:03 EST 2025
Committee: FDW-AAA

Public Input No. 8-NFPA 105-2025 [Section No. 4.1]

4.1 General.

This chapter shall cover the requirements for air-leakage testing of ~~smoke door assemblies.~~ new smoke leakage-rated doors complying with Chapter 6.

Statement of Problem and Substantiation for Public Input

The proposed change is consistent with language used in chapters 4 and 5 in NFPA 80 by expressly directing users to Chapter 6 for more information.

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Submittal Date: Wed Jan 22 12:24:10 EST 2025
Committee: FDW-AAA

Public Input No. 9-NFPA 105-2025 [Section No. 4.2.1]

4.2.1

~~The size~~ For doors complying with Chapter 6, the sizes of the ~~door to be tested shall be~~ test samples shall be 3 ft × 7 ft (0.9 m × 2.1 m) for a ~~single side-hinged swinging door~~ single door, and 6 ft × 7 ft (1.8 m × 2.1 m) for a pair of ~~side-hinged swinging doors and all other doors, or shall be~~ doors.

4.2.1.1 Test samples of doors and opening protectives of other designs shall be a minimum of 6 ft × 7 ft (1.8 m × 2.1 m), or otherwise representative of the full range of ~~smoke door~~ the manufacturer's production for that type of construction as determined by the testing laboratory.

Statement of Problem and Substantiation for Public Input

The proposed changes seek to comply with NFPA's manual of style (e.g., one "shall" per statement), as well as clarifying the test-sample-sizes for Chapter 6 doors. The words "side-hinged swinging" of the existing language are rendered redundant by adding "For doors complying with Chapter 6." Test samples of doors (and curtains) of other designs (e.g., overhead rolling doors, etc.) might be larger or smaller depending on materials and construction, and determined by the testing laboratory. Likewise, for opening protectives that are not covered elsewhere in NFPA 105.

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Committee: FDW-AAA

Public Input No. 38-NFPA 105-2025 [Section No. 4.3.2]

4.3.2*

~~Smoke door assemblies intended for installation where pressurization is provided to control smoke movement shall not have an artificial bottom seal installed during the test~~

Where required, the air leakage rates of door assemblies shall be tested without the use of artificial bottom seals .

Statement of Problem and Substantiation for Public Input

The proposed revision to 4.3.2 clarifies that the referenced "test" is the air leakage test (UL 1874) of the assemblies. The phrase "where required" alerts users that the prevailing codes require the bottom gaps under certain smoke-leakage-rated door assemblies to be sealed.

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Submittal Date: Wed Feb 05 11:12:17 EST 2025
Committee: FDW-AAA

Public Input No. 40-NFPA 105-2025 [Section No. 4.5]

4.5 ~~Installation~~ **Actuation Devices for Smoke-Leakage-Rated Doors .**

4.5.1

~~Smoke doors shall be self-closing or automatic closing in accordance with NFPA 80~~ **General.**

4.5.1.1* Actuation devices for the release of smoke-leakage-rated doors shall be permitted to be part of an overall system that releases the doors.

4.5.1.2 Actuation devices and their components shall be installed in accordance with the manufacturers' instructions. [80:4.7.1.2]

4.5.1.3 Where 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. [80:4.7.1.3]

4.5.1.4 Smoke-leakage-rated doors incorporating devices that delay activation of an automatic-closing, self-closing, or emergency power operation shall not delay the initiation of the closing or reclosing of the door for more than 10 seconds, unless otherwise acceptable to the AHJ.

4.5.2* **Smoke Detectors.** Smoke detectors shall be located in accordance with *NFPA 72* .

4.5.

~~2~~

~~Automatic closing smoke door assemblies shall be activated by smoke detection installed in accordance with *NFPA 72* .~~ 3 **Heat Detectors.**

4.5.3.1 Heat detectors shall be installed on ceilings and walls outside of the dead air space shown in Figure 4.5.3.1(a).

~~**4.5.5** –~~

~~Louvers shall not be installed in smoke door assemblies unless otherwise tested and listed.~~

4.5.3 –

~~Devices for the release of smoke doors shall be permitted to be part of an overall system, such as a fire alarm or an automatic extinguishing system, that shall release the door and shall be installed and tested in accordance with *NFPA 72* .~~

~~**4.5.4** –~~

~~The opening between the bottom edge of the smoke door and the sill when the door is in the closed position shall not be required to be provided with a means to seal the opening.~~

~~**4.5.4.1** –~~

~~Smoke door assemblies installed where pressurization is provided to restrict smoke movement shall be required to have a bottom seal.~~

.2 Unless otherwise acceptable to the AHJ, heat detectors shall be installed on both sides of the the wall in the locations shown in Figure 4.5.3.1(b) and interconnected so that the operation of any single heat detector causes the door to close. [80:4.7.3.2].

4.5.4 Fusible Links.

4.5.4.1 * Except as required by 4.5.4.2 and 4.5.4.3, fusible links shall be placed as shown in Figure 4.5.3.1(a).

4.5.4.2 * Unless otherwise acceptable to the AHJ, fusible links shall be located on both sides of the wall and interconnected so that the operation of any single fusible causes the doors to close. [80:4.7.4.2]

4.5.4.3 * Where used, fusible links shall be installed in accordance with 4.5.4.3.1 through 4.5.4.3.3. [80:4.7.4.3]

4.5.4.3.1 Fusible links shall be located at or near the ceiling on the side of the wall on which the door is installed. [80:4.7.4.3.1]

4.5.4.3.2 Fusible links shall be located at or near the top of the opening on each side of the wall. [80:4.7.4.3.2]

4.5.4.3.3* A sleeve shall be installed through the wall to provide an open pathway for the cable or chain connecting fusible links. [80:4.7.4.3.3]

4.5.4.3.3.1 The sleeve shall be 1/2 in. (13 mm) diameter galvanized steel conduit or pipe with the ends deburred. [80:4.7.4.3.3.1]

4.5.4.3.3.2 The sleeve shall be fitted with a collar or bushing at each end to secure the sleeve around the wall. [80:4.7.4.3.3.2]

4.5.4.3.3.3 The sleeve shall allow free movement of the cable or chain upon fusing of the links. [80:4.7.4.3.3.3]

A.4.5.1.1 Examples of overall systems that release smoke-leakage-rated doors include fire alarms, water flow alarms, carbon dioxide releasing systems, and other approved systems.

A.4.5.2 <<Insert NFPA 72-2022 Figure A.17.7.4.2.1, Example of Proper Mounting of Smoke Detectors>> See Figure A.4.5.2.

A.4.5.4.1 When the automatic-closing device of a door is installed above a ceiling, detectors should be used to activate automatic closing to avoid the complexity of routing fusible link assemblies where means of activation are either required below the ceiling or above and below the ceiling.[80:A.4.7.4.1]

A.4.5.4.2 The arrangements shown in Figure A.4.5.4.2(a) through Figure A.4.5.4.2(l) are recommended to provide the performance intended. Other arrangements acceptable to the AHJ could be permitted to be used. <<INSERT AND RENUMBER THE RELATED IMAGES FROM A.4.7.4.2 IN NFPA 80.>>

A.4.5.4.3 Wall sleeves required for the installation of fire door fusible links on both sides of a wall are unlike many other wall penetrations for pipes, conduits, ducts, and the like. Such sleeves must remain open and unobstructed for free movement of the fusible link cable/chain upon fusing of the links. Firestopping , other sealants, or other materials should not be used on sleeves because they can encumber movement and prevent automatic closing of a fire door in a fire event.
It is important that cables, chains, or any components of the fusible link assembly do not hang up on eye bolts or pulleys, through-wall sleeves, any part of the building structure, or any component of the fire door assembly. It is also important that components not be coated or affixed with foreign material that could obstruct free operation of the release system. Examples of foreign material might include fireproofing, firestopping, paint, or spray texturing. [80:A.4.7.4.3.3]

Statement of Problem and Substantiation for Public Input

Some of the items under 4.5 Installation are more appropriately addressed under the specific door chapter. More importantly, this section should address the requirements for smoke and heat detectors, and fusible links. Even though NFPA 105 does not contain a chapter for overhead rolling doors,

Chapter 5 contains inspection criteria for them. These systems routinely require fusible links to create fail-safe systems. The proposed revisions and additions mirror similar provisions in NFPA 80. Current items 4.5.4, 4.5.4.1, and 4.5.5 apply doors complying with Chapater 6 and might be appropriately addressed in that chapter. Additionally, the conditions under 4.5.5 are addressed in the prevailing building codes.

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Committee: FDW-AAA

Public Input No. 17-NFPA 105-2025 [Section No. 5.1.1.1]

5.1.1.1*

This chapter shall cover the inspection, testing, and maintenance of smoke ~~door assemblies.~~ leakage-rated doors and other opening protectives other than smoke dampers, smoke-protective curtain assemblies, and smoke-protective curtain assemblies for hoistways.

A.5.1.1.1 Inspection, testing and maintenance provisions for smoke dampers,smoke-protective curtains, and smoke-protective curtains for hoistways are covered in their respective chapters.

Statement of Problem and Substantiation for Public Input

The chapters for smoke dampers and smoke curtains contain the respective inspection, testing, and maintenance provisions and requirements. Accordingly, this proposal clarifies that these opening protectives are not subject to Chapter 5's provisions and aligns NFPA 105's requirements with NFPA 80's.

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Submittal Date: Thu Jan 23 11:03:13 EST 2025
Committee: FDW-AAA

Public Input No. 13-NFPA 105-2025 [New Section after 5.1.1.2]

5.1.1.3

Where inspection and testing criteria for smoke leakage-rated door assemblies are not listed in this chapter, such door assemblies and opening protectives shall be inspected and tested in accordance with all the following:

(1)* The requirements of this standard that were in effect at the time of installation.

(2) The manufacturers' published listings and installation instructions.

(3)* The requirements of this chapter, Chapter 4, as applicable, where the manufacturers' published listings and installation instructions are not available.

A.5.1.1.3(1) Door assemblies should be inspected in accordance with the requirements of this standard that were in effect at the time of installation. Where replacement door assembly components (e.g., door leaves, glass and glazing materials, and hardware) have been installed the assemblies, the replacement components should be inspected in accordance with the editions of this standard in effect at the time of replacement.

Operational testing of new and existing door assemblies should be conducted in accordance with the current requirements of this standard.

A.5.1.1.3(3) Installation instructions and published listing information might not be available for older existing door assemblies. In these cases, installations of these assemblies should be inspected in accordance with the respective requirements of the editions of this standard that were in effect at the time of installation.

Statement of Problem and Substantiation for Public Input

This proposed change aligns NFPA 105's inspection of older exisitng smoke leakage-rated doors with similar provisions in NFPA 80. Doors (and other opening protectives) should be inspected in accordance with the codes and standards that were in effect at the time of installation. Owners are not required to perpetually upgrade door assemblies as codes and standards evolve after installtion is completed.

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Committee: FDW-AAA

Public Input No. 51-NFPA 105-2025 [Section No. 5.1.2]

5.1.2 Removal of Smoke Doors.

5.1.2.1 Where a smoke door no longer functions as an opening or is removed and not replaced, the opening shall be filled with construction to maintain the smoke partition or smoke barrier properties of the wall.

5.1.2.2 A removed smoke door assembly shall not be reclaimed for reinstallation or reuse in other openings in the same or separate building unless otherwise approved by the AHJ in accordance with 5.1.4.2.

5.1.4 Replacement.

5.1.4.1 Where it is necessary to replace all or part of a smoke door assembly, replacement components shall be installed to meet the requirements of this standard and the manufacturer's instructions.

5.1.4.2*

Materials, including the doors, windows or their frames, glazing materials, hardware, gasketing, and closing mechanisms shall not be reclaimed, reused, or reinstalled unless such elements have been reconditioned, tested, and placed in good and proper working condition and approved by the AHJ.

5.1.4.2.1 Upon completion of the installation, the reclaimed smoke rated assembly shall be inspected and retested in accordance with 5.2.

A.5.1.4.2

Smoke rated assemblies may consist of multiple listed products such as frames, hardware, gasketing, glazing, and the door itself, where the combination is critical to create a compliant opening. Additionally, smoke rated assemblies may also function as a normal mode of egress for day-to-day operation, where the normal to high levels of wear and tear will exist.

When an AHJ is considering the permitted use and installation of a reclaimed smoke rated assembly, consideration should be given to the age and overall condition of the components, the proper functioning of all hardware, the compatibility of the components, the reconditioning performed, the original labeling for the smoke protection rating, and previously listed installation.

Statement of Problem and Substantiation for Public Input

This proposal aims to create language to limit the use of reclaimed materials for use in smoke rated opening protectives. It is understood that there may be efforts to reduce waste and promote sustainable solutions by means of reusing products such as smoke doors and their components. However, there are no guidelines to permit a process of using reclaimed materials, while ensuring the smoke rated opening will maintain the intended smoke protection performance. Smoke rated openings consist of multiple listed products such as doors, frames, hardware, gasketing, and glazing where the combination is critical to create a compliant opening.

Additionally, smoke doors commonly function as a normal mode of egress for day-to-day operation, where the normal to high levels of wear and tear will exist. Following the guidelines of NFPA 105, an installation involving a reclaimed smoke door would only be subjected to the installation requirements of a new fire door, not accounting for any unseen damage or progression of modifications throughout the former life of the reclaimed smoke door.

There are more examples and speculation that can be raised, but ultimately, the intention is to ensure that NFPA 105 includes language to limit the use of reclaimed products in an uncontrolled and, potentially, noncompliant manner. The building codes rely on the use of listed products for the

protection of openings in smoke rated assemblies and using reclaimed materials in an uncontrolled way potentially removes traceability of the origin of a product, affecting the integrity of labeled products and the product certifications.

Lastly, this proposal can benefit from the technical expertise of the committee, and it is understood that this current proposal may not fully address the concerns associated with the use of reclaimed materials. A task group or some other effort to expand the conversation on this topic may be something for the committee to consider.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 50-NFPA 105-2025 [New Section after 3.3.4]	

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Public Input No. 11-NFPA 105-2025 [Section No. 5.1.3.1]

5.1.3.1*

Smoke doors shall be operable at all times except after exposure to elevated temperature .

Statement of Problem and Substantiation for Public Input

The proposed change is consistent with the commentary at the end of A.5.1.3.1. Unlike the fire door test standards, UL 1784 is silent on whether the test samples must be operable AFTER the elevated temperature test.

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Committee: FDW-AAA

Public Input No. 37-NFPA 105-2025 [Section No. 5.1.3.2]

5.1.3.2

Smoke doors shall be kept closed or arranged for automatic closing~~, unless otherwise permitted~~ .

Statement of Problem and Substantiation for Public Input

Codes require these doors to have self-closing or automatic-closing operations; the phrase "unless otherwise permitted" creates the impression that some doors can be manually-operated.

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Submittal Date: Tue Feb 04 15:40:03 EST 2025
Committee: FDW-AAA

Public Input No. 10-NFPA 105-2025 [Section No. 5.1.3.3]

~~5.1.3.3~~ –

~~Where required, the doors shall be positively latched.~~

Statement of Problem and Substantiation for Public Input

The existing 5.1.3.3 can be deleted since doors complying with Chapter 6 require positive latching in order to pass UL 1784 testing and other types of opening protectives (e.g., overhead rolling doors, etc.) do not require positive latching. As currently written, users might interpret 5.1.3.3 to mean that some swinging smoke leakage-rated doors do not require positive latching.

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Public Input No. 12-NFPA 105-2025 [Section No. 5.1.4]

5.1.4 Replacement.

Where it is necessary to replace all or part of a smoke leakage-rated door assembly, ~~replacement~~ components ~~shall~~ and assemblies shall be installed~~ to meet the requirements of this standard and the manufacturer's instructions.~~ , inspected, and tested as required by this standard for new installations.

Statement of Problem and Substantiation for Public Input

The proposed change clarifies that replacement smoke leakage-rated door assemblies must comply with NFPA 105's provisions and requirements for new installations in effect at the time of replacement. This statement is consistent with NFPA 80's similar provision.

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Public Input No. 30-NFPA 105-2025 [Sections 5.2.3.1, 5.2.3.2]

Sections 5.2.3.1, 5.2.3.2

5.2.3.1

~~Records of the acceptance tests~~ Acceptance testing records shall be retained for the life of each assembly.

5.2.3.1.1 Upon completion of maintenance affecting the operation and function assembly in accordance with 5 .4.8, acceptance testing records shall be updated.

5.2.3.2*

Unless a longer period is required by NFPA 80, periodic inspection and testing records shall be retained for a period of at least 3 years.

Statement of Problem and Substantiation for Public Input

The proposed revisions clarify the different records keeping requirements for acceptance testing and periodic inspection and testing processes.

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Committee: FDW-AAA

Public Input No. 31-NFPA 105-2025 [Section No. 5.2.4.4.2]

5.2.4.4.2

As a minimum, the following items shall be verified:

(1) Labels on fire-rated smoke door assemblies are clearly visible and legible and bear the "S" label marking.

(2) Door leaves without fire protection ratings comply with 6.3.1.

(3) Door frames comply with 6.3.2.

(4) Gasketing along the vertical edges of the door and across the top of the door and, where required by the door's listing , at meeting edges of pairs of doors forms a continuous seal that is not cut, notched, or otherwise modified to accommodate other hardware items.

(5) Gasketing materials, where required by the door's listing , are intact and close the gaps between the door and frame to seal the door opening against the passage of smoke.

(6) Doors installed in ~~pressurized applications~~ locations prohibiting an artificial seal duirng UL 1784 testing, have a bottom seal~~, where required~~ .

(7) Doors equipped with bottom seals that automatically project to fully seal the gap under the door in the closed position do not interfere with the swinging of the door when retracted or the closing of the door when projected.

(8) No open holes or breaks exist in the surfaces of either the door or the frame.

(9) Glazing, vision light frames, and glazing beads are intact and securely fastened in place, if so equipped.

(10) Glazing materials and vision light kits comply with Sections 6.5 and 6.6.

(11) Glazing materials, vision light kits, and glazing beads are continuously sealed.

(12) The door, frame, hinges, and other hardware are secured, aligned, and in working order with no visible signs of damage.

(13) No parts are missing or broken.

(14) Door clearances do not exceed dimensions listed in 6.3.3 when measured on the pull side of the door(s).

(15) ~~The self-closing device is operational; that is, the active door completely closes when operated from the full open position.~~

(16)

(17) ~~If a coordinator is installed, the~~ Where coordinators are installed on paired doors, the inactive leaf closes before the active leaf.

(18) ~~Where positive latching is required, latching~~ Latching hardware operates and secures the door when the door is in the closed position.

(19) Where door leaves, other than doors arranged for automatic closing, are permitted to be held open with friction door holder devices, the door holder devices comply with 6.3.6.6.

<<Edit (15) as follows:>>

(15)* Doors open and close freely without binding from the full open and any partially open positions.

A.5.2.4.4.2(15) Verifying that swinging smoke-leakage-rated doors swing freely throughout their full range of travel is essential to their ability to resist the passage of smoke as intended. Frequently, when swinging doors are opened beyond the minimum width to allow passage (about 70-80 degrees), they bind against uneven and unlevel floors and flooring materials. In some instances, this binding prevents the doors from closing. Similarly, doors binding against door frames or opposing leaves of paired doors might prevent the doors from closing completely and latching. Closing devices on doors with self-closing and automatic-closing operations should be adjusted to ensure the doors close reliably from any open position. Bottom-sealing components (e.g., automatic door bottoms, sweeps, and thresholds) should not interfere with or impair the opening and closing of the doors. Several iterations of functional testing from the full and multiple other open positions (e.g., slightly ajar, 80, 70, 30, etc.) might be needed to confirm the closing devices are adjusted to close doors and overcome resistance from latching hardware reliably.

Statement of Problem and Substantiation for Public Input

As currently written, Item (15) can be (and often is) interpretted to mean that door closing devices on swinging doors to ONLY close from the full-open position. However, doors with self-closing and automatic-closing operations be able the doors from slightly ajar and full-open positions, and any point in between. Equally important is that many swinging doors bind against uneven and unlevel floors and flooring materials that can impair or prevent doors from closing when opened to the full extent of their travel. The proposed revision clarifies that inspection and operational testing of swinging smoke-leakage-doors includes verifying the doors close reliably from ANY open position.

The phrase "Where positive latching is required..." in Item (17) is misleading in that it makes it appear that positive latching hardware is not required on certain swinging smoke-leakage-rated doors. Since all the doors covered in NFPA 105 are tested under UL 1784—and, UL 1784 requires swinging doors to have positive latching hardware (see below). Strike that phrase from item (17) prevents confusion in the field.

The word "required" in Items (4) and (5) are ambiguous; gasketing materials are required by the listing(s) of the as tested under UL 1784. Most, if not all, swinging doors require ambient-temperature gasketing to perform as intended. Listings for wood and wood-composite swinging doors require additional gasketing materials to effectively seal the openings when exposed to elevated temperatures.

Excerpted from UL 1784 (January 16, 2025 edition):
"5.4.4 The closing forces necessary to operate a test sample incorporating a positive means of latching shall be measured and recorded. For opening protectives other than swinging doors, the closing force measurement method shall also be recorded.

6.2 Prior to conducting the Air Leakage Tests, Section 7, the operable panel of the test sample shall function as intended after being operated for five full-stroke close and reopen operations. The closing force necessary to close and latch the door or opening protective incorporating a positive means of latching before and after the cycling test shall be measured and recorded."

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Public Input No. 54-NFPA 105-2025 [Section No. 5.2.5.1]

5.2.5.1

Periodic inspection and testing shall be performed not less than annually.

5.2.5.1

Periodic inspection and testing shall be performed not less than annually in accordance with this standard and also, where applicable, in accordance with Chapter 5 of NFPA 80.

Statement of Problem and Substantiation for Public Input

Acceptance Testing has largely been associated with the initial installation of a smoke door assembly. The installation of a new smoke door assembly would not require maintenance. A maintenance requirement for a smoke door assembly is most often associated with future damage to parts, components or operational failures after the initial installation and Acceptance Testing has been completed. Therefore, the Maintenance section should reference section 5.2.5 Periodic Inspection and Testing, not 5.2.4 Acceptance Testing.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 55-NFPA 105-2025 [Section No. 5.4.8]	

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Committee: FDW-AAA

Public Input No. 55-NFPA 105-2025 [Section No. 5.4.8]

5.4.8

Upon completion of maintenance, smoke door assemblies shall be inspected and tested in accordance with 5.2.4.

5.4.8 _

Upon completion of maintenance, smoke door assemblies shall be inspected and tested in accordance with 5.2.5 .

Statement of Problem and Substantiation for Public Input

5.4.8
Upon completion of maintenance, smoke door assemblies shall be inspected and tested in accordance with 5.2.4.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 54-NFPA 105-2025 [Section No. 5.2.5.1]	Maintenance/Periodic Inspection and Testing

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Public Input No. 15-NFPA 105-2025 [Sections 5.4.8, 5.4.9, 5.4.10]

Sections 5.4.8, 5.4.9, 5.4.10

5.4.8

Upon completion of maintenance ~~, smoke door assemblies shall be inspected and~~ or repair work affecting the operation and performance of the assembly, the assembly shall be acceptance tested in accordance with 5.2.4.

5.4. ~~9~~ **8.1**

A record of these inspections and testing shall be made in accordance with 5.2.3.

5.4. ~~10~~ **8.2**

A record of maintenance performed on ~~existing~~ smoke door assemblies shall be provided that includes, but is not limited to, the following information:

(1) Date of maintenance
(2) Name of facility
(3) Address of facility
(4) Name of person(s) performing maintenance
(5) Company name and address of maintenance personnel
(6) Signature of maintenance personnel performing the work
(7) Individual listings of each maintained smoke door assembly
(8) Opening identifier and location of each repaired smoke door assembly
(9) Type and description of each repaired smoke door assembly
(10) Description or listing of the work performed on each smoke door assembly

Statement of Problem and Substantiation for Public Input

This proposal clarifies that the requirements of 5.4.9 and 5.4.10 continue/expand on 5.4.8, and are not standalone provisions. The proposed renumbering is consistent with the similar requirements in NFPA 80. Likewise, the proposed new language clarifies when a new round of acceptenance testing is required following substantial maintenance and repair work. Minor/cosmetic maintenance work (e.g., cleaning, painting, etc.) should not trigger acceptance testing.

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Public Input No. 14-NFPA 105-2025 [Section No. 6.1]

6.1 ~~*~~ – Doors.

6.1.1* General.

This chapter shall cover the installation of ~~side-hinged and side-pivoted swinging smoke door assemblies.~~ new and existing swinging smoke leakage-rated door assemblies.

6.1.1.1 New Doors.

6.1.1.1.1 New door assemblies shall be installed in accordance with this chapter, Chapter 4, and Chapter 5.

6.1.1.1.2 Upon completion of installation, acceptance testing of new door assemblies shall be performed in accordance with 5.2.4.

6.1.1.2 Existing Doors.

6.1.1.2.1 Existing door assemblies shall be periodically inspected and tested in accordance with 5.2.5 and 5.1.1.3.

6.1.1.3 Maintenance.

6.1.1.3.1 New and existing door assemblies shall be maintained in accordance with 5.4 and 5.6.

6.1.1.3.2 Upon completion of maintenance affecting the operation and performance of the assembly, doors shall be inspected and tested in accordance with 5.4.8.

6.2* Application, Installation, and Adjustment

6.2.1* General. The installation of all components of a smoke leakage-rated assembly shall be in accordance with the listings of each component.

6.2.2* Manufacturers' Instructions. All components shall be installed in accordance with the manufacturers' installation instructions.

6.2.2.1 Components shall be attached firmly to walls, doors, and frames in a manner specified by the manufacturers.

6.2.2.2 Components shall be attached by steel screws, bolts, or shields unless otherwise specified by the manufacturers.

6.2.3 Adjustment. Each component shall be adjusted to function as described in its listings.

A.6.2 In order for swinging smoke leakage-rated doors to effectively restrict the passage of smoke, each component needs to be installed, adjusted, and maintained in accordance with manufacturers' installation instructions.While some swinging smoke leakage-rated door assemblies are not fire-rated, the components comprising these systems have listings as tested under UL 1784, Air Leakage Tests of Door Assemblies and Other Opening Protectives. Many of the components used are also listed for use as part of a fire rated door assembly; they have separate listings commensurate with fire door testing, and should be installed and adjusted accordingly.

A.6.2.1 Similar to door assembly components comprising fire-rated swinging door assemblies, components, such as door leaves and gasketing, have listings from nationally recognized testing laboratories (NTRLs) for use as part of smoke-leakage-rated door assemblies (aka Smoke & Draft Control) for the applications for which they are intended. Many of these components can be used on fire-rated and non-fire-rated smoke-leakage-rated swinging door assemblies. Each component should be installed in accordance with its listings in concert with the listings of all the other components.

A.6.2.2 The ability of the assemblies to perform in the field as tested under *UL 1784, Air Leakage Tests of Door Assemblies and Other Opening Protectives,* depends greatly on each of the components being installed in strict accordance with the respective manufacturers' installation instructions.In particular, ambient-temperature gasketing materials should be installed so that they form an unbroken seal between the door frames and doors, and under doors when installed in certain locations as required by the applicable building, fire, and life safety codes. Careful attention to maintaining the specified clearance gap dimensions between door frames and doors is critical to the efficacy of the assemblies resistance to the passage of smoke.

Statement of Problem and Substantiation for Public Input

This proposal seeks to align Chapter 6's of NFPA 105 phrasing, terminology, and provisions with NFPA 80. The deleted terms "side-hinged" and "side-pivoted" are not used consistently and do not appear in NFPA 80; their deletion does not create a technical change and improves readability.

A proposed new section covering Application, Installation, and Adjustment—based on the similiar provisions in NFPA 80—alerts users that these door systems need to be properly installed, adjusted, and maintained.

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Public Input No. 26-NFPA 105-2025 [Section No. 6.3.2.1]

6.3.2.1

Where ~~permitted by other standards,~~ smoke-leakage-rated doors assemblies are not required to be fire rated, non-labeled steel door frames shall be ~~of steel construction or shall be of other designs that have been~~ permitted.

6.3.2.1.1 Door frames of other materials shall be tested and reported by a nationally recognized testing agency in accordance with ~~NFPA 252; UL 10B, Fire~~ *UL 1784, Air Leakage Tests of Door Assemblies* ~~; or UL 10C, *Positive Pressure Fire Tests of Door Assemblies*~~ *and Other Opening Protectives* .

Statement of Problem and Substantiation for Public Input

Existing 6.3.2 requires door frames for smoke-leakage-rated door assemblies to be labeled, and the frames can be of any fire-rated material. 6.3.2.1 expands on 6.3.2 by allowing non-labeled steel door frames and labeled door frames of other materials. This propposal changes the latter requirement to allow door frames of materials other than steel to comply with UL 1784 testing for non-fire-rated assemblies.

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Public Input No. 18-NFPA 105-2025 [Section No. 6.3.3]

6.3.3* Clearances.

~~Doors in smoke partitions shall have clearances in accordance with NFPA 80.~~ Clearance dimensions between doors and frames shall be measured on the pull side of the assemblies. [NFPA 80: 6.3.1.7.1]

6.3.3.1*

~~Doors in smoke barriers shall close the opening, leaving only the minimum clearance necessary for proper operation. The clearance under the bottom of a new door shall be a maximum of 3/4 in. (19 mm).~~ The clearance dimensions between doors and frames shall comply with NFPA 80.

6.3.3.2~~–~~ *

The maximum clearance between the bottom of ~~side-hinged or -pivoted swinging smoke~~ doors and the finished floor shall be not greater than ¾ in. (19 mm), unless otherwise permitted.

6.3.3.~~3~~ 4

Where the bottom of ~~the door is more~~ doors are more than 38 in. (965 mm) above the finished floor, the maximum clearance dimension under ~~the door~~ doors shall not exceed ⅜ in. (10 mm).

<<NEW>> A.6.3.3.1 Generally, clearance dimensions between non-fire-rated swinging doors and door frames are not expressly governed by building codes. In the case of clearance dimensions around and under non-fire-rated swinging smoke leakage-rated doors,such clearance dimensions should be within those specified in NFPA 80 due to the gasketing products used to meet the specified maximum air-leakage rate as tested in accordance with UL 1784, Standard for Air Leakage Tests of Door Assemblies and Other Opening Protectives. In instances where the clearance dimensions exceed those specified in NFPA 80, supplemental components might be needed to mitigate

<<RENUMBER EXISTING A.6.3.3.1 TO NEW A.6.3.3.2>>

Statement of Problem and Substantiation for Public Input

NFPA 105's current provisions for operating clearances for non-fire-rated smoke leakage-rated swinging doors are too subjective. For instance, existing 6.3.3.1's provision requiring "only the minimum clearance necessary..." is unenforceable; it can't be measured—most certainly, such minimum clearance dimensions are LESS THAN those specified in NFPA 80. Further, most doors in smoke barriers and smoke partitions are not required to be smoke leakage-rated meaning that they aren't subject to NFPA 105. The current language can be misconstrued to mean that all doors in smoke barriers are required to bear "S" labels, which is not the case. The existing 6.3.3.1's 3/4-inch clearance under doors is conflicts with existing 6.3.3.2's specification for the same clearance.

Regarding existing 6.3.3.2, since the entire subject matter of Chapter 6 is swinging doors, it is not necessary to include "side-hinged" and "side-pivoted."

A.6.3.3 references several industry standards that specify recommended clearance dimensions, which are LESS THAN the maximum clearance dimensions specified in NFPA 80.

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Public Input No. 19-NFPA 105-2025 [Section No. 6.3.5.1]

6.3.5.1* Self-Closing.

Self-closing doors shall swing easily and freely and close completely from the full-open and any partially open positions each time they are opened.

6.3.5.1.1 Self-closing doors shall be equipped with a closing device ~~that closes,~~ to cause the door ~~, causing it~~ to ~~latch, each time the door closes.~~ close and latch.

6.3.5.1.2 Closing devices shall not have manually-operated hold-open features or functions.

6.3.5.1.3 Manually-operated auxiliary hold-open devices shall not be permitted on self-closing doors.

Statement of Problem and Substantiation for Public Input

The exisitng provisions have been revised to be consistent with similar provisions in NFPA 80 and the NFPA Manual of Style. The new language clarifies that self-closing doors must close reliably from any open position, regardless of how far they are opened.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 20-NFPA 105-2025 [Section No. 6.3.5.2]	

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Committee: FDW-AAA

Public Input No. 20-NFPA 105-2025 [Section No. 6.3.5.2]

~~**6.3.5.2** –~~

~~The closing mechanism shall not have a hold-open feature.~~

Statement of Problem and Substantiation for Public Input

See PI-19—this provision is renumbered and revised.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 19-NFPA 105-2025 [Section No. 6.3.5.1]	

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Public Input No. 21-NFPA 105-2025 [Section No. 6.3.5.3]

6.3.5.3* Automatic Closing.

~~Automatic-closing doors shall be permitted to close automatically by means of the installation of a closing device and the following:~~

(1) ~~Upon release of the hold-open mechanism, the leaf becomes self-closing.~~

(2) ~~The release device is designed so that the leaf instantly releases manually and, upon release, becomes self-closing, or the leaf can be readily closed.~~

(3) ~~The automatic releasing mechanism or medium is activated by the operation of approved smoke detectors installed in accordance with the requirements for smoke detectors for door leaf release service in *NFPA 72* .~~

(4) ~~Upon loss of power to the hold-open device, the hold-open mechanism is released and the door leaf becomes self-closing.~~

(5) ~~The release by means of smoke detection of one door leaf in a smokeproof enclosure or a stair enclosure results in closing all door leaves serving the enclosure.~~

(6) ~~Where required, doors properly latch upon closing.~~

Where permitted, doors with automatic-closing operation shall close and latch during an alarm condition and be equipped with one of the following holder/release arrangements:
(1) A closing device and a separate, labeled, fail-safe door holder/release device.

(2) A closing device with an electrically controlled integral hold-open function.

(3)* An electrically controlled closing device that allows the door to swing freely under normal conditions.

6.3.5.3.1* The door closes upon release by one or a combination of approved smoke detectors.

6.3.5.3.1.1 Approved smoke detectors shall comply with NFPA 72 for releasing automatic-closing doors.

6.3.5.3.2 Upon loss of power to the holder/release device, the door becomes self-closing.

A.6.3.5.3 Doors with automatic-closing functions are self-closing doors that are electrically held open. These doors are intended to be held open to reduce the likelihood of them being blocked open (or otherwise tampered with) in manners preventing them from closing and latching under alarm conditions.

A.6.3.5.3(3) Closing devices might have an integral electrically-released mechanism that allows doors to operate without the typical resistance of the springs felt when opening doors. During alarm conditions, the mechanism is immediately released, and the doors become self-closing.

A.6.3.5.3.1 Electric-release closing devices might have built-in smoke detectors that can be used in lieu of standalone detectors in some applications.

Statement of Problem and Substantiation for Public Input

The proposed new content improves the readability and application for doors with automatic-closing operations. As written, the current provisions are not consistent with NFPA 80's automatic-closing provisions. The proposed reformating of this section provides users with clear and concise directions for non-fire-rated doors with automatic-closing operation. (An identical PI for NFPA 80 is submitted separately.) No technical changes were made to this section.

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Public Input No. 24-NFPA 105-2025 [Section No. 6.3.6.4.1]

6.3.6.4.1

~~Where~~ Latch bolts of panic hardware ~~is utilized, the latching device~~ devices shall not be ~~permitted to be mechanically held~~ capable of being manually held in the retracted position.

6.3.6.4.1.1 Panic hardware devices shall be permitted to be equipped with fail-safe electric latch retraction or dogging functions that hold latch bolts in the retracted position, provided the devices become self-latching under alarm and loss of power conditions .

Statement of Problem and Substantiation for Public Input

This proposal clarifies that panic hardware devices can have fail-safe electric latch retraction and dogging functions that hold the latch bolts retracted until released under alarm and loss of power conditions. As currently written, 6.3.6.4.1 prohibits manually-operated dogging functions (e.g., by allen wrench or keyed cylinders—or any other user modification).

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Public Input No. 28-NFPA 105-2025 [Section No. 6.3.6.7]

6.3.6.7* Protection Plates.

Doors without fire protection rating ~~are~~ shall permitted to have non-rated, factory- or field-applied protection plates of unlimited size, unless otherwise restricted by the door or the protection plate manufacturers' specifications.

Statement of Problem and Substantiation for Public Input

The use of "are" is inconsistent with NFPA's Manual of Style of phrasing mandatory requirements; the word "shall" replacing it is the preferred phrasing.

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Submittal Date: Thu Jan 30 10:53:56 EST 2025
Committee: FDW-AAA

Public Input No. 27-NFPA 105-2025 [Section No. 6.7]

6.7* Gasketing and Astragals.

6.7.1 Gasketing.

Where required by the door listing and installation instructions , the gaps between the top and vertical edges of the door and frame and between the meeting edges of pairs of doors shall be ~~closed with labeled gasketing material in accordance with the gasketing manufacturer's published listings~~ sealed against the passage of smoke at ambient and elevated termperatures .

6.7.1.1 * _

~~Gasketing material shall form~~ Gasketing shall be installed in accordance with its listings and installation instructions to form a continuous seal along the top and vertical edges of the doors and at meeting edges of pairs of doors.

6.7.1. 1.1 Breaking, cutting, and notching, of gasketing materials to fit around hardware components shall not be permitted unless otherwise specified in the installation instructions.

6.7.1.1. 2 Where door frames with terminated stops are used, gasketing shall not be required to extend below the point of termination.

6.7.1.2 *

Where mortising of doors to receive hardware items creates a void along the vertical or top edges of doors, soffit-mounted gasketing shall be required.

6.7.1.3*

Where required, gaps between the bottom of the doors and the floor shall be closed with labeled gasketing in accordance with the gasketing manufacturer's published listing.

6.7.1.4

Automatic door bottoms that close the gap between the bottom of the door and the floor or threshold shall be permitted to be installed.

6.7.2 Astragals.

Doors swinging in pairs, where located with a means of egress, shall not be equipped with astragals that inhibit the free use of either leaf.

Statement of Problem and Substantiation for Public Input

This proposal seeks to clarify that many smoke-leakage-rated doors (e.g., wood and composite doors) require gasketing for both ambient and elevated temperatures. Many hollow metal (aka steel) doors only require ambient temperature gasketing due to the doors'expansion when exposed to elevated temperatures.

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Public Input No. 36-NFPA 105-2025 [Section No. 6.7.1.1]

6.7.1.1*

Gasketing material shall form a continuous seal along the top and vertical edges of the doors and at meeting edges of pairs of doors.

6.7.1.1.1 Gasketing materials on door frames of assemblies that are not required to be tested without an artificial seal by *UL 1784, Air Leakage Tests of Door Assemblies and Other Opening Protectives*, shall not be required to extend below the lowest portion of terminated stops.

A.6.7.1.1.1

Statement of Problem and Substantiation for Public Input

placeholder

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Submittal Date: Tue Feb 04 15:20:45 EST 2025
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Public Input No. 56-NFPA 105-2025 [Section No. 7.1.1]

7.1.1 Listings.

Dampers shall be listed in accordance with 7.1.1.1 ~~and~~ through 7.1.1.~~2~~ 3 .

7.1.1.1

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

7.1.1.2

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

7.1.1.3

Damper position indicator devices used for remote damper inspections shall be listed and labeled by a Nationally Recognized Testing Laboratory (NRTL) for such use.

Statement of Problem and Substantiation for Public Input

Substantiation: All dampers, whether smoke or combination dampers, must be UL listed per Section 7.1.1 of NFPA 105. Section 7.3.1.1 states that modifications to the damper shall be in accordance with the damper manufacturer's installation instructions and listing. The current language regarding position indication devices, including those used in remote inspections, does not clearly state that these devices should also be listed to an applicable UL standard, which could cause confusion in the market and pose a serious safety hazard to the public if inferior, untested, and unlisted products are devices to "prove" the performance of such listed devices. The offered proposal would bring these sections into conformance with the language and intent of the other sections of this standard.

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Committee: FDW-AAA

Public Input No. 57-NFPA 105-2025 [Section No. 7.3.1]

7.3.1 Modifications.

7.3.1.1

Any modification made to the damper shall be in accordance with the damper manufacturer's installation instructions and listing.

7.3.1.2

Position indication functionality shall be permitted to be added to an existing damper not originally designed with position indication, ~~provided~~ provided the position indicator is listed and labeled for such use and that the accuracy of the open and closed indication method is confirmed as required by 7.5.2.3.3.

7.3.1.3

Where the modification includes adding the capability for remote inspection, the position indicator devices and monitoring equipment shall be listed and labeled for such use and be tested in accordance with 7.5.2.3.3. ~~1(B).~~

Statement of Problem and Substantiation for Public Input

Substantiation: All dampers, whether smoke or combination dampers, must be UL listed per Section 7.1.1 of NFPA 105. Section 7.3.1.1 states that modifications to the damper shall be in accordance with the damper manufacturer's installation instructions and listing. The current language regarding position indication devices, including those used in remote inspections, does not clearly state that these devices should also be listed to an applicable UL standard, which could cause confusion in the market and pose a serious safety hazard to the public if inferior, untested, and unlisted products are used on listed devices to "prove" the performance of such listed devices. The offered proposal would bring these sections into conformance with the language and intent of the other sections of this standard.

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Committee: FDW-AAA

Public Input No. 43-NFPA 105-2025 [New Section after 7.5.2.3.3.1(C)]

TITLE OF NEW CONTENT

(D) **Each damper shall be visually inspected in accordance with 7.5.2.3.2 one year after the initial remote inspection.**

Statement of Problem and Substantiation for Public Input

The intent of the remote damper inspection provisions was to require a physical inspection at two critical points: during the initial acceptance test and again one year after installation. This approach ensures that the remote damper is physically verified for proper operation both immediately after installation and after one year of service. However, the current language does not clearly convey this intent. The proposed changes are intended to clarify these requirements and align the code with the original intent.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 42-NFPA 105-2025 [Section No. 7.5.2.3.3.1(C)]	
Public Input No. 42-NFPA 105-2025 [Section No. 7.5.2.3.3.1(C)]	

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Submittal Date: Wed May 28 14:06:01 EDT 2025
Committee: FDW-AAA

Public Input No. 42-NFPA 105-2025 [Section No. 7.5.2.3.3.1(C)]

(C)

The initial remote inspection shall include a visual inspection**, performed during acceptance testing,** of the damper in accordance with 7.5.2.3.2.

Statement of Problem and Substantiation for Public Input

The intent of the remote damper inspection provisions was to require a physical inspection at two critical points: during the initial acceptance test and again one year after installation. This approach ensures that the remote damper is physically verified for proper operation both immediately after installation and after one year of service. However, the current language does not clearly convey this intent. The proposed changes are intended to clarify these requirements and align the code with the original intent.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 43-NFPA 105-2025 [New Section after 7.5.2.3.3.1(C)]	
Public Input No. 43-NFPA 105-2025 [New Section after 7.5.2.3.3.1(C)]	

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Public Input No. 46-NFPA 105-2025 [Section No. 7.5.2.5.3]

7.5.2.5.3

Technical justification for inspection, testing, and maintenance intervals shall be documented in writing **and approved by the AHJ** .

Statement of Problem and Substantiation for Public Input

To ensure consistency between NFPA 80 and NFPA 105, the Performance-Based Option for Fire Life Safety Damper inspections must be aligned across both standards. The change to 7.5.2.5.3 matches the language in NFPA 80, Section 20.3.4.4.3. This change will help clarify compliance pathways, reduce confusion for enforcement authorities, and support uniform application in the field.

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Public Input No. 47-NFPA 105-2025 [New Section after 7.6.6]

7.6.7

Field repair of individual components for damper assemblies shall be done in accordance with section 7.6.3 utilizing equal or better components. Repairs should be made by a qualified person and upon completion, documented in accordance with section 7.6.6.

Statement of Problem and Substantiation for Public Input

Currently there is no clarification or definition for the field repair of components within the damper assembly and a failure of one of these should not require, nor result in, a completely new installation. Every day, we are asked by contractors, designers, and facility managers if they are allowed to replace a failed actuator and if we can provide wording to clarify for the AHJ. This often occurs when there is nothing wrong with the damper itself but a failure in one of the other components in the damper assembly has occurred. To be clear this is not a modification to a new installation or the damper itself but rather a maintenance task. An example would be conversion from pneumatic to electric actuation when the damper or actuator manufacturer no longer exists, in this example, the user would be required to install an entirely new assembly. At this time there is only one clear statement that mentions a change to a component of the assembly is possible and it is found in the UL Marking and Application Guide under chapter 5. Section D, specifically: As such, field mounting or substitution of actuators is not covered within the scope of the UL certification of the product. However, this does not necessarily preclude replacement of actuators in the field (full section below for reference).

D. DAMPER ACTUATORS
Smoke dampers, corridor dampers, and combination fire-smoke dampers are equipped with factory installed electric or pneumatic actuators which can be controlled remotely to
open and close the damper blades. The airflow and pressure ratings marked on the dampers are dependent upon the particular combination of damper type, actuator type and
linkages between the damper blades and actuator. As such, field mounting or substitution of actuators is not covered within the scope of the UL certification of the product.
However, this does not necessarily preclude replacement of actuators in the field.

Like any appliance, field servicing of these products is not covered under the scope of the UL certification program. As with any part of the damper, it is expected that replacement
of actuators in the field be done in accordance with the damper manufacturer's normal field servicing program.

We would like to offer that this is not enough to guide someone to the correct and obvious result which is that an in-operable damper must be repaired without delay (7.6.3 / 20.3.5.3).

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Submittal Date: Thu May 29 15:59:42 EDT 2025
Committee: FDW-AAA

Public Input No. 32-NFPA 105-2025 [Section No. A.4.4]

A.4.4

It should be noted that it's common industry practice for manufacturers of fire-rated swinging doors to include the "S-Mark" on the majority of their fire door labels. Gasketing of labeled swinging fire doors is necessary when the doors are located in openings where the codes require them to comply with the testing conditions of UL 1784 and it's specified in their listing(s). While gasketing of labeled swinging fire doors might provide optimal protection, codes do not require it when these doors are not installed in openings requiring smoke-leakage-rated and/or Smoke & Draft Control doors. Typically, non-fire-rated swinging smoke-leakage-rated labeled doors are only installed in UL 1784-compliant openings and should include gasketing materials as required by their lisitng(s).

Non-fire-rated smoke doors might not be marked with an "S" label or any other markings that indicate the maximum air leakage rate. Gasketing manufacturers might be able to provide anecdotal information based on the testing of their products. Due to the size, shape, material, and configuration of gasketing products, the label frequently is marked on the packaging of the gasketing material rather than on the product. Verifying the maximum air leakage rate of a smoke door without a fire protection rating might require additional research if the door does not carry an "S" label.

Statement of Problem and Substantiation for Public Input

The proposed addition to the annex commentary alerts users that gasketing materials to the fact that labels on many of today's swinging fire doors include the S-Mark, but that gasketing materials are only needed when such labeled doors are installed in openings where the codes require them to be smoke-leakage-rated and/or Smoke & Draft Control doors.

This clarification should help to alleviate fire door inspectors from erroneously citing missing gasketing materials as deficiencies based solely on the labels bearing the S-mark.

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Committee: FDW-AAA

Public Input No. 29-NFPA 105-2025 [Section No. A.5.2.4]

A.5.2.4

Acceptance testing of each smoke-leakage-rated door assembly documents that they are properly installed and adjusted to ensure that they more likely to perform as designed and tested. Acceptance testing of new assemblies should be conducted upon completion of installation, and before the owner takes possession.Thereafter, acceptance testing of these assemblies should be periodically conducted upon completion of maintenance affecting their operation to verify they are in a constant state of readiness. In cases where existing smoke-leakage-rated door assemblies don't have acceptance testing records, these records can be created after periodic inspection and testing records show them to be compliant with their respective requirements. After which, their acceptance testing records are periodically updated in the same manner as acceptance testing records of new door assemblies.

The point-by-point visual inspection and subsequent operational testing is the same for acceptance testing and periodic inspection and testing purposes, only the timing and records-keeping provisions are different.

Visual inspection and functional testing of smoke door assemblies require the persons performing the inspections and testing to be thoroughly knowledgeable of the various components and systems that are used to create the assemblies. Inspectors of swinging doors should be able to recognize which components can or cannot be used on specific assemblies, which requires training and experience on the part of the persons performing the inspections. Additionally, AHJs should be able to rely on the competency, expertise, experience, and knowledge of the smoke door inspectors in their jurisdiction.

Statement of Problem and Substantiation for Public Input

The proposed new annex comments explain the differences between acceptance testing and periodic inspection and testing processes and reccommend how acceptance testing records can be created for older existing assemblies that weren't subjected to acceptance testing procedures originally.

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Submittal Date: Fri Jan 31 08:47:42 EST 2025
Committee: FDW-AAA

Public Input No. 35-NFPA 105-2025 [Section No. A.6.3]

A.6.3

Non-fire-rated doors used as smoke-leakage-rated doors in door openings ~~that are~~ not ~~required to be protected by fire doors might be~~ requiring fire ratings might be constructed of aluminum, fiberglass, hollow metal, steel, wood, or other suitable materials. ~~Generally, non-fire-rated smoke door assemblies are required to~~ Codes require these doors to be self-closing or automatic closing and swing easily and freely, which requires ball bearing or anti-friction bearing hinges or pivots. ~~Smoke door assemblies are required to have positive latching hardware, unless otherwise specifically exempted by the applicable building, fire, or life safety code.~~ Positive latching hardware is also required to ensure non-fire-rated smoke-leakage-rated doors remain closed when exposed to increased positive pressure resulting from accumulated smoke acting against the push-side of doors.

Statement of Problem and Substantiation for Public Input

As written, the last statement in A.6.3 creates the misconnception that the codes (e.g., NFPA 101, NFPA 5000, IBC, etc.) contain provisions exempting positve latching hardware on certain swinging smoke-leakage-doors, when that is not the case. Positive latching hardware is essential to the doors' abilities to effective restrict the passage around and under swinging smoke-leakage-rated doors; UL 1784 testing requires the doors to remain closed throughout the exposure to hot, warm, and cold smoke.

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Committee: FDW-AAA

Public Input No. 41-NFPA 105-2025 [Section No. A.7.5.2.2.3]

A.7.5.2.2.3

In existing buildings, it is recognized that fire life safety dampers might have become inaccessible for various reasons. Inaccessible dampers are those that have physical barriers or limitations where one cannot perform the required inspections or tests. The use of the term *inaccessible* is meant to convey that there is a significant physical or structural impediment(s) to complying with the code due to existing construction features, topography, or other existing constraints that would make testing the single damper technically infeasible. However, dampers that pose a significant risk to the performance of the system or the building occupants should not be omitted from periodic testing due to inaccessibility. Claiming a damper is inaccessible without documentation that the inaccessible damper will not pose a significant risk to the performance of the system and technical justification for the designation would not be justification for an AHJ to grant an exemption for a single damper. Maintenance should still be required per NFPA 80 ~~Section 19~~ Section 20 .~~6~~ 3 .5.

Statement of Problem and Substantiation for Public Input

The 2019 edition of NFPA 80 had maintenance under 19.6, but now the section is at 20.3.5 in the current edition.

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Committee: FDW-AAA

Public Input No. 44-NFPA 105-2025 [Section No. A.7.5.2.2.3]

A.7.5.2.2.3

In existing buildings, it is recognized that fire life safety dampers might have become inaccessible for various reasons. Inaccessible dampers are those that have physical barriers or limitations where one cannot perform the required inspections or tests. The use of the term *inaccessible* is meant to convey that there is a significant physical or structural impediment(s) to complying with the code due to existing construction features, topography, or other existing constraints that would make testing the single damper technically infeasible. However, dampers that pose a significant risk to the performance of the system or the building occupants should not be omitted from periodic testing due to inaccessibility. Claiming a damper is inaccessible without documentation that the inaccessible damper will not pose a significant risk to the performance of the system and technical justification for the designation would not be justification for an AHJ to grant an exemption for a single damper. Maintenance should still be required per NFPA 80 ~~Section 19.~~ Section **20.3.5 and NFPA 105 Section 7. 6** .

Statement of Problem and Substantiation for Public Input

NFPA 80 Section 19 refers to glass block assemblies, which is not relevant to the maintenance of fire/smoke dampers. Further, subsection 19.6 does not exist in NFPA 80-2024.
The correct section regarding maintenance of fire/smoke dampers is 20.3.5 in NFPA 80-2024 and 7.6 in NFPA 105-2024.

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Public Input No. 52-NFPA 105-2025 [Section No. C.1.2.5]

C.1.2.5 UL Publications.

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

UL 1784, *Air Leakage Tests of Door Assemblies*, 2015, revised ~~2020~~ 2025 .

Statement of Problem and Substantiation for Public Input

Update of UL references to the document.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 49-NFPA 105-2025 [Section No. 2.3.3]	

Submitter Information Verification

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Submittal Date: Sat May 31 17:45:02 EDT 2025
Committee: FDW-AAA

Public Input No. 2-NFPA 80-2024 [Global Input]

Reference: 3.3.131 and A.5.2.4.2

TIA 22-1

(SC 24-12-7 / TIA Log #1801)

Pursuant to Section 5 of the NFPA *Regulations Governing the Development of NFPA Standards*, the National Fire Protection Association has issued the following Tentative Interim Amendment to NFPA 80, *Standard for Fire Doors and Other Opening Protectives*, 2022 edition. The TIA was processed by the Technical Committee on Fire Doors and Windows and was issued by the Standards Council on December 4, 2024, with an effective date of December 24, 2024.

1. Revise paragraph 3.3.131 to read as follows:

3.3.131 Trained Rolling Steel Fire Door Systems Technician.A technician with documented training and who is qualified through experience with the inspection, testing, and maintenance of rolling steel fire doors. *(See A.5.2.4.2.)* ~~employed in the rolling steel fire door industry with documented training by a recognized industry organization or by a manufacturer of a listed rolling steel fire door.~~

2. Revise Annex paragraph A.5.2.4.2 to read as follows:

A.5.2.4.2 Rolling steel fire doors are unique with respect to other fire door types because of the wide variety and complexity of tension release and automatic closing systems ~~of these doors~~ as opposed to other types of doors ~~that typically open and close as entire units~~. Special training for acceptance testing and periodic inspection and testing is ~~necessary~~ critical because of the multitude of components involved that must work together for the door to be tested and reset correctly. ~~It is essential that the rolling steel fire door industry maintain oversight of any person involved in periodic inspection and testing of such products.~~ When requested by the AHJ, ~~such a person~~ a technician should be able to produce documented evidence of training and experience. ~~Recognized industry organizations and manufacturers of listed rolling steel fire doors with appropriate training materials and programs are viable options for training individuals about the proper performance of rolling steel fire doors and their applicable codes and standards. Periodic inspection and testing should be documented on a form that complies with industry standards. The door should be provided with an inspection mark that complies with industry standards indicating when it was last inspected and tested and refers to the inspection and test form for additional information.~~

Training and experience should include inspection, testing, maintenance, and safety procedures for the doors to avoid the hazards involved and to ensure the doors perform their intended function.

Manufacturers or vendors of listed rolling steel fire doors, and other organizations, including in-house resources, with appropriate training materials and programs acceptable to the AHJ are viable options for training individuals on the proper performance of rolling steel fire doors and the applicable codes and standards.

Additional Proposed Changes

File Name	Description	Approved
Issued_TIA_80-22-1_Final_-_TIA_1801.pdf	NFPA 80 TIA 22-1 Log No. 1801	

Statement of Problem and Substantiation for Public Input

NOTE: This public input originates from Tentative Interim Amendment No. 22-1 (Log 1801) issued by the Standards Council on 12/04/24 and per the NFPA Regs., needs to be reconsidered by the Technical Committee for the next edition of the Document.

Substantiation: An appeal to TIA #1762 was made to the standards council that met in Austin, TX on April 17, 2024 and made a decision to deny the appeal on April 18, 2024. Per the direction of the council, the technical committee was directed to review the definition and related annex to consider whether a TIA may be appropriate to submit for processing on the 2022 and/or 2025 editions of NFPA 80. A special technical committee meeting was called and a motion made and passed to create a new definition and to review/revise the annex information on both editions and to submit a TIA. A task force was established to create verbiage that met the intent of the committee and the Manual of Style requirements. A new definition was created for 3.3.131 for both. This modified language satisfied the concerns from the health care industry, the overhead door industry and others.

Emergency Nature: The standard contains an error or an omission that was overlooked during the regular revision process. The proposed TIA intends to offer to the public a benefit that would lessen a recognized (known) hazard or ameliorate a continuing dangerous condition or situation.

This TIA was developed in response to an appeal to the Standards Council that resulted in the Council requesting for the TC to review the definitions and consider if a TIA was needed. Potential concerns were presented to the committee relating to the original language.

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Submittal Date: Fri Dec 13 14:28:54 EST 2024
Committee: FDW-AAA

Tentative Interim Amendment

NFPA® 80

Standard for Fire Doors and Other Opening Protectives

2022 Edition

Reference: 3.3.131 and A.5.2.4.2
TIA 22-1
(SC 24-12-7 / TIA Log #1801)

Pursuant to Section 5 of the NFPA *Regulations Governing the Development of NFPA Standards*, the National Fire Protection Association has issued the following Tentative Interim Amendment to NFPA 80, *Standard for Fire Doors and Other Opening Protectives*, 2022 edition. The TIA was processed by the Technical Committee on Fire Doors and Windows and was issued by the Standards Council on December 4, 2024, with an effective date of December 24, 2024.

1. Revise paragraph 3.3.131 to read as follows:

3.3.131 Trained Rolling Steel Fire Door Systems Technician. A technician with documented training and who is qualified through experience with the inspection, testing, and maintenance of rolling steel fire doors. *(See A.5.2.4.2.)* ~~employed in the rolling steel fire door industry with documented training by a recognized industry organization or by a manufacturer of a listed rolling steel fire door.~~

2. Revise Annex paragraph A.5.2.4.2 to read as follows:

A.5.2.4.2 Rolling steel fire doors are unique with respect to other fire door types because of the wide variety and complexity of tension release and automatic closing systems ~~of these doors~~ as opposed to other types of doors ~~that typically open and close as entire units~~. Special training for acceptance testing and periodic inspection and testing is ~~necessary~~ critical because of the multitude of components involved that must work together for the door to be tested and reset correctly. ~~It is essential that the rolling steel fire door industry maintain oversight of any person involved in periodic inspection and testing of such products.~~ When requested by the AHJ, ~~such a person~~ a technician should be able to produce documented evidence of training and experience. ~~Recognized industry organizations and manufacturers of listed rolling steel fire doors with appropriate training materials and programs are viable options for training individuals about the proper performance of rolling steel fire doors and their applicable codes and standards. Periodic inspection and testing should be documented on a form that complies with industry standards. The door should be provided with an inspection mark that complies with industry standards indicating when it was last inspected and tested and refers to the inspection and test form for additional information.~~

Training and experience should include inspection, testing, maintenance, and safety procedures for the doors to avoid the hazards involved and to ensure the doors perform their intended function.

Manufacturers or vendors of listed rolling steel fire doors, and other organizations, including in-house resources, with appropriate training materials and programs acceptable to the AHJ are viable options for training individuals on the proper performance of rolling steel fire doors and the applicable codes and standards.

Issue Date: December 4, 2024
Effective Date: December 24, 2024

Public Input No. 3-NFPA 80-2024 [Global Input]

Reference: 3.3.131(new) and A.5.2.4.2

TIA 25-1

(SC 24-12-8 / TIA Log #1802)

Pursuant to Section 5 of the NFPA *Regulations Governing the Development of NFPA Standards*, the National Fire Protection Association has issued the following Tentative Interim Amendment to NFPA 80, *Standard for Fire Doors and Other Opening Protectives*, 2025 edition. The TIA was processed by the Technical Committee on Fire Doors and Windows and was issued by the Standards Council on December 4, 2024, with an effective date of December 24, 2024.

1. Add a new paragraph 3.3.131 to read as follows and renumber following paragraphs:

3.3.130 Track Brackets (Sliding Doors).

3.3.131 Trained Rolling Steel Fire Door Systems Technician.A technician with documented training and who is qualified through experience with the inspection, testing, and maintenance of rolling steel fire doors. *(See A.5.2.4.2.)*

3.3.132~~131~~ Transom.

2. Revise Annex paragraph A.5.2.4.2 to read as follows:

A.5.2.4.2 Rolling steel fire doors are unique with respect to other fire door types because of the wide variety and complexity of tension release and automatic closing systems ~~of these doors~~ as opposed to other types of doors ~~that typically open and close as entire units~~. Special training for acceptance testing and periodic inspection and testing is ~~necessary~~ critical because of the multitude of components involved that must work together for the door to be tested and reset correctly. ~~It is essential that the rolling steel fire door industry maintain oversight of any person involved in periodic inspection and testing of such products.~~ When requested by the AHJ, ~~such a person~~ a technician should be able to produce documented evidence of training and experience. ~~Recognized industry organizations and manufacturers of listed rolling steel fire doors with appropriate training materials and programs are viable options for training individuals about the proper performance of rolling steel fire doors and their applicable codes and standards. Periodic inspection and testing should be documented on a form that complies with industry standards. The door should be provided with an inspection mark that complies with industry standards indicating when it was last inspected and tested and refers to the inspection and test form for additional information.~~

Training and experience should include inspection, testing, maintenance, and safety procedures for the doors to avoid the hazards involved and to ensure the doors perform their intended function.

Manufacturers or vendors of listed rolling steel fire doors, and other organizations, including in-house resources, with appropriate training materials and programs acceptable to the AHJ are viable options for training individuals on the proper performance of rolling steel fire doors and the applicable codes and standards.

Additional Proposed Changes

File Name	Description	Approved

Issued_TIA_80-25-1_Final_-_TIA_1802.pdf NFPA 80 TIA 25-1 Log No. 1802

Statement of Problem and Substantiation for Public Input

NOTE: This public input originates from Tentative Interim Amendment No. 25-1 (Log 1802) issued by the Standards Council on 12/04/24 and per the NFPA Regs., needs to be reconsidered by the Technical Committee for the next edition of the Document.

Substantiation: An appeal to TIA #1762 was made to the standards council that met in Austin, TX on April 17, 2024 and made a decision to deny the appeal on April 18, 2024. Per the direction of the council, the technical committee was directed to review the definition and related annex to consider whether a TIA may be appropriate to submit for processing on the 2022 and/or 2025 editions of NFPA 80. A special technical committee meeting was called and a motion made and passed to create a new definition and to review/revise the annex information on both editions and to submit a TIA. A task force was established to create verbiage that met the intent of the committee and the Manual of Style requirements. A new definition was created for 3.3.131 for both. This modified language satisfied the concerns from the health care industry, the overhead door industry and others.

Emergency Nature: The standard contains an error or an omission that was overlooked during the regular revision process. The proposed TIA intends to offer to the public a benefit that would lessen a recognized (known) hazard or ameliorate a continuing dangerous condition or situation.

This TIA was developed in response to an appeal to the Standards Council that resulted in the Council requesting for the TC to review the definitions and consider if a TIA was needed. Potential concerns were presented to the committee relating to the original language.

Submitter Information Verification

Submitter Full Name: NFPA TIA
Organization: TIA
Street Address:
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Submittal Date: Fri Dec 13 14:59:20 EST 2024
Committee: FDW-AAA

Tentative Interim Amendment

NFPA® 80

Standard for Fire Doors and Other Opening Protectives

2025 Edition

Reference: 3.3.131(new) and A.5.2.4.2
TIA 25-1
(SC 24-12-8 / TIA Log #1802)

Pursuant to Section 5 of the NFPA *Regulations Governing the Development of NFPA Standards*, the National Fire Protection Association has issued the following Tentative Interim Amendment to NFPA 80, *Standard for Fire Doors and Other Opening Protectives*, 2025 edition. The TIA was processed by the Technical Committee on Fire Doors and Windows and was issued by the Standards Council on December 4, 2024, with an effective date of December 24, 2024.

1. Add a new paragraph 3.3.131 to read as follows and renumber following paragraphs:

3.3.130 Track Brackets (Sliding Doors).

3.3.131 Trained Rolling Steel Fire Door Systems Technician. A technician with documented training and who is qualified through experience with the inspection, testing, and maintenance of rolling steel fire doors. *(See A.5.2.4.2.)*

3.3.132~~131~~ Transom.

2. Revise Annex paragraph A.5.2.4.2 to read as follows:

A.5.2.4.2 Rolling steel fire doors are unique with respect to other fire door types because of the wide variety and complexity of tension release and automatic closing systems ~~of these doors~~ as opposed to other types of doors ~~that typically open and close as entire units~~. Special training for acceptance testing and periodic inspection and testing is ~~necessary~~ critical because of the multitude of components involved that must work together for the door to be tested and reset correctly. ~~It is essential that the rolling steel fire door industry maintain oversight of any person involved in periodic inspection and testing of such products.~~ When requested by the AHJ, ~~such a person~~ a technician should be able to produce documented evidence of training and experience. ~~Recognized industry organizations and manufacturers of listed rolling steel fire doors with appropriate training materials and programs are viable options for training individuals about the proper performance of rolling steel fire doors and their applicable codes and standards. Periodic inspection and testing should be documented on a form that complies with industry standards. The door should be provided with an inspection mark that complies with industry standards indicating when it was last inspected and tested and refers to the inspection and test form for additional information.~~

Training and experience should include inspection, testing, maintenance, and safety procedures for the doors to avoid the hazards involved and to ensure the doors perform their intended function.

Manufacturers or vendors of listed rolling steel fire doors, and other organizations, including in-house resources, with appropriate training materials and programs acceptable to the AHJ are viable options for training individuals on the proper performance of rolling steel fire doors and the applicable codes and standards.

Issue Date: December 4, 2024
Effective Date: December 24, 2024

Public Input No. 14-NFPA 80-2025 [Section No. 1.1 [Excluding any Sub-Sections]]

This standard regulates the installation~~ and~~ , inspection, testing, and maintenance of assemblies and devices used to protect openings in walls, floors, and ceilings against the spread of fire and smoke within, into, or out of buildings.

Statement of Problem and Substantiation for Public Input

Since the 2007 edition, NFPA 80's purpose formally requires ongoing inspection and testing of opening protectives. Adding inspection and testing to NFPA 80's scope appropriately documents its current applications.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 15-NFPA 80-2025 [Section No. 1.2.1]	

Submitter Information Verification

Submitter Full Name: Keith Pardoe
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Submittal Date: Mon Mar 10 11:23:33 EDT 2025
Committee: FDW-AAA

Public Input No. 15-NFPA 80-2025 [Section No. 1.2.1]

1.2.1

The purpose of this document is to set national standards for the installation, inspection, testing, and maintenance of assemblies used to protect openings in walls, floors, and ceilings to prevent or retard the spread of fire and smoke within, into, or out of buildings.

Statement of Problem and Substantiation for Public Input

Adding the words inspection and testing to NFPA 80's purpose statement informs users that inspection and testing of fire-rated protectives is critical to NFPA 80's enforceable requirements and provisions.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 14-NFPA 80-2025 [Section No. 1.1 [Excluding any Sub-Sections]]	

Submitter Information Verification

Submitter Full Name: Keith Pardoe
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Submittal Date: Mon Mar 10 11:28:26 EDT 2025
Committee: FDW-AAA

Public Input No. 32-NFPA 80-2025 [New Section after 1.5]

Section 1.6 Conflicts

1.6.1 Where a specific requirement contained in Chapters 6 through 17 conflicts with a general requirement contained in Chapters 4 and 5, the requirement of Chapters 6 through 17 shall govern.

1.6.2 Where a requirement contained in Chapters 6 through 17 conflict with another requirement within the same chapter, the more stringent requirement shall govern.

Statement of Problem and Substantiation for Public Input

The proposal seeks to provide users with guideance as to resolving conflicting provisions and requirements that might arise in NFPA 80.

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Submittal Date: Thu Mar 13 10:14:14 EDT 2025
Committee: FDW-AAA

Public Input No. 38-NFPA 80-2025 [Section No. 1.5]

1.5 Equivalency.

1.5.1*

~~This standard shall not prohibit the development of new, modified, or improved devices that meet the intent of these requirements.~~

~~**1.5.2**~~ –

~~It shall be the responsibility of the manufacturer to furnish the information necessary to update the requirements pertaining to such new and improved devices.~~

Nothing in this standard is intended to prevent the use of assemblies, components, devices, and systems of equivalent or superior quality, strength, fire ratings, effectiveness, durability, and safety over those prescribed by this standard.

1.5.3

For devices not described in this standard, the AHJ shall request descriptive information from

~~manufacturers~~

the manufacturer(s) that is provided by a testing laboratory concerning acceptable methods for satisfactory field installation based on fire tests and engineering

~~studies~~

evaluations for operation and maintenance considerations, where applicable.

Statement of Problem and Substantiation for Public Input

The proposed new langauge is adapted from section 1.4, Equivalency, in NFPA 101-2024; it clarifies that new solutions meeting or exceeding NFPA 80's minimum requirements is explicitly permitted. Existing 1.5.1 "allows" for the development of new solutions, but does not permit their use—albeit, it's implied. The existing Annex A content at A.1.5.1 can remain unchanged as it applies to the proposed new language in 1.5.1.

As it is written, existing 1.5.2 is unenforceable due to its ambiguity; to whom are the manufacturers required to "...provide the requirements pertaining to such new and improved devices," and when? One interpretation is that the manufacturers are required to provide their information to the NFPA technical committee for inclusion into future editions; that's not how the NFPA code and standard development process works. Another interpretion is that the manufacturers are required to provide their information to the appropriate AHJs; that's covered (and better) in 1.5.3.

Submitter Information Verification

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Submittal Date: Thu May 01 10:22:18 EDT 2025
Committee: FDW-AAA

Public Input No. 58-NFPA 80-2025 [Section No. 2.3.1]

2.3.1 ASME Publications.

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

ASME A17.1/CSA B44, *Safety Code for Elevators and Escalators*, ~~2019~~ 2025 .

Statement of Problem and Substantiation for Public Input

Update to the latest edition of a referenced standard to ensure alignment.

Submitter Information Verification

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Submittal Date: Mon Jun 02 10:34:59 EDT 2025
Committee: FDW-AAA

Public Input No. 64-NFPA 80-2025 [Section No. 2.3.3]

2.3.3 BHMA Publications.

Builders Hardware Manufacturers Association, ~~355 Lexington Avenue, 15th Floor, New York, NY 10017.~~ 529 14th Street, NW, Suite 1280 Washington, DC 20045 USA

ANSI/BHMA A156.1, *Standard for Butts and Hinges*, 2021.

ANSI/BHMA A156.3 *Standard for Exit Devices*, 2020 .

ANSI/BHMA A156. 4, *Standard for Door Control-Closers*, ~~2019~~ 2024 .

ANSI/BHMA A156.17, *Standard for Self Closing Hinges & Pivots*, ~~2019~~ 2025 .

ANSI/BHMA A156.26, *Standard for Continuous Hinges*, 2021.

Statement of Problem and Substantiation for Public Input

Updating Standard dates to reflect current editions, as well as inclusion of an additional ANSI Standard cited in PI 72

Submitter Information Verification

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Submittal Date: Tue Jun 03 16:53:49 EDT 2025
Committee: FDW-AAA

Public Input No. 53-NFPA 80-2025 [Section No. 2.3.6]

2.3.6 UL Publications.

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

UL 9, *Fire Tests of Window Assemblies*, 2009, revised ~~2020~~ 2024 .

UL 10A, *Tin-Clad Fire Doors*, 2009, revised 2022.

UL 10B, *Fire Tests of Door Assemblies,* 2008, revised ~~2020~~ 2024 .

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

UL 10D, *Fire Tests of Fire-Protective Curtain Assemblies*, revised 2022.

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

~~UL 33~~ CAN/UL/ULC 33 , *Heat Responsive Links for Fire-Protection Service*, 2021, revised 2022.

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

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

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

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

UL 555S, *Smoke Dampers*, 2014, revised 2020.

UL 864, *Control Units and Accessories for Fire Alarm Systems*, ~~2014~~ 2023 , revised ~~2020~~ 2024 .

Statement of Problem and Substantiation for Public Input

Update of UL references to the document and add Bi National designations where applicable.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 57-NFPA 80-2025 [Section No. L.1.2.6]	

Submitter Information Verification

Submitter Full Name: Kelly Nicolello
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Submittal Date: Sat May 31 17:24:50 EDT 2025
Committee: FDW-AAA

Public Input No. 65-NFPA 80-2025 [Section No. 2.3.6]

2.3.6 UL Publications.

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

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

UL 10A, *Tin-Clad Fire Doors*, 2009, revised 2022.

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

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

UL 10D, *Fire Tests of Fire-Protective Curtain Assemblies*, revised 2022.

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

UL 33, *Heat Responsive Links for Fire-Protection Service*, 2021, revised 2022.

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

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

UL 305 *Panic Hardware, Edition 6, revised 2022*

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

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

UL 555S, *Smoke Dampers*, 2014, revised 2020.

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

Statement of Problem and Substantiation for Public Input

Addition of UL 305, Standard for Exit Devices, as cited in PI 72

Submitter Information Verification

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Submittal Date: Tue Jun 03 16:58:33 EDT 2025
Committee: FDW-AAA

Public Input No. 67-NFPA 80-2025 [New Section after 3.3.16]

3.3.XX Builders Hardware

Labeled or listed products used on fire doors, including fire exit devices, hinges, single-, two-, or three-point locks and latches, top and bottom bolts and door closers.

Statement of Problem and Substantiation for Public Input

The current text of 4.6.3 and 4.6.4.1 partially defines 'builders hardware' and as such it should be a defined term in Chapter 3 instead of in Chapter 4 General Requirements.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 68-NFPA 80-2025 [Section No. 4.6.3]	
Public Input No. 69-NFPA 80-2025 [Section No. 4.6.4.1]	

Submitter Information Verification

Submitter Full Name: Kurt Roeper
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Submittal Date: Wed Jun 04 14:28:52 EDT 2025
Committee: FDW-AAA

Public Input No. 12-NFPA 80-2025 [New Section after 3.3.28]

<<New Definition>>

Constant State of Readiness: Fire-rated protective opening assemblies and systems are expected to perform their primary function, which is to contain a fire. While some opening protectives provide other functions under daily conditions, codes require all opening protectives to be ready to contain a fire at any time. Opening protectives require ongoing inspection, testing, and maintenance throughout their service lives to ensure they are ready to provide their intended protection.

Statement of Problem and Substantiation for Public Input

The propoised new definition acknowledges that all fire-rated opening protectives are expected to function properly at all times; they must be ready to contain a fire at any time. While this concept has been implied in NFPA 80 and other codes, this new definition emphasizes its importance.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 11-NFPA 80-2025 [Section No. 5.1.2.1]	Defines the term "Constant Stare of Readiness" used in 5.1.2.1.

Submitter Information Verification

Submitter Full Name: Keith Pardoe
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Submittal Date: Mon Mar 10 10:19:19 EDT 2025
Committee: FDW-AAA

Public Input No. 52-NFPA 80-2025 [Section No. 3.3.99]

3.3.99 Qualified Person.

A person who, by possession of a recognized degree, certificate, professional standing, or skill, and who, by knowledge, training, and experience, has demonstrated the ability to deal with the subject matter, the work, or the project**, as acceptable to the AHJ** .

Statement of Problem and Substantiation for Public Input

The addition of the phrase “as acceptable to the AHJ” ensures that enforceable minimum qualifications can be established while preserving the AHJ’s authority to consider regional licensing, certification, or competency programs that meet the intent of the standard. This approach balances national consistency with local flexibility, ultimately improving safety, compliance, and clarity for all stakeholders involved.

Submitter Information Verification

Submitter Full Name: Christopher Ruch
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Submittal Date: Fri May 30 17:08:25 EDT 2025
Committee: FDW-AAA

Public Input No. 54-NFPA 80-2025 [Section No. 3.3.100]

3.3.100 Retrofit Operator.

A device labeled as a “retrofit rolling steel fire door operator” intended to replace operator and governor systems (including automatic-closing devices) used on existing listed rolling steel fire doors.

New

3.3.100* Reclaimed Fire Rated Assembly.

An existing fire rated assembly, or any portion thereof, that was formerly installed in the field now intended for reuse or repurposing and reinstallation as an alternative to newly manufactured fire rated opening protective products.

A.3.3.100

As a sustainability policy initiative intended to reduce opening protective assemblies or components removed from buildings undergoing demolition from becoming landfill waste, opening protective assemblies or components may be proposed for reuse and reinstallation. As life-safety products, reclaimed fire rated assemblies or components should be properly reconditioned, inspected, and tested, as appropriate for their intended function.

Statement of Problem and Substantiation for Public Input

This proposal aims to create language to limit the use of reclaimed materials for use in fire rated opening protectives. It is understood that there may be efforts to reduce waste and promote sustainable solutions by means of reusing products such as fire doors and their components. However, there are no guidelines to permit a process of using reclaimed materials, while ensuring the fire rated opening will maintain the intended fire protection performance. Fire rated openings consist of multiple listed products such as doors, frames, hardware, and glazing where the combination is critical to create a compliant opening.

Additionally, fire doors commonly function as a normal mode of egress for day-to-day operation, where the normal to high levels of wear and tear will exist. Following the guidelines of NFPA 80, an installation involving a reclaimed fire door would only be subjected to the installation requirements of a new fire door, not accounting for any unseen damage or progression of modifications throughout the former life of the reclaimed fire door.

There are more examples and speculation that can be raised, but ultimately, the intention is to ensure that NFPA 80 includes language to limit the use of reclaimed products in an uncontrolled and, potentially, noncompliant manner. The building codes rely on the use of listed products for the protection of openings in fire rated assemblies and using reclaimed materials in an uncontrolled way potentially removes traceability of the origin of a product, affecting the integrity of labeled products and the product certifications.

Lastly, this proposal can benefit from the technical expertise of the committee, and it is understood that this current proposal may not fully address the concerns associated with the use of reclaimed materials. A task group or some other effort to expand the conversation on this topic may be something for the committee to consider.

Submitter Information Verification

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Submittal Date: Sat May 31 17:28:22 EDT 2025
Committee: FDW-AAA

Public Input No. 66-NFPA 80-2025 [Section No. 4.1.6]

4.1.6 * Signage Materials .

~~Signage~~ Where permitted by Chapters 6 through 17, signage materials shall be permitted to be ~~installed on the surfaces of fire~~ applied to the faces of doors in accordance with 4.1.6.1 through 4.1.6.4 or in accordance with the ~~door manufacturer's listing~~ listings of the doors .

4.1.6.1* Allowable Area.

~~The~~ Unless otherwise permitted by Chapters 6 through 17, the total area of all signage materials applied to doors shall comply with the following:

(1) ~~Combustible materials shall~~ Signage materials applied more than 38 inches (965 mm) above the floor shall not exceed 5 percent of the area of ~~the~~ each face of the ~~fire~~ door.

(2) ~~Painted stencils or other similar methods shall not be limited in area.~~
~~Polymetric materials up to 0.008 in. (0.2 mm) in thickness shall not exceed 5 percent~~

(3)

(a) Signage materials applied to doors complying with Chapter 6 having ratings greater than 1/3 hour shall not exceed 15 percent of the area of

~~the face~~

(4)

(a) each face of the

~~fire~~

(5)

(a) door.

(6) ~~Metal materials up to 0.04 in. (1 mm) thickness shall not exceed 200 in.^{2} (0.13 m^2).~~

(7)

(a) Signage materials applied not more than 38 inches (965 mm) above the floor shall not be limited in area.

(b) In lieu of the requirements specified in 4.1.6.2.1 and 4.1.6.2.2, signage materials applied not more than 38 inches (965 mm) above the floor shall be permitted to be attached by adhesives or steel screws

(8) * Singage materials applied to temperature rise-rated doors complying with Chaper 6 that are rated for 450°F (232°C) or greater shall not be limited in area or placement.

(9) Signage materials applied to 1/3-hr rated doors complying with Chapter 6 shall not be limited in area or placement.

(10) Painted stencils or other similar methods shall not be limited in area or placement.

4.1.6.2 Means of Attachment.

4.1.6.2.1

~~Signage~~ Combustible signage materials shall be attached to ~~fire~~ doors with ~~adhesive~~ adhesives , unless otherwise permitted by 4.1.6.2.3 or the ~~door manufacturer's~~ listing of the doors .

4.1.6.2.2

~~Mechanical attachments such as screws or nails~~ Singnage materials shall not be permitted to be attached by any type of mechanical fastener , unless otherwise permitted by 4.1.6.2.3 or the ~~door manufacturer's listing~~ listing of the doors .

4.1.6.2.3

For ~~hollow metal~~ steel doors and 1~~/~~/ 3 -hour-rated wood doors complying with Chapter 6, and doors ~~, up to four~~ complying with chapters 7, and 8, steel or stainless steel ~~sheet metal~~ screws ~~up to US size #8 (4.2 mm) in diameter or up to four other steel fasteners not exceeding 0.17 in. (4.2 mm)~~ shall be permitted to ~~penetrate one side of a fire door to~~ attach signage materials to doors .

4.1.6.2.4

~~Steel fasteners~~ Screws permitted by 4.1.6.2.3 shall not ~~exceed 0~~ penetrate doors more than 0 .5 in. (~~12.7 mm) in length~~ 13) mm .

4.1.6.3~~–~~ *

Signage materials shall not be ~~installed on~~ applied to fire protection-rated glazing in ~~fire~~ doors, sidelights, transoms, and windows ..

4.1.6.4

Signage materials shall not be ~~installed on the surface of fire doors such that it impairs or otherwise interferes with the proper operation of the fire door.~~ applied to doors in any manner that impairs or otherwise interferes with the door's proper operation.

==========

A.4.1.6 Under fire conditions, radiant heat transferred through the doors to the unexposed faces of the doors might cause combustible signage materials (e.g., card stock, poster board, paper, plastic laminate, and wood) to spontaneously ignite causing fires to spread beyond the fire door assemblies. For this reason, care should be taken when selecting materials for new signage. Prior to the 1995 edition of this standard, signage materials were not regulated. Consequently, signage materials applied to doors installed in accordance with earlier editions of this standard should be exempt from these provisions and limitations, provided the signage materials were applied to the doors before the adoption and enforcement of the 1995 edition of this standard.

A.4.1.6.1 Building, fire, life safety codes and accessibility standards contain requirements and specifications (e.g., minimum character heights and stroke widths) for signage applied to certain fire-rated doors.that might cause the total area of the doors covered by signage to exceed these limitations. For example, codes and standards affecting occupancies having designated hazardous contents of use rooms (e.g., high-voltage electrical vaults, med-gas storage, and radiation hazards) have myriad signage requirements resulting in signage areas exceeding the limitations specified in 4.1.6.1.In these cases, it might be necessary to contact the respective door manufacturer(s) to verify sucn signage would not be detremental to the performace of the affected door(s).Modern codes also contain provisions and requirements for photoluminescent (glow-in-the-dark) exit signs and hardware markings (i.e, 1 inch (25 mm) wide tape for certain fire-rated doors, Typically, photoluminescent exit signs on swinging doors are placed below 38 inches (965 mm) above the floor, which is below the neutral plane of the positive pressure fire door tests conducted in accordance with NFPA 252, Standard Methods of Fire Tests of Door Assemblies and UL 10C, Positive Pressure Fire Tests of Door Assemblies. Accordingly, photoluminescent exit signs should be exempted from the provisions and requirements of Section 4.1.6. Similarly, photoluminescent hardware markings applied more the 38 inches (965 mm) above the floor should not be included included in the signage area calculations.

Doors, other than those complying with Chapter 6, can be very large.For instance, sliding doors complying with Chapter 8 can be as large as 10 feet (3048 mm) wide and 12 feet high (3658 mm); the five (5) percent maximum allowable signage area can be as great as 864 square inches (21946 mm). Similarly. doors complying with chapters 9, 10, 11, and 13 can also be larger than doors complying Chapter 6.

A.4.1.6.1(1)(b) Temperature rise-rated swinging doors complying with Chapter 6 are constructed with core materials designed to retard radiant heat passing through the doors to the unexposed side of the doors during the first 30 minutes of exposure to fire. Codes require new doors protecting interior stairways, ramps, and exit passageways to hae Temperature rise ratings of at least 450°F (232°C) in buildings that are not protected throughout with an automatic sprinkler system. Former codes also required doors in these same locations to be temperature rise-rated.

A.4.1.6.4.3 Codes require power-operated swinging and sliding doors to have "IN EMERGENCY, PUSH TO OPEN" and "IN EMERGENCY, SLIDE TO OPEN" sings, respectively, on the egress faces of the doors. Additionally, swinging power-operated doors also have arrow warning signs (decals) on the pull-sides of the doors alerting pedestrians that the doors swing open toward them. Typically, these signs are decals that are applied to the of doors, and in some cases to fire protection-rated glazing materials. Care should be taken to apply these decals to body of the doors rather than the glazing materials unless the glazing materials are fire resistance-rated.. In addition to the placement of these signs, they should be included in the total signage area calculations.

Statement of Problem and Substantiation for Public Input

NFPA 80's signage provisions have been problematic sinve their inception in Chapter 1 of the 1995 edition of NFPA 80, and they were rendered nearly unenforceable since Chapter 1 (1995) applied to all the door types covered in chapters 6 through 17. The five (5) percent allowable area is subjective to

the maximum door sizes, which vary greatly depending on the door types and irrespective of the hourly fire ratings and internal core materials. Using the 5% limitation, the maximum allowable area for doors complying with Chapter 6 is about 288 sq. in. as compared to 864 sq. in. maximum allowable area for doors complying with Chapter 8. The proposed revisions to the signage limitations and restrictions are scoped to specific types of doors based on certain construction and performance qualities.

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Committee: FDW-AAA

Public Input No. 21-NFPA 80-2025 [Section No. 4.1.6.1]

4.1.6.1 Allowable Area.

The total area of all signage shall comply with the following:

(1) Combustible materials shall not exceed 5 percent of the area of the face of the fire door.

(2) Painted stencils or other similar methods shall not be limited in area.

(3) Polymetric materials up to 0.008 in. (0.2 mm) in thickness shall not exceed 5 percent of the area of the face of the fire door.

(4) Metal materials up to 0.04 in. (1 mm) thickness shall not exceed ~~200 in~~ 288 in.^{2} (0.13 m^2).

Statement of Problem and Substantiation for Public Input

The maximum are of 200 square inches of signage materials is more restrictive than the 5% surface area of the door limitation on certain sizes of Chapter 6-type swinging doors. Most manufacturers can produce Chapter 6 doors up to 4 feet wide and 10 feet high—there are a few limited applications for 5 foot-wide fire doors. 5% of the 4 x 10 doors is 288 sq inches. Since these signage provisions apply to all the doors specified in NFPA 80, option (4) might be too restrictive for larger doors (e.g., Chatpers 7 and 8).

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Public Input No. 20-NFPA 80-2025 [Section No. 4.1.6.2.3]

4.1.6.2.3

For hollow metal doors and ⅓-hour-rated wood doors complying with Chapter 6 , up to four steel or stainless steel sheet metal screws up to US size #8 (4.2 mm) in diameter ~~or up to four other steel fasteners not exceeding 0.17 in. (4.2 mm)~~ shall be ~~permitted to penetrate one side of a fire door to~~ used to attach signage materials to doors .

Statement of Problem and Substantiation for Public Input

As written, 4.1.6.2.3's phrasing is confusing and unnecessairly wordy. Since #8 screws have a diameter of 0.17" (4.2 mm) the latter provisions for "up to four other screws not exceeding 0.17" (4.2 mm)..." creates confusion. it's unclear that the latter reference to 0.17" is referring to the screws' diameters or lengths. Also, there is no technical justification to limit the use of screws to only one side of the doors.

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Public Input No. 73-NFPA 80-2025 [New Section after 4.1.6.4]

Fire-Rated Polyvinyl Door Wraps

4.1.7* Fire-Rated Polyvinyl Door Wraps.

4.1.7.1 Where permitted by Chapters 6 through 17, polyvinyl door wraps shall be permitted in accordance with 4.1.7.1.1 through 4.1.7.1.4.

4.1.7.1.1 Unless prohibited by the door's listing, polyvinyl door wraps shall be permitted to be applied to one or both faces and the vertical edges of the doors.

4.1.7.1.2 Fire door labels applied to the vertical edges of the doors shall remain visible after applying the door wraps.

4.1.7.1.3 Application of polyvinyl wraps shall not impair or otherwise interfere with the door's proper operation.

4.1.7.2 Polyvinyl wraps shall be applied to doors in accordance with their listings and installation instructions.

=========

A.4.1.7 Polyvinyl door wraps can be used to create aesthetically-pleasing graphical enhancements to doors that aren't achievable by other means. Elevator hoistway doors are sometimes decorated with graphic designs approiate to the nature of the buildings. Codes allow certain egress doors in Alzheimer patient care areas to be covered on the egree side by murals to conceal them.

Statement of Problem and Substantiation for Public Input

The proposed new section addresses the ongoing use of fire-rated ploy vinyl wraps used on fire doors. Due to the nature of these wraps, they do not fall under NFPA 80's signage provisions and requirements, and deserve their own section.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 74-NFPA 80-2025 [New Section after 6.4.4.12]	
Public Input No. 75-NFPA 80-2025 [New Section after 14.3.2]	

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Committee: FDW-AAA

Public Input No. 4-NFPA 80-2025 [New Section after 4.2.1]

4.2.1.6* Construction-Labeled Door Frames and Doors.

4.2.1.6.1 Where approved by the AHJ, special-use door frames and doors complying with Chapter 6 bearing construction labels shall be permitted to be used in lieu of labeled components.

4.2.1.6.1 Requests for approving the use of construction-labeled door frames and doors shall comply with Section 1.5.

4.2.1.6.1.2 Labels on construction-labeled door frames and doors shall include statements indicating the components are identical in materials and construction to their fire-rated counterparts, but cannot bear the marks of a testing laboratory due to untested size, hardware preparation(s), glazing area, or other such condition(s).

4.2.1.6.1.3 Labels shall not be required to comply with 4.2.1.1 through 4.2.1.4.3.

4.2.1.6.4* Construction-labeled fire door assemblies shall be installed, inspected, tested, and maintained in accordance with the provisions of this chapter, Chapter 5, and Chapter 6.

4.2.1.6.4.1 Acceptance testing of construction-labeled door assemblies complying with Section 5.2.3 shall be conducted upon installation and maintenance complying with Section 5.5.

4.2.1.6.4.2 Periodic inspection and testing of construction-labeled door assemblies shall be comply with Section 5.2.4.

4.2.1.6.5 Construction-labeled door frames and doors shall not be permitted to be converted into labeled components by the application labels from third-party labeling service providers.

==========

A.4.2.1.6 Swinging fire door assemblies (as specified in Chapter 6) comprised of construction-labeled door frames and doors are a special-use case of opening protectives; they require the AHJs permission prior to their installation. Unlike the provisions in the building codes, past and present, for over-sized fire doors that do not require permission from the AHJs, the codes do not contain provisions for the special use of construction-labeled components. Since these assemblies are installed in locations where the codes require fire protection-rated opening protectives, they are expected to provide the same levels of protection as labeled fire door assemblies. Accordingly, their installation and maintenance should be given the same attention to detail as their properly labeled counterparts.

Section 1.5, Equivalency, contains an option for AHJs to approve alternative products that meet or exceed the specified level(s) of protection. AHJs might have additional documentation requirements and procedures regarding approving special-use applications.

Statement of Problem and Substantiation for Public Input

Manufacturers have producted construction-labeled door frames and doors for several decades. These components are a spcial-use case of swinging doors with builders hardware. Since these doors are used in locations requiring fire protection ratings, construction-labeled assemblies need to be installed, inspected, teeted, and maintained exactly the same as formally-labeled swinging door assemblies. NFPA 80 requires all fire door assemblies to be inspected, tested, and maintained, but it has been silent on the use of construction-labeled door frames and doors. Section 1.5, Equivalency, gives AHJs the option of approviing alternate means of meeting or exceeding the intent of the codes and standards.

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Public Input No. 18-NFPA 80-2025 [Section No. 4.2.1.2]

4.2.1.2*

For ~~swinging~~ doors ~~provided~~ complying with ~~builders hardware~~ Chapter 6 , the minimum latch throw dimension shall also be shown ~~.(See 6.1.~~ on the label.

A. 4.2 . ~~)~~ **1.2** Manufacturers sometimes include both the minimum latch throw dimension and the "FIRE DOOR TO BE EQUIPPED WITH FIRE EXIT HARDWARE" requirement on the same fire door label.

Statement of Problem and Substantiation for Public Input

Commensurate with other recent changes in NFPA 80, this PI specifically scopes the 4.2.1.2's requirement to doors complying with chapter 6. The new annex comment acknowledges that many modern fire door labels include dual requirements for latch throw dimension and FIRE DOOR TO BE EQUIPPED WITH FIRE EXIT HARDWARE. The paranthetical reference to 6.1.4.2 points to the requirement for Fire Door to be Equipped with Fire Door Hardware in chapter 6; it doesn't make any refernce to latch throw of other latching hardware—it should be removed.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 5-NFPA 80-2025 [Section No. 4.2.1.2]	
Public Input No. 5-NFPA 80-2025 [Section No. 4.2.1.2]	

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Public Input No. 5-NFPA 80-2025 [Section No. 4.2.1.2]

4.2.1.2

For swinging doors ~~provided~~ complying with ~~builders hardware~~ Chapter 6 , the minimum latch throw ~~shall also~~ dimension or the requirement for fire exit hardware shall be shown ~~.~~ ~~*(See 6.1.4.2 .)*~~ on labels for doors.

4.2.1.2.1 Labels on new doors shall be permitted to include both the minimum latch throw dimension and fire exit hardware requirements.

Statement of Problem and Substantiation for Public Input

The proposed revisions clarify that the latch throw dimension and fire exit hardware requirements only apply to Chapter 6 doors. Builders hardware components are only used on Chapter 6 doors. The pointer to 6.1.4.2 is unnecessary; it's deletion is not a technical change. The new subsection acknowledges the industry practice of door manufacturers including both the minimum latch throw dimensions and fire exit hardware requirements on modern fire door labels.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 18-NFPA 80-2025 [Section No. 4.2.1.2]	
Public Input No. 18-NFPA 80-2025 [Section No. 4.2.1.2]	

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Public Input No. 19-NFPA 80-2025 [Section No. 4.2.1.4 [Excluding any Sub-Sections]]

The label for fire door frames complying with Chapter 6 shall contain the following information:

(1) The words “fire door frame” or the ~~acronym “FDF”~~ abbreviation“FDF”

(2) The manufacturer’s company name or a code that can be traced back to the manufacturer

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

(4) The fire protection rating of the frame, unless otherwise permitted by 4.2.1.4.1

(5) The fire test standard designation to which it was tested

Statement of Problem and Substantiation for Public Input

As the letters FDF are used in this statement, it's an abbreviation (initialism) not an acronym. Acronyms are abbreviations that form other words (e.g., radar is an acronym for Radio Detecting And Ranging). NFPA 80's use of FDF simply uses the first letter of each word "Fire Door Frame." The labeling requirements specified in 4.1.2.4 are only for door frames coomplying with Chapter 6.

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Public Input No. 24-NFPA 80-2025 [New Section after 4.2.1.5]

<< Insert before existing 4.2.1.5>>

4.2.1.5* For swinging door assemblies complying with Chapter 6, the door frames and doors shall be permitted to have different maximum hourly ratings.

4.2.1.5.1* The maximum hourly rating of an assembly shall be limited to the rating of its lowest-rated component.

4.2.1.5.2* The hourly ratings of the assemblies shall only be considered valid when all required components are installed in accordance with their listing(s) and installation instructions, and the opening functions correctly as required by other codes.

==========

A.4.2.1.5 Door frame components of Chapter 6-type swinging door assemblies are available in several materials including, but not limited to, 18, 16, and 14 gauge hollow metal (aka steel)—with 16 gauge being the most common thickness—18 and 20 gauge prefinished steel with snap-on trim, wood composite, fiberglass reinforced polyester (FRP), and aluminum. Typically, 16 and 14 gauge hollow metal door frames are capable of hourly ratings up to three (3) hours. Door frames of the other materials might have limited hourly ratings 1/3-, 3/4-, and 1-1/2-hours depending on specific applications. Often, where the door panels and the door frames (other than hollow metal door frames) have the same maximum hourly ratings, the hourly ratings listed on the labels match. However, codes, past and present, do not require the hourly ratings of Chapter 6-type swinging doors to match.

A.4.2.1.5.1 The door assemblies specified in Chapter 6, Swinging Doors with Builders Hardware, are component-based systems. Each component is tested and listed, and in most cases, labeled for use a part of a fire-rated assembly. Building, fire, and life safety codes mandate the minimum fire protection ratings and fire resistance ratings for door assemblies, as well as their placements. Generally, the fire protection ratings of Chapter 6-type assemblies are three-quarters the rating of the barriers and walls in which they are installed; there are some exceptions where the ratings of the assemblies and the walls are the same. Swinging door assemblies comprised of 16 and 14 gauge hollow metal (aka steel) door frames and door panels of hollow metal, wood-composite construction, and other fire-rated materials can be products from different manufacturers. Typically, the hourly ratings of hollow metal door frames are greater than the hourly ratings of the door panels installed in them. In many cases, the hourly ratings of the door panels are considered to be the assemblies' overall hourly ratings since they are lower than the hourly ratings of the door frames.

In cases where hollow metal door frames include sidelights, transom lights, and combinations thereof, the maximum hourly ratings the frames are usually limited 3/4-hour (45 minutes); there are some exceptions where these frames are fire-protection-rated up to1-1/2 hours (90 minutes). When the hourly ratings of these doors frames is lesser than the hourly ratings of the doors installed in them, the hourly ratings of the door frames is considered to be the overall rating of the assemblies. Conversely, when the hourly ratings of the door panels installed in sidelight, transom light, and combination frames are lower than the hourly ratings of the door frames, the hourly ratings of the door panels is considered to be the overall rating of the assemblies.

Similarly, installing door hardware, glass and glazing materials, and other such components having maximum hourly ratings lesser than the ratings of the door frames and door panels, the hourly rating of the lowest-rated component should be considered to be the hourly rating of the assemblies. Therefore, careful consideration should be given when selecting each component for Chapter 6-type door assemblies to ensure the assemblies meet or exceed the minimum hourly ratings specified in the prevailing code(s).

A.4.2.1.5.2 Because Chapter 6-type swinging doors are component-based systems, manufacturers attach or emboss labels into many of the components forming these assemblies before the products ship into the field. Installers are expected to assemble the various components in the field to create fire-rated door assemblies. For the hourly fire rating of the

entire assembly to be valid, all of the necessary components need to be installed in accordance with their listing(s) and installation instructions. NFPA 80 mandates that the door assemblies are maintained in a constant state of readiness to contain a fire. Additionally, building, fire, and life safety codes contain specific operational functions of swinging doors located in the means of egress. Accordingly, swinging fire doors are expected to operate properly in accordance with the prevailing codes and standards.

Statement of Problem and Substantiation for Public Input

The proposed new section clarifies that the myriad components used to build Chapter 6-type fire door assemblies have a range of maximum hourly ratings. While many components can be used on some door assemblies, applications of certain components are limited to lower (and even the lowest) hourly rated assemblies. The maximum hourly rating of any Chapter 6-type assembly is limited to the rating of the lowest rated component.

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Public Input No. 22-NFPA 80-2025 [Section No. 4.2.1.5]

4.2.1.5

The label for oversized doors other than doors complying with Chapter 6 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

Statement of Problem and Substantiation for Public Input

Unlike Chapter 11, Rolling Steel Doors and Chapter 13, Service Counter Fire Doors, swinging complying with Chapter 6 do not use "oversized fire door labels"; they have a special-use "construction label" that covers untested sizes, hardware preparations, glazing areas, and other special conditions.

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Committee: FDW-AAA

Public Input No. 68-NFPA 80-2025 [Section No. 4.6.3]

~~**4.6.3** –~~

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

Statement of Problem and Substantiation for Public Input

The current text of 4.6.3 and 4.6.4.1 defines ‘builders hardware’ and as such it should be a defined term in Chapter 3 instead of in Chapter 4 General Requirements. See PI 67

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 67-NFPA 80-2025 [New Section after 3.3.16]	

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Public Input No. 16-NFPA 80-2025 [Section No. 4.6.4 [Excluding any Sub-Sections]]

In this standard, builders hardware shall be applied only to swinging doors complying with Chapter 6 .

Statement of Problem and Substantiation for Public Input

This proposal clarifies that builders hardware components are ONLY intended for Chapter 6-type doors; it's in the chapter's title.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 17-NFPA 80-2025 [Section No. 4.6.5 [Excluding any Sub-Sections]]	

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Public Input No. 69-NFPA 80-2025 [Section No. 4.6.4.1]

~~4.6.4.1~~ * –

~~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.~~

Statement of Problem and Substantiation for Public Input

The current text of 4.6.3 and 4.6.4.1 defines ‘builders hardware’ and as such it should be a defined term in Chapter 3 instead of in Chapter 4 General Requirements. See PI 67

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 67-NFPA 80-2025 [New Section after 3.3.16]	

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Public Input No. 17-NFPA 80-2025 [Section No. 4.6.5 [Excluding any Sub-Sections]]

~~Fire~~ For other than doors complying with Chapter 6, fire door hardware shall be applied to ~~both~~ swinging and sliding doors~~.~~

Statement of Problem and Substantiation for Public Input

This proposal clarifies that fire door hardware components are ONLY used on all the other door types covered in NFPA except for Chapter 6-type doors. "Fire Door Hardware" is in the title of Chapter 7.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 16-NFPA 80-2025 [Section No. 4.6.4 [Excluding any Sub-Sections]]	

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Public Input No. 40-NFPA 80-2025 [Section No. 4.8.4]

~~**4.8.4** – Clearance.~~

~~Where required by Chapters 6 through 16 , clearance under doors shall comply with 4.8.4 .~~

~~**4.8.4.1** * –~~

~~Clearance under the bottom of a door shall be a maximum of 3/4 in. (19 mm), unless otherwise specified by its listing.~~

~~**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 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** * –~~

~~Listed fire door accessories for mitigating bottom clearance more than 3/4 in. (19 mm) shall be permitted.~~

~~**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 in accordance with the manufacturer's listing.~~

Statement of Problem and Substantiation for Public Input

This proposal seeks to delete existing section 4.8.4 Clearances from chapter 4. A separate PI relocates this section to Chapter 6.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 39-NFPA 80-2025 [Section No. 6.3.1.8]	Moves Section 4.8.4 to Chapter 6.
Public Input No. 39-NFPA 80-2025 [Section No. 6.3.1.8]	

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Submittal Date:	Thu May 01 14:58:53 EDT 2025
Committee:	FDW-AAA

Public Input No. 11-NFPA 80-2025 [Section No. 5.1.2.1]

5.1.2.1*

Doors, shutters, and windows shall be ~~operable at all times.~~ maintained in a constant state of readiness to prevent a fire from spreading.

<<New>>

5.1.2.1.1* Components of doors, shutters, and windows shall not be required to operate after exposure to the elevated temperatures of a fire.

A.5.1.2.1.1 The fire door test standards (e.g., NFPA 252, UL 10B, and UL 10C) explicitly exempt swinging doors and hardware from being operable after testing. Additionally, components, such as auxiliary latches (aka fire pins), prevent door leaves from opening after exposure to the elevated temperatures of a fire. Other latching hardware components incorporate similar technology that renders the latch bolts inoperable ensuring they remain positively latched, causing the door to form a fixed barrier and maintain the fire rating of the walls and barriers in which they are installed.

Statement of Problem and Substantiation for Public Input

5.1.2.1, as it was orginally phrased, has been mistakenly interpreted by some AHJs to mean that fire doors must be operable before, during, and after a fire. The intent of 5.1.2.1 is to ensure the doors are properly installed, adjusted, and functioning BEFORE a fire so they are ready to contain a fire. This proposal seeks to clarify that all types of fire doors, shutters, and windows are maintained in a constant state of readiness to contain a fire. New 5.1.2.1.1 clarifies that the moving components of a fire door system (and operable windows) are not required to be operable AFTER exposure to a fire. See also 6.4.4.3.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 12-NFPA 80-2025 [New Section after 3.3.28]	

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Public Input No. 55-NFPA 80-2025 [Section No. 5.1.3]

5.1.3 Replacement.

5.1.3.1 Where it is necessary to replace fire doors, shutters, windows or their frames, glazing materials, hardware, and closing mechanisms, the replacements shall be installed and tested as required by this standard for new installations.

5.1.3.2*

Materials, including the doors, shutters, windows or their frames, glazing materials, hardware, and closing mechanisms shall not be reclaimed, reused, or reinstalled unless such elements have been reconditioned, tested, and placed in good and proper working condition and approved by the AHJ.

5.1.3.2.1 Upon completion of the installation, the reclaimed fire rated assembly shall be inspected and retested in accordance with 5.2.

A.5.1.3.2

Fire rated assemblies may consist of multiple listed products such as frames, hardware, glazing, and the door itself, where the combination is critical to create a compliant opening. Additionally, fire rated assemblies may also function as a normal mode of egress for day-to-day operation, where the normal to high levels of wear and tear will exist.

When an AHJ is considering the permitted use and installation of a reclaimed fire rated assembly, consideration should be given to the age and overall condition of the components, the proper functioning of all hardware, the compatibility of the components, the reconditioning performed, the original labeling for the fire protection rating, and previously listed installation.

Statement of Problem and Substantiation for Public Input

This proposal aims to create language to limit the use of reclaimed materials for use in fire rated opening protectives. It is understood that there may be efforts to reduce waste and promote sustainable solutions by means of reusing products such as fire doors and their components. However, there are no guidelines to permit a process of using reclaimed materials, while ensuring the fire rated opening will maintain the intended fire protection performance. Fire rated openings consist of multiple listed products such as doors, frames, hardware, and glazing where the combination is critical to create a compliant opening.

Additionally, fire doors commonly function as a normal mode of egress for day-to-day operation, where the normal to high levels of wear and tear will exist. Following the guidelines of NFPA 80, an installation involving a reclaimed fire door would only be subjected to the installation requirements of a new fire door, not accounting for any unseen damage or progression of modifications throughout the former life of the reclaimed fire door.

There are more examples and speculation that can be raised, but ultimately, the intention is to ensure that NFPA 80 includes language to limit the use of reclaimed products in an uncontrolled and, potentially, noncompliant manner. The building codes rely on the use of listed products for the protection of openings in fire rated assemblies and using reclaimed materials in an uncontrolled way potentially removes traceability of the origin of a product, affecting the integrity of labeled products and the product certifications.

Lastly, this proposal can benefit from the technical expertise of the committee, and it is understood that this current proposal may not fully address the concerns associated with the use of reclaimed materials. A task group or some other effort to expand the conversation on this topic may be something for the committee to consider.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 56-NFPA 80-2025 [Section No. 5.1.5]	

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Public Input No. 6-NFPA 80-2025 [Section No. 5.1.4.2.2 [Excluding any Sub-Sections]]

The following job site preparations shall be permitted:

(1) Holes for surface-applied hardware, function holes for mortise locks, and holes for labeled viewers

(2) ~~A maximum 3/4 in. (19 mm) wood and composite door undercutting~~

(3)

(4) Installation of protection plates *(see 6.4.5)*

Statement of Problem and Substantiation for Public Input

The provision for trimming 3/4 inch off the bottom of wood composite doors is an artifiact from the days (crica 1986) where 1/3 hour doors were permitted fitted to the door frames in the field by the installers. Today's modern wood composite doors are factory cut to final their finished sizes and might not have 3/4 inches of material remaining (depending on their internal construction).

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Public Input No. 7-NFPA 80-2025 [New Section after 5.1.4.2.2.1]

<<insert new section before 5.1.4.2.2.1

In cases where the internal core material of wood composite doors is exposed due improper fitting during installation or other field modification, the doors shall be replaced.

Statement of Problem and Substantiation for Public Input

The proposed new section clarifies that the door leaves need to be replaced when the internal core materials of wood composite doors becomes exposed on any edge or surface, the doors need to be replaced with new doors.

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Public Input No. 56-NFPA 80-2025 [Section No. 5.1.5]

5.1.5 Removal of Door or Window.

5.1.5.1 Where a fire door or fire window opening no longer functions as an opening, or the door or window is removed and not replaced, the opening shall be filled to maintain the required rating of the wall assembly.

5.1.5.2 A removed fire door or fire window assembly shall not be reclaimed for reinstallation or reuse in other openings in the same or separate building unless otherwise approved by the AHJ in accordance with 5.1.3.2.

Statement of Problem and Substantiation for Public Input

This proposal aims to create language to limit the use of reclaimed materials for use in fire rated opening protectives. It is understood that there may be efforts to reduce waste and promote sustainable solutions by means of reusing products such as fire doors and their components. However, there are no guidelines to permit a process of using reclaimed materials, while ensuring the fire rated opening will maintain the intended fire protection performance. Fire rated openings consist of multiple listed products such as doors, frames, hardware, and glazing where the combination is critical to create a compliant opening.

Additionally, fire doors commonly function as a normal mode of egress for day-to-day operation, where the normal to high levels of wear and tear will exist. Following the guidelines of NFPA 80, an installation involving a reclaimed fire door would only be subjected to the installation requirements of a new fire door, not accounting for any unseen damage or progression of modifications throughout the former life of the reclaimed fire door.

There are more examples and speculation that can be raised, but ultimately, the intention is to ensure that NFPA 80 includes language to limit the use of reclaimed products in an uncontrolled and, potentially, noncompliant manner. The building codes rely on the use of listed products for the protection of openings in fire rated assemblies and using reclaimed materials in an uncontrolled way potentially removes traceability of the origin of a product, affecting the integrity of labeled products and the product certifications.

Lastly, this proposal can benefit from the technical expertise of the committee, and it is understood that this current proposal may not fully address the concerns associated with the use of reclaimed materials. A task group or some other effort to expand the conversation on this topic may be something for the committee to consider.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 55-NFPA 80-2025 [Section No. 5.1.3]	

Submitter Information Verification

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Submittal Date: Sat May 31 17:33:02 EDT 2025
Committee: FDW-AAA

Public Input No. 23-NFPA 80-2025 [New Section after 5.2.3.6.1]

5.2.3.1.1

Where acceptance testing of existing assemblies is required by 5.5.10, replacement components shall comply with the requirements of this standard that were in effect at the time of replacement.

5.2.3.1.2* Original components shall be permitted to remain in service indefinitely provided they comply with the requirements of this standard that were in effect at the time of installation.

A.5.2.3.1.2 Operable components, such as hinges, latching hardware, and closing devices are subject to excessive wear and periodically need to be replaced. The maintenance provisions of Section 5.5 mandates that defective conditions impairing the operation of doors be repaired "without delay." Subsequent to completing the necessary corrective actions, section 5.5.10 requires the doors to be acceptance tested as specified in Section 5.2.3. While the replacement components need to comply with NFPA 80's provisions and requirements in effect at the time of replacement, other components (e.g., wire glass) that are original to the assembly—or otherwise predate the latest round of maintenance—and should be inspected in accordance with the provisions and requirements of NFPA 80 that were in effect at the time of their installation.

Statement of Problem and Substantiation for Public Input

This proposal seeks to complete the installation, inspection, testing, and maintenance cycles for door assemblies. Section 5.5.10 requires door assemblies to go through a new round of acceptance testing following maintenance work affecting the operations of the doors. As explained in the proposed annex comment, new components must comply with requirements at the time of replacement. Howerver, the original components remaining in service must only comply with the requirements that were in effect at the time of the original installation.

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Committee: FDW-AAA

Public Input No. 70-NFPA 80-2025 [Section No. 5.2.3.6.2]

5.2.3.6.2

As a minimum, the following items shall be verified:

(1) Labels are clearly visible and legible.

(2) No open holes or breaks exist in surfaces of either the door or frame.

(3) Glazing, vision light frames, and glazing beads are intact and securely fastened in place, if so equipped.

(4) The door, frame, hinges, hardware, and noncombustible threshold are secured, aligned, and in working order with no visible signs of damage.

(5) No parts are missing or broken.

(6) Door clearances do not exceed clearances listed in 4.8.4 and 6.3.1.8.

(7) The self-closing device is operational; that is, the active door completely closes and latches when operated from the full open and a 30 degree open position.

(8) If a coordinator is installed, the inactive leaf closes before the active leaf.

(9) Latching hardware operates and secures the door when it is in the closed position.

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

(11) No field modifications to the door assembly have been performed that void the label.

(12) Meeting edge protection, gasketing and edge seals, where required, are inspected to verify their presence and integrity.

(13) Signage affixed to a door meets the requirements listed in 4.1.6.

Statement of Problem and Substantiation for Public Input

It is critical to define a specific degree of opening from which the door is released and that positive latching must occur. Fire doors are not always cycled to the full open position and a lesser degree of opening should also be validated.

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Submittal Date: Wed Jun 04 14:35:47 EDT 2025
Committee: FDW-AAA

Public Input No. 59-NFPA 80-2025 [Section No. 5.5.10 [Excluding any Sub-Sections]]

Upon completion of maintenance or repair work, fire door assemblies shall be inspected and tested in accordance with 5.2.3.

Upon completion of maintenance or repair work, fire door assemblies shall be inspected and tested in accordance with 5.2.4.

Statement of Problem and Substantiation for Public Input

Acceptance Testing has largely been associated with the initial installation of a rolling fire door. The installation of a new fire door would not require maintenance. A maintenance requirement for rolling fire doors is most often associated with future damage to parts, components or operational failures after the initial installation and Acceptance Testing has been completed. Therefore, the Maintenance section should reference section 5.2.4 Periodic Inspection and Testing, not 5.2.3 Acceptance Testing. This revision also clarifies the current contradiction between sections 5.5.10.3 & 5.5.10.

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Committee: FDW-AAA

Public Input No. 71-NFPA 80-2025 [Section No. 6.1.4.3]

~~**6.1.4.3** –~~

~~The label described in 6.1.4.2 shall address the reinforcements necessary for the fire exit hardware.~~

Statement of Problem and Substantiation for Public Input

the requirements for fire exit hardware performance and labeling should be consolidated and made clear in one section of the Standard. The reinforcements referenced in 6.1.4.3 are part of the fire door assembly and are a requirement of the door listing

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 72-NFPA 80-2025 [Section No. 6.4.4.2.2]	

Submitter Information Verification

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Submittal Date: Wed Jun 04 14:37:43 EDT 2025
Committee: FDW-AAA

Public Input No. 1-NFPA 80-2024 [New Section after 6.1.5.2.2]

6.1.5.2.2.1 Self-closing doors shall close completely from full-open and any partially open positions.

Statement of Problem and Substantiation for Public Input

Section 6.1.5.2 implies that doors with self-closing operation must close reliably "each time it is opened," but the phrasing of 6.1.5.2.2 is ambigous. This proposal clarifies that self-closing doors must close every time they are opened, regardless of how far they are opened.

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Committee: FDW-AAA

Public Input No. 44-NFPA 80-2025 [Section No. 6.2.2]

6.2.2 Sills.

Sills shall be ~~installed~~ constructed in accordance with 4.8.2.

Statement of Problem and Substantiation for Public Input

According the definition 3.3.113, a sill is a structural component of the building; it is not a separate frame or hardware component that can be installed as part of a Chapter 6-type door assembly. This proposal clarifies that sills are constructed not installed (see 7.2.2, 8.2.2, 11.2.2, and 13.2.2).

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Submittal Date: Thu May 01 16:57:56 EDT 2025
Committee: FDW-AAA

Public Input No. 39-NFPA 80-2025 [Section No. 6.3.1.8]

6.3.1.8* ~~Clearances~~ **Clearance Dimensions Between Door Frames and Doors .**

6.3.1.8.1*–

~~Clearances dimensions~~

Clearance dimensions between doors and frames and meeting stiles of paired doors shall be measured on the pull side of the assemblies.

6.3.1.8.2*–

~~The clearances between~~

The clearance dimensions between the top and vertical edges of hollow metal doors and the frame, and the meeting stiles of doors swinging in pairs, shall be **1**⁄**8** in. ± **1**⁄**16** in. (3.18 mm ± 1.59 mm).

6.3.1.8.3*–

~~Listed~~

Listed fire door accessories for mitigating excessive

~~clearances~~

clearance dimensions between the top and vertical edges of doors and frames and the meeting stiles of doors swinging in pairs shall be permitted.

6.3.1.8.4

~~High-pressure decorative laminate (HPDL)-faced doors,~~

1⁄**3** -hour-rated

~~flush~~

wood doors

~~, and stile and rail wood~~

and plastic-faced wood-composite doors installed in hollow metal door frames shall not have

~~clearances~~

clearance dimensions greater than **3**⁄**16** in. (4.76 mm) between the door and frame and the meeting stiles of paired doors.

6.3.1.8.5*–

~~HPDL-faced doors, flush wood doors, and stile and rail wood doors with fire~~

Wood doors and plastic-faced wood composite doors fire ratings greater than **1**⁄**3** hour shall not have

~~clearances~~

clearance dimensions greater than **1**⁄**8** in. (3.18 mm) between the door and frame, regardless of the door frame construction, and the meeting stiles of paired doors.

~~**6.3.1.8.7** * –~~

~~Door~~

~~**6.3.1.8.6** –~~

~~Clearance under doors shall comply with 4.8.4 .~~

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

<<Insert New Section>>

6.3.1.9 Clearance Under Doors.

6.3.1.9.1* Clearance under the bottom of a door shall be a maximum of ¾ in. (19 mm), unless otherwise specified by its listing.

6.3.1.9.2* 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.

6.3.1.9.2.1 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 ¾ in. (19 mm).

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

6.3.1.9.3* Listed fire door accessories for mitigating bottom clearance more than ¾ in. (19 mm) shall be permitted.

6.3.1.9.4 Where the bottom of the door is more than 38 in. (965 mm) above the finished floor, the maximum clearance shall not exceed ⅜ in. (9.5 mm) or in accordance with the manufacturer's listing.

<<Note: The existing Annex A content at A.4.8.4.1, A.4.8.4.2, and A.4.8.4.3 should be relocated to A.6.3.1.9.1, A.6.3.1.9.2, and A.6.3.1.9.3 respectively.)

Statement of Problem and Substantiation for Public Input

This proprosal clarifies the clearance dimensions that vary depending on door and frame materials and fire ratings. 6.3.1.8.4 was rephrased to clarify that it only applies to 1/3-hour rated wood doors and plastic-faced wood-composite doors that are installed in hollow metal door frames. As it appears in the 2025 edition, it could be interpreted that "high-pressure decorative laminate" (aka plastic-faced wood-composite doors) of all levels of fire ratings since the 1/3-hour limitation is separated by a comma. Even though 6.3.1.8.5 addresses wood and wood-composite doors with ratings greater than 1/3-hour, many users might not read beyond 6.3.1.8.4 if they think it provides the answer to their question. The word 'dimensions" was added to in a few places for consistency with

This proposal also seeks to return the CLEARANCE UNDER DOORS to Chapter 6, Swinging Doors with Builders Hardware, where it belongs. Prior to the 1999 edition, the clearance under doors appeared in Chapter 2 where it applied ONLY to Swinging Doors with Builders Hardware. The TC moved these requirements to Chapter 1 in the 1999 edition as part of the reorganization of the document, and that carried over into the new Chapter 4 General that first appears in the 2007 edition. It was a mistake to move the clearance under doors to Chapter 1 since they ONLY apply to what we know now as Chapter 6 doors.

In both cases, the changes reflected in this proposal are intended to be editorial only; no technical changes were made.

Note: A separate PI seeks to delete Section 4.8.4 in its entirety.

Related Public Inputs for This Document

Related Input	Relationship

Public Input No. 40-NFPA 80-2025 [Section No. 4.8.4]	Deletes the Section 4.8.4 from Chapter 4.
Public Input No. 40-NFPA 80-2025 [Section No. 4.8.4]	

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Submittal Date: Thu May 01 10:53:18 EDT 2025
Committee: FDW-AAA

Public Input No. 33-NFPA 80-2025 [Section No. 6.4.1.3]

<<renumber existing 6.4.1.3 Coordinating Device to 6.4.1.7 and renumber the existing paragraphs accordingly.>>

6.4.1.3 Coordinating Device.

6.4.1.3.1

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

6.4.1.3.2

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

Statement of Problem and Substantiation for Public Input

The provisions for coordinating devices are out of sequence with the other paragraphs that address closing devices. Moving existing 6.4.1.3, 6.4.1.3.1, and 6.4.1.3.2 (coordinating devices) to follow Closing Devices (6.4.1.2, 6.4.1.4, 6.4.1.5, 6.4.1.6, and 6.4.1.7) improves the readability of this section. This proposal is editorial; no technical changes.

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Public Input No. 30-NFPA 80-2025 [Section No. 6.4.1.6]

~~**6.4.1.6** –~~

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

Statement of Problem and Substantiation for Public Input

6.4.1.6 creates an exception to the requirements of 6.4.1.5 that requires "all closing mechanisms" to be adjusted to acheive positive latching EVERY time the doors close. 6.1.5.2.2 mandates that doors with self-closing operation close and latch EACH time they are opened. As written, 6.4.1.6 ONLY reqiures self-closing doors to acheive positing latching when they are opened "no more than 30 degrees," which is to say that such doors are not required to close and latch when opened to LESS THAN 30 degrees. In other words, self-closing doors with spring hinges are not required to be positively latched when they are ajar; that is an unacceptable condition. Deleting 6.4.1.6 resolves the contradiction with 6.4.1.5 and ensures that all self-closing doors close reliably from any open position.

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Submittal Date: Thu Mar 13 09:21:39 EDT 2025
Committee: FDW-AAA

Public Input No. 31-NFPA 80-2025 [New Section after 6.4.3.1.4]

6.4.3.1.4.1

Where doors in excess of 60 in. (1.52 m) in height are equipped with two spring hinges, the uppermost hinge shall be ball bearing, unless otherwise permitted in the manufacturers' installation instructions.

Statement of Problem and Substantiation for Public Input

The uppermost (e.g., top) hinge location on swinging fire doors is load-bearing; they carry most of the doors' weight. Some of the spring hinge manufacturers recommend the use of ball bearing hinges at the tops of doors since their spring hinges are not designed to be load bearing. Installation instructions from certain hinge manufacturers don't share this recommendation. Accordingly, NFPA 80 needs to address both applications.

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Submittal Date: Thu Mar 13 09:54:00 EDT 2025
Committee: FDW-AAA

Public Input No. 28-NFPA 80-2025 [Section No. 6.4.3.4]

6.4.3.4 Shimming.

When ~~required~~ shimming of hinges is necessary to meet the ~~clearances stated in~~ clearance dimensions specified in 6.3.1.8,~~the shimming of hinges using steel shims shall~~ only steel shim materials shall be permitted.

Statement of Problem and Substantiation for Public Input

The existing language does not eliminate the use of materials other than steel to be used to shim hinges. The proposed revision clarifies that ONLY steel shim materials are permitted.

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Submittal Date: Wed Mar 12 16:15:03 EDT 2025
Committee: FDW-AAA

Public Input No. 34-NFPA 80-2025 [Section No. 6.4.4.1]

6.4.4.1

Only labeled locks and latches or labeled fire exit hardware ~~(panic devices) meeting both life safety requirements and fire protection requirements~~ shall be used.

Statement of Problem and Substantiation for Public Input

Deleting the parenthetical reference to "panic devices" clarifies that such devices are not permitted to be used on swinging fire doors. Additionally, the term "panic devices" is undefined; last cycle, we revised 6.4.4.2.1 by deleting the word "panic" since the labels on fire exit hardware devices only identify the as "fire exit hardware."

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Submittal Date: Thu Apr 03 10:44:06 EDT 2025
Committee: FDW-AAA

Public Input No. 72-NFPA 80-2025 [Section No. 6.4.4.2.2]

6.4.4.2.2

Fire exit hardware shall meet the requirements of ANSI / BHMA A156.3, American National Standard for Exit Devices and UL 305, Panic Hardware and shall have a permanently attached label that shows the manufacturer's name or logo, file number, listing agency and includes the words "fire exit hardware". ~~have a permanently attached label that~~ ~~bears the serial number and shows the manufacturer's name and type of approval.~~

Statement of Problem and Substantiation for Public Input

the requirements for fire exit hardware performance and labeling should be consolidated and made clear in one section of the Standard. The reinforcements referenced in 6.1.4.3 are part of the fire door assembly and are a requirement of the door listing

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 71-NFPA 80-2025 [Section No. 6.1.4.3]	

Submitter Information Verification

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Submittal Date: Wed Jun 04 14:40:20 EDT 2025
Committee: FDW-AAA

Public Input No. 9-NFPA 80-2025 [Section No. 6.4.4.4.2]

6.4.4.4.2

Locks with dead bolts that are interconnected with latch bolts and retract when the latch bolt is retracted shall be permitted ~~for use on fire doors within a means of egress~~ .

Statement of Problem and Substantiation for Public Input

Determining conditions that are or are not permitted in the means of egress is outside of NFPA 80's scope. Chapter 6 specifies construction, components, and the installations comprising fire-rated assemblies. The proposed deletion eliminates any potential conflict with the building, fire, and life safety codes.

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Submittal Date: Fri Mar 07 16:09:57 EST 2025
Committee: FDW-AAA

Public Input No. 13-NFPA 80-2025 [New Section after 6.4.4.4.3]

6.4.4.4.3.1

Electrified latch retraction and dogging of fire exit hardware devices that temporarily prevents positing latching shall be permitted, provided the devices become positively latched under alarm conditions.

Statement of Problem and Substantiation for Public Input

This proposal seeks to clarify the most common types of latching arrangements referenced in 6.4.4.4.3. Electified latch retraction and dogging have been used on fire-rated doors for decades, but NFPA 80 has remained ambiguous as to what special latching arrangements are permitted.

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Submittal Date: Mon Mar 10 10:47:54 EDT 2025
Committee: FDW-AAA

Public Input No. 10-NFPA 80-2025 [Section No. 6.4.4.6]

6.4.4.6

~~Locks and latches for pairs of doors needed for the movement of equipment where the~~ Where the inactive leaves of ~~the pairs of doors are not required for exit purposes shall comply with 6.4.4.6.1 and 6.4.4.6.2~~ :

~~6.4.4.6.1~~ –

~~Labeled~~

paired doors are required for egress purposes labeled , top and bottom, self-

~~latching~~

lacthing or automatic -latching flush bolts

;

or labeled two-point latches shall be

~~permitted~~

used .

6.4.4.6.~~2~~ 1 *

~~Where permitted by~~ Subject to the AHJ's approval , where the inactive leaves of paired doors are not required for egress purposes, labeled manually- operated ~~, labeled,~~ top and bottom flush-mounted or surface-mounted bolts ~~on the inactive leaf of a pair of doors shall be permitted.~~ shall be permitted.

6.4.4.6.2 _

Where permitted by the listing(s) of the door leaves and latching hardware manufacturers, auxiliary latches (aka fire pins) shall be permitted to replace the flush bolts.

<<Also, renumber existing A.6.4.4.6.2 to A.6.4.4.6.1.>>

Statement of Problem and Substantiation for Public Input

Exisitng 6.4.4.6, as written, is flawed. Building, fire, and life safety codes require the use of automatic- or self-latching flush bolts on the inactive leaves of paired doors where the inactive leaves are required to statisfy the egress capacity of the room, space, or area. Manually-operated flush bolts and surface bolts are typically permitted to be used on inactive leaves of paired doors where the inactive leaves are NOT required to satisfy the egress capacity.

The revision to 6.4.4.6.2 addresses the commonplace use of auxiliary latches to replace one or more flush bolts on paired doors. There are a few auxiliary latch applications requiring more than one fire pin; some require as many as five (5) fire pins on a single pair of doors.

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Public Input No. 74-NFPA 80-2025 [New Section after 6.4.4.12]

Signage Materials

6.4.5 Signage Materials.

6.4.5.1 Signage materials complying with Section 4.1.6 shall be permitted.

6 **.4.6 Polyvinyl Door Wraps.**

6.4.6.1 Polyvinyl door wraps complying with Section 4.1.7 shall be permitted.

Statement of Problem and Substantiation for Public Input

This proposal coordinates signage and door wrap provisions with Chapter 4.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 73-NFPA 80-2025 [New Section after 4.1.6.4]	
Public Input No. 75-NFPA 80-2025 [New Section after 14.3.2]	

Submitter Information Verification

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Submittal Date: Wed Jun 04 17:27:39 EDT 2025
Committee: FDW-AAA

Public Input No. 8-NFPA 80-2025 [Section No. 6.5]

<<Relocate existing Section 6.5 to immediately follow Section 6.1.2 at the top of the chapter; no other changes are recommended.>>

6.5 Application, Installation, and Adjustment.

6.5.1 General.

The installation of all components of a fire door assembly shall be in accordance with the listing of each component.

6.5.2 Manufacturers' Instructions.

6.5.2.1

All components shall be installed in accordance with the manufacturers' installation instructions.

6.5.2.2

All components shall be adjusted to function as described in the listing.

6.5.3 Attachment.

All components of a fire door assembly shall be attached firmly to walls, doors, and frames in a manner acceptable to the AHJ.

6.5.4 Mounting.

All mounting screws, bolts, or shields shall be steel except where otherwise permitted by this standard.

6.5.5 Anchorage.

Attachments to doors with composite cores shall provide firm anchorage for anticipated use.

Statement of Problem and Substantiation for Public Input

This proposal simply seeks to relocate existing section 6.5 Application, Installation, and Maintenance to the beginning of the chapter. It makes sense that these provisions be at the beginning of the chapter rather than at its very end. No technical or editioral changes are necessary.

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Submittal Date: Fri Mar 07 09:23:49 EST 2025
Committee: FDW-AAA

Public Input No. 26-NFPA 80-2025 [Section No. 6.5.3]

6.5.3 Attachment.

All components of a fire door assembly shall be attached firmly to walls, doors, and frames ~~in a manner acceptable to the AHJ.~~ using fasteners, anchors, and other means of attachments specified by the manufacturers for each application and in accordance with their listing(s) and installation instructions.

Statement of Problem and Substantiation for Public Input

Manufacturers include the necessary and fasteners, anchors, and auxiliary items for securing their components to walls, floors, door frames, and doors. In most, if not all cases,only these fasteners and anchors satisfy the listing condtions appropriate to each application as described in their installation instructions. Substituted fasteners from other manufacturers and sources might invalidate the fire rating of the affected components and therefore the entire assembly. Product warranties might also be invalidated by the use of substituted fasteners. Most AHJs are unaware of the myriad of fasteners and anchors used by swinging door and hardware manufacturers, and it is unreasonable to burden them with determining which means of fastening should be used in any given application.

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Submittal Date: Wed Mar 12 15:21:33 EDT 2025
Committee: FDW-AAA

Public Input No. 42-NFPA 80-2025 [Section No. 13.1.1]

13.1.1– General.

This chapter shall cover the installation of new and existing service counter fire door assemblies.

13.1.1.1 New Doors .

13.1.1.1.1 New door assemblies shall be installed in accordance with this chapter and Chapter 4.

13.1.1.1.2 Upon completion of installation, acceptance testing of new door assemblies shall be performed in accordance with 5.2.3.

13.1.1.2 Existing Doors. Existing door assemblies shall be inspected and tested in accordance with 5.2.4.

13.1.1.3 Maintenance.

13.1.1.3.1 New and existing door assemblies shall be maintained in accordance with Section 5.5.

13.1.1.3.2 Upon completion of maintenance that affects the operation and performance of the assembly, doors shall be inspected and tested in accordance with 5 . 1.1.3 and 5.2.4.

Statement of Problem and Substantiation for Public Input

While service counter fire doors are comprised of opening protectives covered in chapters 8, 10, and 11, there are a Chapter 13 has several additional provisions and requirements that need to be considered during acceptance testing, performing periodic inspection and testing, and maintenance. This proposal adds the links to Chapter 4 and Chapter 5, commensurate with the other door chapters.

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Submittal Date: Thu May 01 16:16:24 EDT 2025
Committee: FDW-AAA

Public Input No. 41-NFPA 80-2025 [Section No. 13.1.2.1]

13.1.2.1*

Service counter fire doors shall be one of the following three general types:

(1) ~~Swinging door~~ Door panels of a single or multiple section vertical type, integrally mounted in a four-sided frame to form a labeled door and frame assembly

(2) Horizontally or vertically sliding ~~door~~ doors complying with Chapter 8 and Chapter 10.

(3) Rolling steel fire doors complying with Chapter 11.

A.13.1.2.1 Service counter fire doors can be comprised from the opening protectives specified in Chapters 8, 10, and 11. The doors can be sectional or multi-sectional similar to overhead garage doors, and they can have curtains formed of interlocking slats (such as those used in rolling steel doors), or they can single door panels such as those used in horizontally sliding and vertically sliding doors. Closing mechanisms of service counter fire doors comprised of Chapter 11 opening protectives usually include a counterbalance system that controls the closing speeds of the doors under alarm conditions. Some service counter fire doors can have motorized operation for daily use. Closing mechanisms for service counter fire doors comprised of Chapter 8 and Chapter 10 opening protectives typically use counterweights, cables, pulleys, and fusible links.

Statement of Problem and Substantiation for Public Input

This proposal seeks to correct an error that has appeared in NFPA 80 for since the 2007 edition. The 1970 edition of NFPA 80 was the first to include Service Counter Fire Doors. Section 1702(a) stated: "Door panels of a single or multiple section vertical type, integrally mounted in a four-sided frame to form a labeled door and frame assembly; or..." This statement remained unchanged until the 2007 edition where the word "swinging" was added to the beginning of the statement; apparently, without any documented technical justification. As you might be aware, the 2007 edition of NFPA was completely reorganized and edited to comply with NFPA's Manual of Style.

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Committee: FDW-AAA

Public Input No. 43-NFPA 80-2025 [Section No. 13.4.2]

13.4.2

~~Swinging~~ Horizontally ~~-- or sliding-type service~~ and vertically-sliding service counter fire doors shall be made automatic closing by a system of weights suspended by ropes, cables, or chains over pulleys that cause the door to close when activated by release of an automatic fire detector.

Statement of Problem and Substantiation for Public Input

This proposal seeks to rephrase 13.4.2 to address the closing mechanisms used on Chapter 8 and Chapter 10 doors; they routinely use counterweights and pulley systems. The only swinging doors that use a counterweight and pulley closing mechanism are the doors specified in Chapter 7, Swinging Doors with Fire Door Hardware—there are very few, if any, new Chapter 7 door assemblies being made today. More importantly, if there are any new Chapter 7 doors, it's extremely unlikely that they would be used as a service counter fire door as their are much better choices for this application. The statement in 13.4.2 is based on the original lanuage that first appeared in the 1973 edition of NFPA 80; it remained unchanged until the 2025 edition.

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Public Input No. 75-NFPA 80-2025 [New Section after 14.3.2]

Polyvinyl Door Wraps

14.4 Polyvinyl Door Wraps.

14.4.1 Polyvinyl door wraps complying with Section 4.1.7 shall be permitted.

Statement of Problem and Substantiation for Public Input

This proposal coordinates Chapter 14 with the proposed new provisions for polyvinyl door wraps in Section 4.1.7.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 73-NFPA 80-2025 [New Section after 4.1.6.4]	
Public Input No. 74-NFPA 80-2025 [New Section after 6.4.4.12]	

Submitter Information Verification

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Submittal Date: Wed Jun 04 17:34:57 EDT 2025
Committee: FDW-AAA

Public Input No. 61-NFPA 80-2025 [Section No. 20.1.4]

20.1.4 Listing.

Dampers and damper position indicator devices shall be listed in accordance with 20.1.4.1 through 20.1.4.~~4~~ 5 .

20.1.4.1

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

20.1.4.2

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

20.1.4.3

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

20.1.4.4

Ceiling radiation dampers shall be listed in accordance with UL 555C, *Ceiling Dampers*.

20.1.4.5

Damper position indicator devices used for remote damper inspections shall be listed and labeled by a Nationally Recognized Testing Laboratory (NRTL) for such use.

Statement of Problem and Substantiation for Public Input

Substantiation: All dampers, whether fire, smoke, combination, corridor or ceiling radiation dampers must be UL listed per Section 20.1.4 of NFPA 80. Section 20.3.1.1 states that field modifications to the damper shall be in accordance with the damper manufacturer's installation instructions and listing. The current language regarding position indication devices, including those used in remote inspections, does not clearly state that these devices should also be listed to an applicable UL standard, which could cause confusion in the market and pose a serious safety hazard to the public if inferior, untested, and unlisted products are used o "prove" the performance of such listed devices without being listed themselves. The offered proposal would bring these sections into conformance with the language and intent of the other sections of this standard.

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Submittal Date: Tue Jun 03 13:33:11 EDT 2025
Committee: FDW-AAA

Public Input No. 62-NFPA 80-2025 [Section No. 20.3.1]

20.3.1 Modifications.

20.3.1.1

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

20.3.1.2

Position indication functionality shall be permitted to be added to an existing damper not originally designed with position indication if the position indicator is listed and labeled for such use and the accuracy of the open and closed indication method is confirmed as required by 20.3.4.2.3.3~~(B)(3)~~ .

20.3.1.3

Where the field modification includes adding the capability for remote inspection, the position indicator devices and monitoring equipment shall be listed and labeled for such use and be tested for functionality in accordance with 20.3.4.2.3.3.

Statement of Problem and Substantiation for Public Input

Substantiation: All dampers, whether fire, smoke, combination, corridor or ceiling radiation dampers must be UL listed per Section 20.1.4 of NFPA 80. Section 20.3.1.1 states that field modifications to the damper shall be in accordance with the damper manufacturer's installation instructions and listing. The current language regarding position indication devices, including those used in remote inspections, does not clearly state that these devices should also be listed to an applicable UL standard, which could cause confusion in the market and pose a serious safety hazard to the public if inferior, untested, and unlisted products are used to "prove" the performance of such listed devices without being listed themselves. The offered proposal would bring these sections into conformance with the language and intent of the other sections of this standard as well as bring into alignment with NFPA 105 requiring modifications to be verified by utilizing the Remote Inspection Method.

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Public Input No. 47-NFPA 80-2025 [Section No. 20.3.4.1.3]

20.3.4.1.3*

~~In~~ **Where approved by the AHJ, i** n 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 **when documented as required by 20 . 3.4.3 .**

Statement of Problem and Substantiation for Public Input

NFPA 105, Section 7.5.2.2.3 allows an inaccessible damper to be exempt from testing, provided the Authority Having Jurisdiction (AHJ) approves the exemption and proper documentation is maintained to ensure that occupant safety is not compromised. NFPA 80, Section A.7.5.2.2.3 offers additional guidance to assist the AHJ in making this determination. The proposed amendments to NFPA 105, Sections 20.3.4.1.3 and A.20.3.4.1.3 are intended to bring NFPA 105 into alignment with NFPA 80, promoting consistency across both standards and supporting uniform enforcement practices.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 49-NFPA 80-2025 [Section No. A.20.3.4.1.3]	

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Committee: FDW-AAA

Public Input No. 63-NFPA 80-2025 [Section No. 20.3.4.1.4]

20.3.4.1.4 Modifications.

20.3.4.1.4.1

Position indication functionality shall be permitted to be added to an existing damper not originally designed with position indication provided ~~that the~~ the position indicator is listed and labeled for such use and that the accuracy of the open and closed indication method is confirmed as required by 20.3.4.2.3.3~~(B)(1)~~ .

20.3.4.1.4.2

Any field modifications made to dampers which have position indicating functionality added shall be installed per the manufacturer's installation instructions and listing for retrofitted equipment.

Statement of Problem and Substantiation for Public Input

Substantiation: All dampers, whether fire, smoke, combination, corridor or ceiling radiation dampers must be UL listed per Section 20.1.4 of NFPA 80. Section 20.3.1.1 states that field modifications to the damper shall be in accordance with the damper manufacturer's installation instructions and listing. The current language regarding position indication devices, including those used in remote inspections, does not clearly state that these devices should also be listed to an applicable UL standard, which could cause confusion in the market and pose a serious safety hazard to the public if inferior, untested, and unlisted products are used to "prove" the performance of such listed devices without being listed themselves. The offered proposal would bring these sections into conformance with the language and intent of the other sections of this standard as well as bring into alignment with NFPA 105 requiring modifications to be verified by utilizing the Remote Inspection Method.

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Public Input No. 45-NFPA 80-2025 [Section No. 20.3.4.2.3.3(A)]

(A) General.

Dampers using the remote inspection method shall comply with all of the following:

(1) The damper shall positively indicate when it is fully open and fully closed.

(2) The initial remote inspection**, performed during acceptance testing,** shall include a visual inspection of the damper in accordance with 20.3.4.2.3.2.

(3) **Each damper shall be visually inspected in accordance with 20.3.4.2.3.2 one year after the initial remote inspection.**

(4) 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 Input

The intent of the remote damper inspection provisions was to require a physical inspection at two critical points: during the initial acceptance test and again one year after installation. This approach ensures that the remote damper is physically verified for proper operation both immediately after installation and after one year of service. However, the current language does not clearly convey this intent. The proposed changes are intended to clarify these requirements and align the code with the original intent.

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Committee: FDW-AAA

Public Input No. 50-NFPA 80-2025 [New Section after 20.3.4.4.5]

20.3.4.4.6 Failure to comply with the provisions of the approved performance-based option shall result in the requirement to comply with the prescriptive inspection, testing, and maintenance requirements of Section 20.3.3.

Statement of Problem and Substantiation for Public Input

To ensure consistency between NFPA 80 and NFPA 105, the Performance-Based Option for Fire Life Safety Damper inspections must be aligned across both standards. The addition of 20.3.4.4.6, matches section 7.5.2.5.6 in NFPA 105. This will help clarify compliance pathways, reduce confusion for enforcement authorities, and support uniform application in the field.

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Public Input No. 51-NFPA 80-2025 [New Section after 20.3.5.6]

20.3.5.7

Field repair of individual components for damper assemblies shall be done in accordance with section 20.3.5.3 utilizing equal or better components. Repairs should be made by a qualified person and upon completion, documented in accordance with section 20.3.5.5.

Statement of Problem and Substantiation for Public Input

Currently there is no clarification or definition for the field repair of components within the damper assembly and a failure of one of these should not require, nor result in, a completely new installation. Every day, we are asked by contractors, designers, and facility managers if they are allowed to replace a failed actuator and if we can provide wording to clarify for the AHJ. This often occurs when there is nothing wrong with the damper itself but a failure in one of the other components in the damper assembly has occurred. To be clear this is not a modification to a new installation or the damper itself but rather a maintenance task. An example would be conversion from pneumatic to electric actuation when the damper or actuator manufacturer no longer exists, in this example, the user would be required to install an entirely new assembly. At this time there is only one clear statement that mentions a change to a component of the assembly is possible and it is found in the UL Marking and Application Guide under chapter 5. Section D, specifically: As such, field mounting or substitution of actuators is not covered within the scope of the UL certification of the product. However, this does not necessarily preclude replacement of actuators in the field (full section below for reference).

D. DAMPER ACTUATORS
Smoke dampers, corridor dampers, and combination fire-smoke dampers are equipped with factory installed electric or pneumatic actuators which can be controlled remotely to
open and close the damper blades. The airflow and pressure ratings marked on the dampers are dependent upon the particular combination of damper type, actuator type and
linkages between the damper blades and actuator. As such, field mounting or substitution of actuators is not covered within the scope of the UL certification of the product.
However, this does not necessarily preclude replacement of actuators in the field.

Like any appliance, field servicing of these products is not covered under the scope of the UL certification program. As with any part of the damper, it is expected that replacement
of actuators in the field be done in accordance with the damper manufacturer's normal field servicing program.

We would like to offer that this is not enough to guide someone to the correct and obvious result which is that an in-operable damper must be repaired without delay (7.6.3 / 20.3.5.3).

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Submittal Date: Thu May 29 15:46:53 EDT 2025
Committee: FDW-AAA

Public Input No. 60-NFPA 80-2025 [Section No. A.4.7.4.2]

A.4.7.4.2

The arrangements shown in Figure A.4.7.4.2(a) through Figure A.4.7.4.2(l), Figure A.4.6.5(b) through Figure A.4.6.5(e), and Figure A.4.6.5(h) are recommended to provide the performance intended. Other arrangements acceptable to the AHJ could be permitted to be used.

Figure A.4.7.4.2(a) Closing Devices for Single Swinging Door.

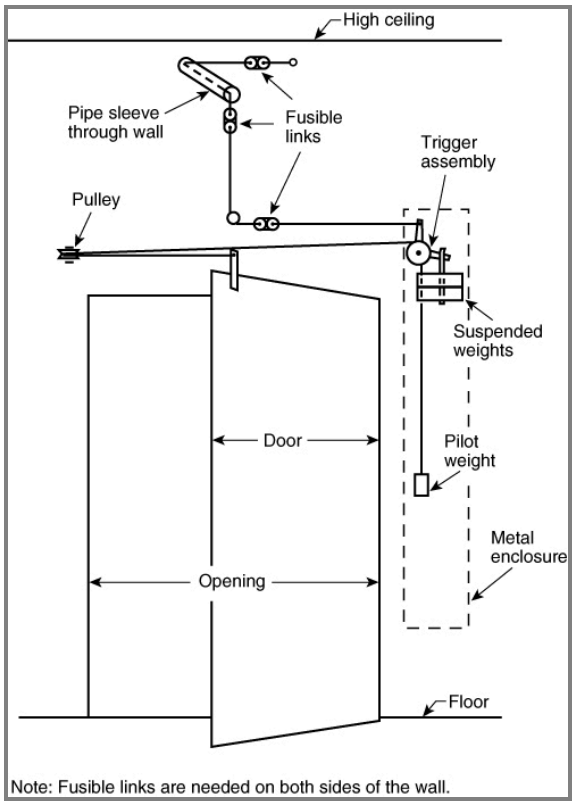


Figure A.4.7.4.2(b) Closing Devices for Doors Swinging in Pairs.

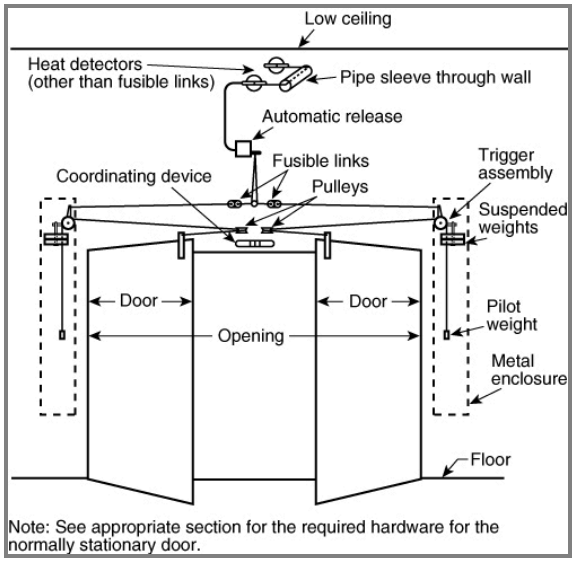


Figure A.4.7.4.2(c) Closing Devices for Single Sliding Door (Inclined Track).

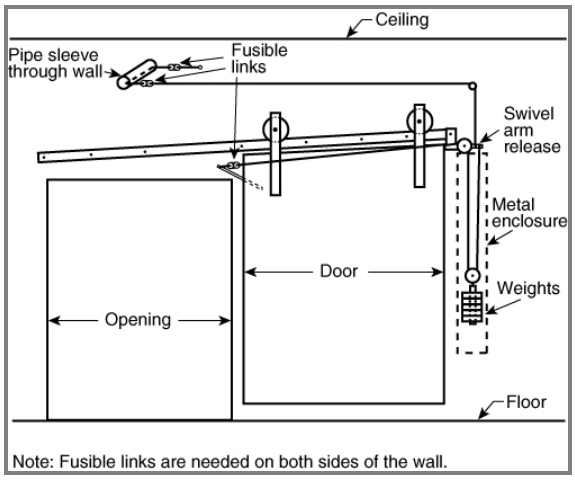


Figure A.4.7.4.2(d) Closing Devices for Single Sliding Door, Example 1 (Level Track).

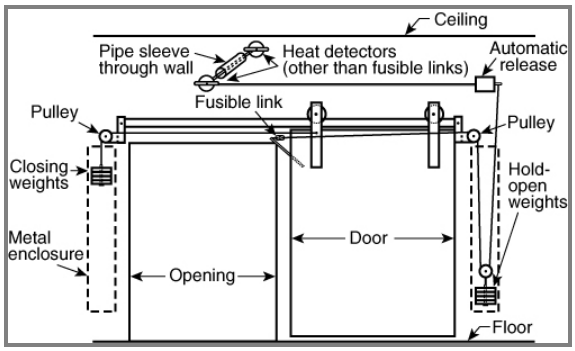


Figure A.4.7.4.2(e) Closing Devices for Single Sliding Door, Example 2 (Level Track).

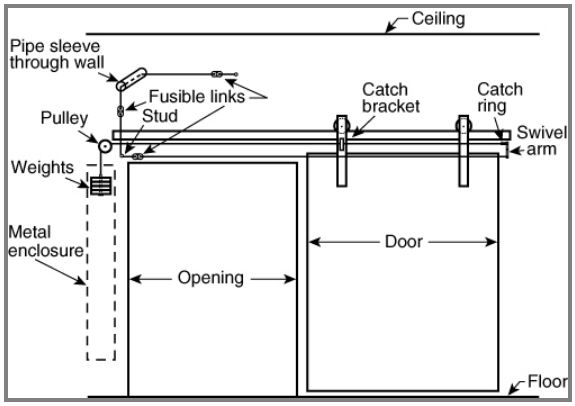


Figure A.4.7.4.2(f) Closing Devices for Center-Parting, Horizontally Sliding Doors (Inclined Track).

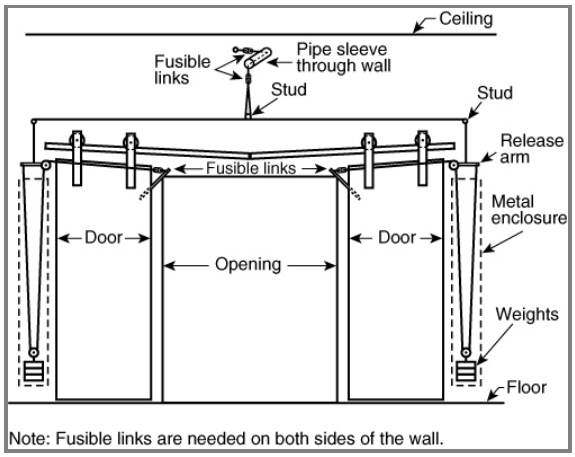


Figure A.4.7.4.2(g) Closing Devices for Center-Parting, Horizontally Sliding Doors, Example 1 (Level Track).

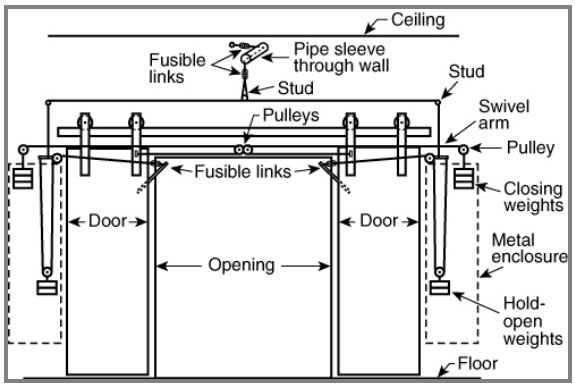


Figure A.4.7.4.2(h) Closing Devices for Center-Parting, Horizontally Sliding Doors, Example 2 (Level Track).

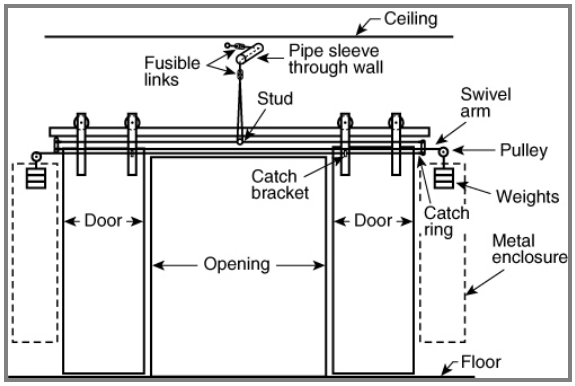


Figure A.4.7.4.2(i) Closing Devices for Vertically Sliding Door.

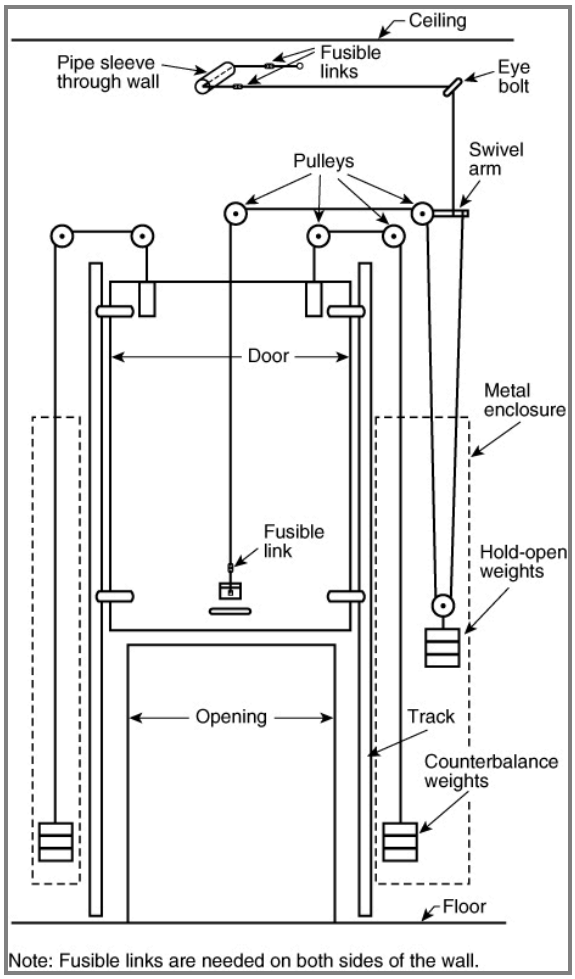


Figure A.4.7.4.2(j) Vertically Sliding, Steel-Sectional Overhead Door.

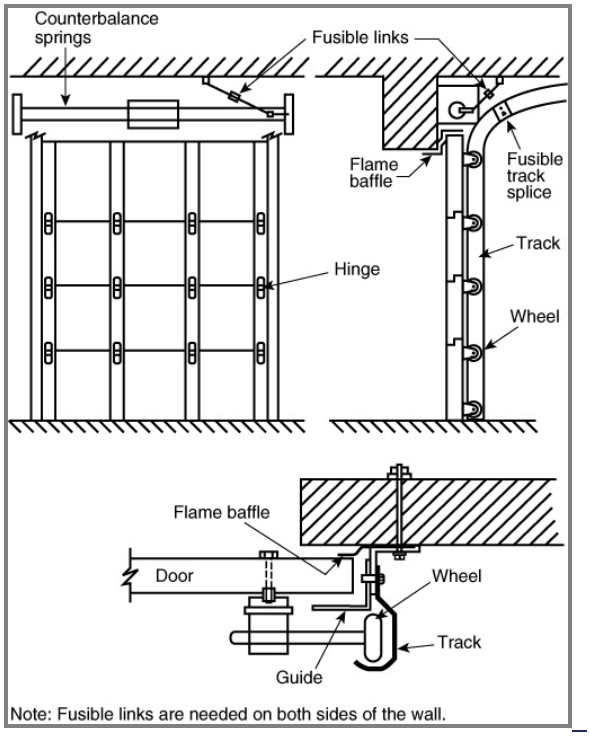


Figure A.4.7.4.2(k) Rolling Steel Doors — Surface Mounted.

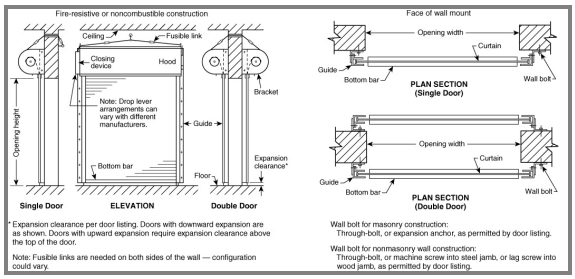
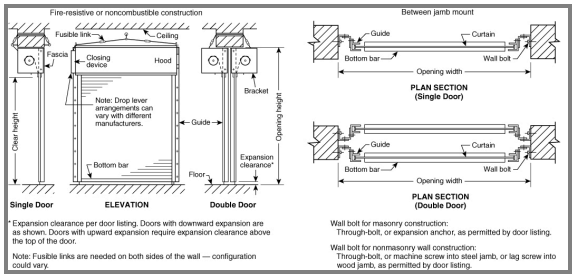


Figure A.4.7.4.2(l) Rolling Steel Doors — Mounted Between Jambs.



Additional Proposed Changes

File Name	Description	Approved
A.4.7.4.2k.jpg	A.4.7.4.2 (K) Rolling Steel Doors - Surface Mounted	
A.4.7.4.2l.jpg	A.4.7.4.2 (L) Rolling Steel Doors - Mounted Between Jambs	

Statement of Problem and Substantiation for Public Input

Proposed language to provide explanatory verbiage addressing frequently asked questions regarding section 4.7.4.2 and A.4.7.4.2 (k) pertaining to Exterior Wall Applications.

Proposed language to provide explanatory verbiage addressing frequently asked questions regarding section 4.7.4.2 and A.4.7.4.2 (l) pertaining to Exterior Wall Applications.

Submitter Information Verification

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Submittal Date: Mon Jun 02 13:42:38 EDT 2025
Committee: FDW-AAA

Public Input No. 49-NFPA 80-2025 [Section No. A.20.3.4.1.3]

A.20.3.4.1.3

In existing buildings it is recognized that some dampers might have become inaccessible for various reasons. Inaccessible dampers are those that have physical barriers or limitations where one cannot perform the required inspections or tests. **The** ~~inability to test a single damper might not~~ **use of the term inaccessible is meant to convey that there is a significant physical or structural impediment(s) to complying with the code due to existing construction features, topography, or other existing constraints that would make testing the single damper technically feasible. However, dampers that pose a significant risk to the performance of the system or the building occupants should not be omitted from periodic testing due to inaccessibility. Claiming a damper is accessible without documentation that the accessible damper will not pose a significant risk to the performance of the system** ~~when the system is fully ducted.~~ **and technical justification for the designation would not be justification for an AHJ to grant an exemption for a single damper. Maintenance should still be required per NFPA 80 Section 20.3.5.**

Statement of Problem and Substantiation for Public Input

NFPA 105, Section 7.5.2.2.3 allows an inaccessible damper to be exempt from testing, provided the Authority Having Jurisdiction (AHJ) approves the exemption and proper documentation is maintained to ensure that occupant safety is not compromised. NFPA 80, Section A.7.5.2.2.3 offers additional guidance to assist the AHJ in making this determination. The proposed amendments to NFPA 105, Sections 20.3.4.1.3 and A.20.3.4.1.3 are intended to bring NFPA 105 into alignment with NFPA 80, promoting consistency across both standards and supporting uniform enforcement practices.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 47-NFPA 80-2025 [Section No. 20.3.4.1.3]	

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Public Input No. 57-NFPA 80-2025 [Section No. L.1.2.6]

L.1.2.6 UL Publications.

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

UL 9, *Fire Tests of Window Assemblies*, 2009, revised ~~2020~~ 2024 .

UL 10B, *Fire Tests of Door Assemblies*, 2008, revised ~~2020~~ 2024 .

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

UL 10D, *Fire Tests of Fire-Protective Curtain Assemblies*, 2017, revised 2022.

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

UL 752, *Bullet-Resisting Equipment*, ~~2005, revised 2021~~ 2023 .

Statement of Problem and Substantiation for Public Input

Update of UL references to the document.

Related Public Inputs for This Document

Related Input	Relationship
Public Input No. 53-NFPA 80-2025 [Section No. 2.3.6]	

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Submittal Date: Sat May 31 17:34:52 EDT 2025
Committee: FDW-AAA

TG NAME	Remote Damper Inspection Task Group
TG SCOPE	Review the related second revisions [A2025-80-SR-33, A2025-105-SR-8], certified amending motions [CAM 80-2/6, CAM 105-2/5], and Standards Council decisions [D#24-2, D#24-3] from the previous cycle and related public input [80-PI-45, 105-PI-42, 105-PI-43] from this cycle related to the visual inspection of dampers utilizing the remote inspection method. Draft proposed language for NFPA 80 and NFPA 105 as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.
TG CHAIR	Keith Pardoe
TG MEMBERS	Joe Pickens, Michael Nicasio, Marty Gissel, Chad Beebe, Keith Lippincott, Bruce Campbell, Alex Talwar, Joe Glaski, Jerry Gorrell, Robert Kuks, Michael Savage, Bill Koffel, Phil Montouri* *Non-committee member

TASK GROUP RECOMMENDATION	
MOTION	Create first revisions based on 105-PI-42 and 105-PI-43
REVISION	**7.5.2.3.3.1(C)** The initial ~~remote~~ inspection, required by 7.5.2.2.1, shall include a visual inspection of the damper in accordance with 7.5.2.3.2.
STATEMENT	As submitted, 105-PI-42 added a reference in item (C) to Acceptance Testing under the Remote Inspection Method section. The first revision accomplishes the submitter's intent as 7.5.2.3.2 addresses the one year after acceptance testing, and adds a visual inspection requirement to it. This language is consistent with the first revision language for NFPA 80. 105-PI-43 proposed adding language to NFPA that was nearly identical to the similar provisions in NFPA 80. The action on PI 45-80 (2025) was to reject, but see a first revision that satisfied the submitter's concerns. Rejecting this PI retains consistency between NFPA 105 and NFPA 80.

TASK GROUP RECOMMENDATION	
MOTION	Create a first revision based on 80-PI-45
REVISION	**20.3.4.2.3.3 Remote Inspection Method.** **(A) General.** Dampers using the remote inspection method shall comply with all of the following: (1) The damper shall positively indicate when it is fully open and fully closed. (2) The initial ~~remote~~ inspection, required by 20.3.4.1.1, shall include a visual inspection of the damper in accordance with 20.3.4.2.3.2. (3) The visual inspection shall confirm that the position indication method accurately reflects the full-open and full-closed position of the damper.

STATEMENT	As submitted, 80-PI-45 added a reference in item (2) to Acceptance Testing under the Remote Inspection Method section. Item (3) of the PI added a visual inspection "…in accordance with 20.3.4.2.3.2 one year after the initial remote inspection." The first revision accomplishes the submitter's intent as 20.3.4.1.1 addresses the one year after acceptance testing, and adds a visual inspection requirement to it.

TG NAME	Reclaimed Materials
TG SCOPE	Review Public Inputs [80-PI-55, 105-PI-51] related to use of reclaimed materials in NFPA 80 and NFPA 105. Draft response to public inputs and requirements related to permissible or prohibited use of reclaimed materials in NFPA 80 and NFPA 105 as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.
TG CHAIR	Michael Nicasio
TG MEMBERS	Karen Bishop, Kurt Roeper, Hal Kelton, David Mount, Joe Anderson, Marilyn Latham-Morgan, Tim Weller, Curt Schroeder, Matthew Phillips, Dave Dawdy

NFPA 80

TASK GROUP RECOMMENDATION	
MOTION	Create a Committee Input on [80] PIs-#54, 55, and 56
REVISION	**5.1.5 Removal**. ~~**of Door or Window.**~~ ~~Where a fire door or fire window opening no longer functions as an opening, or the door or window is removed and not replaced, the opening shall be filled to maintain the required rating of the wall assembly.~~ **5.1.5.1** Where a fire door or fire window opening no longer functions as an opening, or the door or window is removed and not replaced, the opening shall be filled to maintain the required rating of the wall assembly. **5.1.5.2*** A removed fire door or frame assembly per Chapter 6 shall not be relocated for use in other openings in the same or separate building unless otherwise approved by the AHJ. **A.5.1.5.2** Fire rated assemblies can consist of multiple listed products such as frames, hardware, glazing, and the door itself, where the combination is critical to create a compliant opening. Additionally, fire rated assemblies can also function as a normal mode of egress for day-to-day operation, where normal to high levels of wear and tear will exist. When an AHJ is considering the permitted use and installation of a relocated fire rated assembly, consideration should be given to the age and overall condition of the components, the proper functioning of all hardware, the compatibility of the components, the reconditioning performed, the original labeling for the fire protection rating, applicable code at the time of reinstallation, and previously listed installation.

	5.1.5.2.1 Where components of the assembly such as hardware or closing mechanisms are removed for repair, the assembly shall be provided with listed or labeled parts or parts obtained from the original manufacturer to allow the door to properly function, without delay. **5.1.5.2.1.1*** Any repair to the component shall be in accordance with the manufacturer's listing. **A.5.1.5.2.1.1** Repairs of hardware or closing mechanism can include the lubrication of moveable parts, firmware updates, battery replacement, and tightening of fasteners. The original manufacturer should be contacted concerning allowable repairs or maintenance. **5.1.5.2.1.2** Repaired components are not prohibited for use on new or existing installations. **5.1.5.2.1.3** Installation of repaired components on new or existing installations that require field modifications shall comply with 5.1.4.
STATEMENT	The task group discussed the principles behind PIs-#54, 55, and 56 of NFPA 80, noting applications of reused listed materials in building types such as hospitals and hotels. The group also discussed applications when building owners convert business occupancies into residential occupancies, where during this process, building elements, such as listed doors and their components, are removed for potential reuse. Based on the input from the task group, it is recommended to create a Committee Input for further development with the Technical Committee. The group drafted initial revisions for consideration, where the revisions include modifying the current 5.1.5 Removal of Door or Window section to incorporate language covering the removing and replacement of assemblies or their components. The title was modified to remove "Door or Window," so as not to exclude removed assemblies or components such as hardware and closing mechanisms. Additionally, the group determined that it would be valuable to consider limiting the topic of reused or relocated assemblies or components to doors found in Chapter 6 of NFPA 80.

NFPA 105

TASK GROUP RECOMMENDATION	
MOTION	Create a Committee Input on [105] PIs-#50 and 51
REVISION	**5.1.2 Removal**. ~~**of Smoke Doors**.~~ ~~Where a smoke door no longer functions as an opening or is removed and not replaced, the opening shall be filled with construction to maintain the smoke partition or smoke barrier properties of the wall.~~ **5.1.2.1** Where a smoke door no longer functions as an opening or is removed and not replaced, the opening shall be filled with construction to maintain the smoke partition or smoke barrier properties of the wall. **5.1.2.2*** A removed smoke door or frame assembly per Chapter 6 shall not be relocated for use in other openings in the same or separate building unless otherwise approved by the AHJ. **A.5.1.2.2** Smoke rated assemblies can consist of multiple listed products such as frames, hardware, glazing, and the door itself, where the combination is critical to create a compliant opening. Additionally, smoke rated assemblies can also function as a normal mode of egress for day-to-day operation, where normal to high levels of wear and tear will exist. When an AHJ is considering the permitted use and installation of a relocated smoke rated assembly, consideration should be given to the age and overall condition of the components, the proper functioning of all hardware, the compatibility of the components, the reconditioning performed, the original labeling, applicable code at the time of reinstallation, and previously listed installation. **5.1.2.2.1** Where components of the assembly such as hardware or closing mechanisms are removed for repair, the assembly shall be provided with listed or labeled parts or parts obtained from the original manufacturer to allow the door to properly function, without delay. **5.1.2.2.1.1*** Any repair to the component shall be in accordance with the manufacturer's listing. **A.5.1.2.2.1.1**

	Repairs of hardware or closing mechanism can include the lubrication of moveable parts, firmware updates, battery replacement, and tightening of fasteners. The original manufacturer should be contacted concerning allowable repairs or maintenance. **5.1.2.2.1.2** Repaired components are not prohibited for use on new or existing installations. **5.1.2.2.1.3** Installation of repaired components on new or existing installations that require field modifications shall comply with 5.1.5.
STATEMENT	The task group discussed the principles behind PIs-#50 and 51 of NFPA 105, noting applications of reused listed materials in building types such as hospitals and hotels. The group also discussed applications when building owners convert business occupancies into residential occupancies, where during this process, building elements, such as listed doors and their components, are removed for potential reuse. Based on the input from the task group, it is recommended to create a Committee Input for further development with the Technical Committee. The group drafted initial revisions for consideration, where the revisions include modifying the current 5.1.2 Removal of Smoke Doors section to incorporate language covering the removing and replacement of assemblies or their components. The title was modified to remove "Smoke Doors," so as not to exclude removed assemblies or components such as hardware and closing mechanisms. Additionally, the group determined that it would be valuable to consider limiting the topic of reused or relocated assemblies or components to doors found in Chapter 6 of NFPA 105.

Meeting Notes

September 18, 2025, 12 – 1:30 pm CDT
Attendees: Karen Bishop, Kurt Roeper, Marilyn Latham-Morgan, Curt Schroeder, Matthew Phillips, Dave Dawdy, Jennifer Sisco
Note Taker: Michael Nicasio

Note to NFPA staff – Believe that this task group should be addressing PI-54, -55, and -56 from NFPA 80 and PI-50, -51 from NFPA 105.

Introduced motivation behind submitted PIs for NFAP 80 (PI-54, -55 -56) and NFPA 105 (PI-51) to attempt to address the notion of reusing listed components within an opening protective for other openings. While not exclusive to hospitals and hotels, these building types were noted as being the most notable to incorporate a practice of reusing listed opening protective components.

Also, it was discussed how there is an observed trend for converting business occupancies into residential occupancies, where during this process, building elements, such as listed fire doors and their components, are removed for potential reuse.

Current PI applies to any opening protective in 80/105, where there were concerns raised as to whether this should apply to products like rolling steel fire doors. After considerations, it was determined to either focus on swinging type fire doors or create language that is generic enough to ensure proper use or prohibited use of reclaimed materials. The current practices in the field seem to be mostly with existing hardware, such as lock and closers on swinging type fire doors.

May want to consider focusing on language that describes what is required for reusing materials, instead of what to prohibit.

Need to consider

Actions:

- Michael Nicasio to review PIs and current language to propose alternate language and share with the task group.

Questions to consider”

- When fire rated assemblies are removed, what are the protocols to allow this to happen?

Meeting Notes

October 21, 2025, 1 – 2:30 pm CDT
Attendees: Marilyn Latham-Morgan, Dave Dawdy, Joe Anderson, Michael Nicasio
Note Taker: Michael Nicasio

Covered various options for proposed revised language based on PIs 54, 55, and 56 of NFPA 80. Concentrated on swinging doors due to concerns surrounding applications to other door types. Proposed recommendation is to establish a CI based on PIs 54, 55, and 56 of NFPA 80 and PIs 50 and 51 of NFPA 105.

TG NAME	Alternate Materials for Swinging Doors and Frames
TG Scope	Evaluate the applicability of the requirements for swinging doors in Chapter 6 in NFPA 80 to alternative building materials, including aluminum and composites. Draft proposed language as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.
TG CHAIR	Justin Hendricks
TG MEMBERS	Hal Kelton, Keith Pardoe, Jayson Karas, Michael Nicasio, Jerry Rice, Brandon McCormick, Marilyn Latham-Morgan, Cesar Lujan, Jason Friedrich*, Matthew Phillips* *Non-committee member

TASK GROUP RECOMMENDATION	
MOTION	Create a First Revision to Section 6.3.1.8.7
REVISION	**6.8.1.8.7** Door assemblies that consist of door leaves or door frames constructed of other materials shall not have clearances greater than 1/8 in. (3.18mm) between the top and vertical edges of doors and meeting stiles of paired doors, unless otherwise permitted in the door frame, door, and latching hardware manufacturers' published listings.
STATEMENT	There are listed fire rated products on the market that do not fit within the other sections of 6.3.1.8 based on their material type, and the revision proposed above is an attempt to provide better guidance for these products. Examples include but are not limited to aluminum and fiberglass doors and door frames as well as thin gauge steel adjustable slip-on drywall door frames.

TG NAME	Rolling Steel Doors – Fusible Links
TG SCOPE	Consider if requirements are required to be added to NFPA 80 to address installations where a single fusible link actuates multiple rolling steel fire doors, the location of fusible links for rolling steel fire doors installed in exterior walls, and installations where there are multiple ceilings or large interstitial spaces above a door. Draft proposed language as necessary. Provide a recommendation to the Technical Committee at the First Draft Meeting.
TG CHAIR	Jerry Rice
TG MEMBERS	David Mount, Curt Schroeder, Joe Anderson, Michael Nicasio, Dave Dawdy

TASK GROUP RECOMMENDATION On scope item related to "installations where there are multiple ceilings or large interstitial spaces above a door."	
MOTION	No action
REVISION	
STATEMENT	Additional research and professional input are needed to make a recommendation to the full committee on the application of fusible link placement when two ceilings are on one or both sides of the wall. Task Group agreed that this topic is common enough and important enough that NFPA 80 should have guidance for this situation. The TG did not feel we had enough time, or varied enough Group expertise, to create an informed opinion or create accurate code.

TASK GROUP RECOMMENDATION On scope item related to "installations where a single fusible link actuates multiple rolling steel fire door."	
MOTION	No action
REVISION	
STATEMENT	For safety reasons and to follow manufacturer's recommendations and testing protocol, NFPA 80 should not allow for a single fusible link to activate multiple doors. No PI was attached to this issue.

TASK GROUP RECOMMENDATION	
MOTION	Create First Revision. (No related PI)
REVISION	**4.7.4.3.2*** Fusible links shall be located at or near the ceiling on each side of the wall per figure 4.7.3.1(a), and at or near the centerline of the opening. **A.4.7.4.3.2** The intent of 4.7.4.3.2 is for fusible links to be installed following the arrangements shown in Figure A.4.7.4.2(a) through Figure A.4.7.4.2(h) indicating placement of at least one fusible link at the ceiling, at the centerline of the opening on both sides of the wall. However, it is recognized that in some buildings conditions such as beams, ductwork, piping, or other elements of general

	construction might prevent installation at the exact centerline location. In such cases, professional judgment should be used to select a suitable alternate location, provided the fusible links remain capable of reliable operation. Alternate locations cannot obstruct exposure to heat or otherwise delay activation. When deviations from centerline placement are necessary, consultation with the Authority Having Jurisdiction (AHJ) is recommended.
STATEMENT	Update 4.7.4.3.2 to provide guidance on placement of fusible links more in-line with product testing protocols and manufacturer's instructions. The placement of links at or near the centerline of the opening achieves that. The word centerline needed to be added to ensure proper placement.

TASK GROUP RECOMMENDATION	
MOTION	Create a first revision based on PI #59 and #60.
REVISION	**[NEW] 4.7.4.3.2.1** For interior or exterior mounted fire doors on exterior walls, fusible links shall not be required on the exterior side of the wall unless otherwise instructed by the AHJ.
STATEMENT	Proposed language addition to clarify the standard practice for the application of fire door assemblies mounted on the interior or exterior sides of an exterior wall. 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 to close. 4.7.4.3.2 Fusible links shall be located at or near the ceiling on each side of the wall. The requirements detailed in 4.7.4.2 and 4.7.4.3.2 create confusion during an installation of a fire door assembly interior and exterior mounted to an exterior wall as there is most often no ceiling on the exterior side of the opening, causing undo delays, and questions to the manufacturer who have no choice but to place the responsibility on the AHJ. The proposed language (4.7.4.3.2.1) names the specific application specifying that fusible links are not required on the exterior side of the wall unless otherwise instructed by the AHJ.