



Public Comment No. 32-NFPA 80-2023 [Section No. 3.3.86.2]

3.3.86.2 Label Service.

A program that allows facilities authorized by a listing agency to produce or further process labeled products or materials.

A program under a certification structure of a listing agency allowing a business entity under license and subject to periodic audit to manufacture or further process and *label* listed products or assemblies.

Statement of Problem and Substantiation for Public Comment

The First Draft definition identifies a 'facility' as being authorized, when in fact it is a business entity which has a contractual relationship with the listing agency. The suggested revision corrects this, and also stipulates that a certification structure and periodic auditing are part of the program.

Related Item

- definition of Label Service

Submitter Information Verification

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Submittal Date: Wed May 31 11:35:53 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: [SR-28-NFPA 80-2023](#)
Statement: The first revision created a definition for a term that was used and previously undefined. The second revision has refined the definition to more closely align with the contractual agreements of the business entities involved with this service.



Public Comment No. 14-NFPA 80-2023 [Section No. 3.3.131]

3.3.131 Trained Fire Protective Curtain Assembly Technician.

A technician employed in the fire protective curtain industry with documented training ~~by a recognized industry organization~~ from their employer, a fire protective curtain industry association, or by a manufacturer of a listed fire protective curtain assembly, that is acceptable to the AHJ.

Statement of Problem and Substantiation for Public Comment

Need to ensure the personnel that perform inspection and testing of these complicated assemblies have sufficient knowledge, understanding and training to ensure the product works as intended during a fire event.

Related Item

- FR 42 • FR 34

Submitter Information Verification

Submitter Full Name: Jerry Rice

Organization: DH Pace Company Inc.

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Submittal Date: Tue May 23 13:36:28 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: There is concern over the lack of consistency in qualifications or level of training that technicians might receive from an employer. Requiring AHJ acceptance would be adding a requirement to a definition which is not permitted by the NFPA Manual of Style.



Public Comment No. 9-NFPA 80-2023 [Section No. 3.3.131]

3.3.131 Trained Fire Protective Curtain Assembly Technician.

A technician employed in the fire protective curtain industry with documented training by a recognized industry organization or by a manufacturer of a listed fire protective curtain assembly.

3.3.131

~~A technician employed in the fire protective curtain industry with documented training by a recognized industry organization or by a manufacturer of a listed fire protective curtain assembly.~~

Statement of Problem and Substantiation for Public Comment

This new definition should be deleted and all of the sections such as 21.3.2, and 21.8.1 should continue to use the definition of a “qualified person” as described in 3.3.99 for the following reasons:

1. If there is an issue with finding a “qualified person” for this opening protective then what about all the other opening protectives in the scope of NFPA 80?
2. If the definition of a “qualified person” is not sufficient to establish a person with the necessary training, then there is a problem with more than just protective curtain assemblies. This should be addressed for all protective openings if there exist a problem.
3. What is the data to support the assertion that there are “some people that are not trained sufficiently”? If this is the issue, then that untrained person is not a “qualified person” and does not meet the existing definition of a “qualified person”.

Related Item

- First Revision No. 42-NFPA 80-2022 [Global Input]

Submitter Information Verification

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Organization: Health Facility Consulting, LLC

Affiliation: On behalf of the Codes and Standards Review Committee of the Health Care Section of NFPA

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Submittal Date: Sat May 20 17:27:01 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Accepted

Resolution: SR-17-NFPA 80-2023

Statement: This definition does not comply with the 2022 ANSI/NFPA Patent Policy & Commercial Terms and Conditions, section 3.2 which indicates "an ANS shall not... endorse or require the use of particular... training organizations." Upon notification from NFPA staff of the clause in the Commercial Terms and Conditions the committee has decided to remove this definition from the standard.

Additionally, the definition references "recognized industry organization" which is not defined. The definition also introduces the possibility to restrain trade within the industry by limiting who is permitted to inspect and service these types of doors. With this definition removed, qualifications will default to the defined term "qualified person". This would put the responsibility back on the AHJ to make determinations on the qualifications of person conducting these services.



Public Comment No. 18-NFPA 80-2023 [Section No. 3.3.132]

3.3.132 Trained Rolling Steel Fire Door Systems Technician.

A technician employed in the rolling steel fire door industry with documented training ~~by a recognized industry organization or by~~ from their employer, a rolling steel fire door industry association, or by a manufacturer of a listed rolling steel fire door that is acceptable to the AHJ .

Statement of Problem and Substantiation for Public Comment

Personnel are performing inspections and testing of very large and heavy rolling doors. Injuries and accidents may occur as well as the door may not operate as intended during a fire event.

Related Item

- FR 34 • FR 42

Submitter Information Verification

Submitter Full Name: Jerry Rice

Organization: DH Pace Company Inc.

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Submittal Date: Tue May 23 14:50:02 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-18-NFPA 80-2023

Statement: This definition does not comply with the 2022 ANSI/NFPA Patent Policy & Commercial Terms and Conditions, section 3.2 which indicates "an ANS shall not... endorse or require the use of particular... training organizations." Upon notification from NFPA staff of the clause in the Commercial Terms and Conditions the committee has decided to remove this definition from the standard.

The changes proposed by the public comment are a step in the right direction but do not fully address the concerns with compliance with the 2022 ANSI/NFPA Patent Policy & Commercial Terms and Conditions, section 3.2.



Public Comment No. 21-NFPA 80-2023 [Section No. 4.7.4.2]

4.7.4.2*

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

Statement of Problem and Substantiation for Public Comment

Installers and service technicians frequently ask if fusible links are necessary when electrical smoke or heat detectors are used. The use of detectors accomplishes the desired result of creating detection on each side of the opening without requiring fusible links on either side. The use of electrical detectors meets the requirement of failsafe activation and renders the additional use of fusible links redundant and unnecessary. Example: a UL 1784 smoke gasketed fire door must be activated by electric detectors, not by fusible links. In this common instance, fusible links are not useful or required. This revision adds clarity to 4.7.4.2 as well as 4.7.3.2.

Related Item

- There is no related item, this was overlooked in the initial review.

Submitter Information Verification

Submitter Full Name: David Dawdy

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Submittal Date: Fri May 26 09:10:06 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: This is new material. This public comment is putting requirements for detectors under the section for fusible links and create potential conflict with the requirements in NFPA 72 for placement of smoke detection used for control of doors.



Public Comment No. 27-NFPA 80-2023 [New Section after 5.1.3]

5.1.4 Field labeling

5.1.4.1 Field labeling has been a historically established practice. While the committees are developing Professional Qualifications and assessing training requirements, the AHJ retains the authority to accept or recognize labeling organizations and to continue to allow for field labeling.

5.1.4.2 Previously accepted work remains valid at the discretion of the AHJ.

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Statement of Problem and Substantiation for Public Comment

Deleting this section entirely creates a void and confusion as to the acceptability of long established practice of field labeling by previously authorized agencies.

Related Item

- Comment on actions taken in the First Draft

Submitter Information Verification

Submitter Full Name: Patrick Rothwell
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City:
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Submission Date: Tue May 30 14:18:50 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: This public comment does not include proposed text including wording to be added, revised, or deleted as required by the Regulations governing the development of NFPA Standards 4.4.4.3(c). There is general agreement that improvement in the area of training would make the program stronger, and that there needs to be a minimum “body of knowledge” for inspection to apply field labels. A training program for this would be one method to disseminate this body of knowledge, however such training programs do not currently exist. There is a task group that is currently drafting a new project form for a professional qualification standard to address the minimum job performance requirements for persons conducting field labeling. The technical committee is standing by their first draft actions. See the first draft report for substantiation on the removal of the field labeling requirements.



Public Comment No. 33-NFPA 80-2023 [New Section after 5.1.4]

Field Labeling

5.1.4 Field Labeling

5.1.4.1

Field labeling shall be performed only by individuals or companies that have been certified or listed, or by individuals or companies that are representatives of a labeling service that maintains periodic inspections of production of labeled equipment or materials and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

5.1.4.2

Individuals performing the service shall provide proof of qualifications to the authority having jurisdiction prior to performing work, as described in 5.1.4.1

5.1.4.3

At a minimum, field labels shall contain the following information:

- (1) The words "field inspected" or "field labeled"
- (2) The words "fire door" or "fire door frame"
- (3) The marking of a third party certification agency
- (4) The fire protection rating
- (5) A unique serial number (if provided by the listing agency)
- (6) The fire test standard designation to which the assembly was tested

5.1.4 Modifications.

Modifications to fire doors shall comply with 5.1.4.1 except as permitted by 5.1.4.2.

5.1.4.1 * Field Modifications.

5.1.4.1.1

In cases where a field modification to a fire door or a fire door assembly is desired, the laboratory with which the product or component being modified is listed shall be contacted through the manufacturer and a written or graphic description of the modifications shall be presented to that laboratory.

5.1.4.1.2

Field modifications shall be permitted without a field visit from the laboratory upon written authorization from that laboratory.

5.1.4.1.3

When the manufacturer is no longer available, the laboratory shall be permitted to provide an engineering evaluation supporting the field modification.

5.1.4.2 Job Site Preparation.

5.1.4.2.1

Preparation of fire door assemblies for locks, latches, hinges, remotely operated or remotely monitored hardware, concealed closers, glass lights, vision panels, louvers, astragals, and split astragals and the application of plant-ons and laminated overlays shall be performed in accordance with the manufacturer's inspection service procedure and under label service. (See Annex E and Annex F.)

5.1.4.2.2*

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 $\frac{3}{4}$ in. (19 mm) wood and composite door undercutting
- (3) Installation of protection plates (see 6.4.5)

5.1.4.2.2.1

Surface-applied hardware shall be applied to the door or frame without removing material other than drilling round holes to accommodate cylinders, spindles, similar operational elements, electrified hardware, and through-bolts in doors.

5.1.4.2.2.2

The holes described in 5.1.4.2.2.1 shall not exceed a diameter of 1 in. (25.4 mm), except holes for cylinders, unless otherwise permitted by 5.1.4.2.2.3.

5.1.4.2.2.3

Holes exceeding a diameter of 1 in. (25.4 mm) shall be permitted for surface-applied hardware installed in accordance with the door manufacturer's listing and the hardware manufacturer's listing.

5.1.4.2.2.4

When performed at the job site, drilling raceways for wires or preparation for fire pins shall be in accordance with the door manufacturer's listing and when permitted by the laboratory with which the door is listed.

5.1.4.2.2.5

Where the door manufacturer's listing does not contain provisions for drilling raceways, the raceways shall be considered field modifications in accordance with 5.1.4.1.

Statement of Problem and Substantiation for Public Comment

The removal of 5.1.4 Field Labeling (specifically sections 5.1.4.1, 5.1.4.2 & 5.1.4.3) discards guidance on the established practice of Field Labeling by both Testing Laboratories that actively Field Label, as well as Accredited Inspection Bodies that Inspect and Field Label.

The effect of this on the standard is that no Field Labeling may occur, by Manufacturers, Testing Laboratories or Inspection Bodies, as this is not addressed in section 4.2.1 (specifically sections 4.2.1.1 through 4.2.1.5). An entire industry would be negatively impacted, and lives would be put at risk. The removal of this section would also create significant additional expense for building owners, as they would no longer have the option of having existing assemblies inspected instead of replaced. Furthermore, the Authorities Having Jurisdiction (AHJ's) would interpret the lack of this provision in

many different ways, further creating chaos in the industry where there was none before.

The accredited companies that currently provide field labeling are required to provide relevant training to conduct this task. There is general agreement that improvement in the area of training would make the program stronger, and that there needs to be a minimum “body of knowledge” for inspection to apply field labels. A training program for this would be one method to disseminate this body of knowledge. There is a task group working on this.

However, removing 5.1.4 pending implementation of a training program which may or may not be recognized by the industry and regulators, effectively stops all Field Labeling Activities by any party. Section 5.1.4 should not be removed at this time.

Related Item

- Second Draft Report

Submitter Information Verification

Submitter Full Name: Paul Matera
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Submittal Date: Wed May 31 12:21:57 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: There is general agreement that improvement in the area of training would make the program stronger, and that there needs to be a minimum “body of knowledge” for inspection to apply field labels. A training program for this would be one method to disseminate this body of knowledge, however such training programs do not currently exist. There is a task group that is currently drafting a new project form for a professional qualification standard to address the minimum job performance requirements for persons conducting field labeling. The technical committee is standing by their first draft actions. See the first draft report for substantiation on the removal of the field labeling requirements.



Public Comment No. 22-NFPA 80-2023 [Section No. 5.1.4]

5.1.4 Field Labeling

5.1.4.1

Field labeling shall be performed only by individuals or companies that have been certified or listed, or by individuals or companies that are representatives of a labeling service that maintains periodic inspections of production of labeled equipment or materials and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

5.1.4.2

Individuals performing the service shall provide proof of qualifications to the authority having jurisdiction prior to performing work, as described in 5.1.4.1

5.1.4.3

At a minimum, field labels shall contain the following information:

- (1) The words "field inspected" or "field labeled"
- (2) The words "fire door" or "fire door frame"
- (3) The marking of a third party certification agency
- (4) The fire protection rating
- (5) A unique serial number (if provided by the listing agency)
- (6) The fire test standard designation to which the assembly was tested

5.1.4 Modifications.

Modifications to fire doors shall comply with 5.1.4.1 except as permitted by 5.1.4.2.

5.1.4.1* Field Modifications.

5.1.4.1.1

In cases where a field modification to a fire door or a fire door assembly is desired, the laboratory with which the product or component being modified is listed shall be contacted through the manufacturer and a written or graphic description of the modifications shall be presented to that laboratory.

5.1.4.1.2

Field modifications shall be permitted without a field visit from the laboratory upon written authorization from that laboratory.

5.1.4.1.3

When the manufacturer is no longer available, the laboratory shall be permitted to provide an engineering evaluation supporting the field modification.

5.1.4.2 Job Site Preparation.

5.1.4.2.1

Preparation of fire door assemblies for locks, latches, hinges, remotely operated or remotely monitored hardware, concealed closers, glass lights, vision panels, louvers, astragals, and split astragals and the application of plant-ons and laminated overlays shall be performed in accordance with the manufacturer's inspection service procedure and under label service. (See *Annex E and Annex F*.)

5.1.4.2.2*

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 $\frac{3}{4}$ in. (19 mm) wood and composite door undercutting
- (3) Installation of protection plates (see 6.4.5)

5.1.4.2.2.1

Surface-applied hardware shall be applied to the door or frame without removing material other than drilling round holes to accommodate cylinders, spindles, similar operational elements, electrified hardware, and through-bolts in doors.

5.1.4.2.2.2

The holes described in 5.1.4.2.2.1 shall not exceed a diameter of 1 in. (25.4 mm), except holes for cylinders, unless otherwise permitted by 5.1.4.2.2.3.

5.1.4.2.2.3

Holes exceeding a diameter of 1 in. (25.4 mm) shall be permitted for surface-applied hardware installed in accordance with the door manufacturer's listing and the hardware manufacturer's listing.

5.1.4.2.2.4

When performed at the job site, drilling raceways for wires or preparation for fire pins shall be in accordance with the door manufacturer's listing and when permitted by the laboratory with which the door is listed.

5.1.4.2.2.5

Where the door manufacturer's listing does not contain provisions for drilling raceways, the raceways shall be considered field modifications in accordance with 5.1.4.1.

Statement of Problem and Substantiation for Public Comment

The removal of 5.1.4 Field Labeling (specifically sections 5.1.4.1, 5.1.4.2 & 5.1.4.3) discards guidance on the established practice of Field Labeling by both Testing Laboratories that actively Field Label, as well as Accredited Bodies that Inspect and Field Label.

The effect of this on the standard is that no Field Labeling may occur, by Manufacturers, Testing Laboratories or Inspection Bodies, as this is not addressed in section 4.2.1 (specifically sections 4.2.1.1 through 4.2.1.5)

There is general agreement that there needs to be a minimum "body of knowledge" for inspection to apply field labels, there is a task group working on this. A training program for this would be one method to disseminate this body of knowledge.

Removing 5.1.4 pending implementation of a training program which may or may not be recognized by the industry and regulators, effectively stops all Field Labeling Activities by any party.

Section 5.1.4 should not be removed at this time.

Related Item

- Second Draft Report

Submitter Information Verification

Submitter Full Name: David Feist

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City:

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Submittal Date: Fri May 26 12:18:40 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: There is general agreement that improvement in the area of training would make the program stronger, and that there needs to be a minimum "body of knowledge" for inspection to apply field labels. A training program for this would be one method to disseminate this body of knowledge, however such training programs do not currently exist. There is a task group that is currently drafting a new project form for a professional qualification standard to address the minimum job performance requirements for persons conducting field labeling. The technical committee is standing by their first draft actions. See the first draft report for substantiation on the removal of the field labeling requirements.



Public Comment No. 52-NFPA 80-2023 [Section No. 5.1.4]

5.1.4 Modifications.

Modifications to fire doors shall comply with 5.1.4.1 except as permitted by 5.1.4.2.

5.1.4.1* Field Modifications.

5.1.4.1.1

In cases where a field modification to a fire door or a fire door assembly is desired, the laboratory with which the product or component being modified is listed shall be contacted through the manufacturer and a written or graphic description of the modifications shall be presented to that laboratory.

5.1.4.1.2

Field modifications shall be permitted without a field visit from the laboratory upon written authorization from that laboratory.

5.1.4.1.3

When the manufacturer is no longer available, the laboratory shall be permitted to provide an engineering evaluation supporting the field modification.

5.1.4.2 Job Site Preparation.

5.1.4.2.1

Preparation of fire door assemblies for locks, latches, hinges, remotely operated or remotely monitored hardware, concealed closers, glass lights, vision panels, louvers, astragals, and split astragals and the application of plant-ons and laminated overlays shall be performed in accordance with the manufacturer's inspection service procedure and under label service. (See *Annex E and Annex F.*)

5.1.4.2.2*

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 $\frac{3}{4}$ in. (19 mm) wood and composite door undercutting
- (3) Installation of protection plates (see 6.4.5)

5.1.4.2.2.1

Surface-applied hardware shall be applied to the door or frame without removing material other than drilling round holes to accommodate cylinders, spindles, similar operational elements, electrified hardware, and through-bolts in doors.

5.1.4.2.2.2

The holes described in 5.1.4.2.2.1 shall not exceed a diameter of 1 in. (25.4 mm), except holes for cylinders, unless otherwise permitted by 5.1.4.2.2.3.

5.1.4.2.2.3

Holes exceeding a diameter of 1 in. (25.4 mm) shall be permitted for surface-applied hardware installed in accordance with the door manufacturer's listing and the hardware manufacturer's listing.

5.1.4.2.2.4

When performed at the job site, drilling raceways for wires or preparation for fire pins shall be in accordance with the door manufacturer's listing and when permitted by the laboratory with which the door is listed.

5.1.4.2.2.5

Where the door manufacturer's listing does not contain provisions for drilling raceways, the raceways shall be considered field modifications in accordance with 5.1.4.1.

Statement of Problem and Substantiation for Public Comment**5.1.4 Field Labeling**

My request of the committee is to leave the language in NFPA 80 section 5.1.4 in the 2022 version as is for the 2025 version with the addition of the education minimum of an accredited fire door inspector. Shop and field labeling are essential services to the Division 8 industry. Shop labeling is available locally through distributors that are certified through the listing agency. AHJs, building owners, facility managers, distributors and factories all need a competitive and local option to have a product field labeled. Currently there is an ISO 17020 accredited program available for field inspection and labeling. There are available education courses and an accredited inspection certification program offered. Leaving in 5.1.4 as stated in NFPA80 2022 edition is what is needed for the industry. The education minimum should be the qualifier must hold a certificate for a fire door inspector from an accredited course. The program used should be an accredited ISO 17020 program. The need in new construction is for missing labels from the factory or distributor or a label that has been compromised in the field. This product has a clear chain of custody and is easily identifiable. On existing facility conditions, missing and compromised labels appear on a regular basis. The traceability of the label is possible in many cases while others may require more field work that is limited to using a comparable product. I have personally witnessed hospitals under extreme financial distress tear out concrete filled hollow metal frames and replace them with labeled bolted in hollow metal frames. Most commonly in this situation, the facility receives a similar product to what exists. It also costs the hospital a minimum of \$3,000 per opening while causing damage to surrounding surfaces. All in all, field labeling is an essential part of the division 8 industry and it should have a competitive and local option for the industry.

Related Item

- NFPA 80 2nd Draft

Submitter Information Verification

Submitter Full Name: Joe Hood

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Submittal Date: Wed May 31 16:21:11 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: There is general agreement that improvement in the area of training would make the program stronger, and that there needs to be a minimum "body of knowledge" for inspection to apply field labels. A training program for this would be one method to disseminate this body of knowledge, however such training programs do not currently

exist. There is a task group that is currently drafting a new project form for a professional qualification standard to address the minimum job performance requirements for persons conducting field labeling. The technical committee is standing by their first draft actions. See the first draft report for substantiation on the removal of the field labeling requirements.



Public Comment No. 53-NFPA 80-2023 [Section No. 5.1.4]

5.1.4 Modifications.

Modifications to fire doors shall comply with 5.1.4.1 except as permitted by 5.1.4.2.

5.1.4.1* Field Modifications.

5.1.4.1.1

In cases where a field modification to a fire door or a fire door assembly is desired, the laboratory with which the product or component being modified is listed shall be contacted through the manufacturer and a written or graphic description of the modifications shall be presented to that laboratory.

5.1.4.1.2

Field modifications shall be permitted without a field visit from the laboratory upon written authorization from that laboratory.

5.1.4.1.3

When the manufacturer is no longer available, the laboratory shall be permitted to provide an engineering evaluation supporting the field modification.

5.1.4.2 Job Site Preparation.

5.1.4.2.1

Preparation of fire door assemblies for locks, latches, hinges, remotely operated or remotely monitored hardware, concealed closers, glass lights, vision panels, louvers, astragals, and split astragals and the application of plant-ons and laminated overlays shall be performed in accordance with the manufacturer's inspection service procedure and under label service. (See *Annex E and Annex F.*)

5.1.4.2.2*

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 $\frac{3}{4}$ in. (19 mm) wood and composite door undercutting
- (3) Installation of protection plates (see 6.4.5)

5.1.4.2.2.1

Surface-applied hardware shall be applied to the door or frame without removing material other than drilling round holes to accommodate cylinders, spindles, similar operational elements, electrified hardware, and through-bolts in doors.

5.1.4.2.2.2

The holes described in 5.1.4.2.2.1 shall not exceed a diameter of 1 in. (25.4 mm), except holes for cylinders, unless otherwise permitted by 5.1.4.2.2.3.

5.1.4.2.2.3

Holes exceeding a diameter of 1 in. (25.4 mm) shall be permitted for surface-applied hardware installed in accordance with the door manufacturer's listing and the hardware manufacturer's listing.

5.1.4.2.2.4

When performed at the job site, drilling raceways for wires or preparation for fire pins shall be in accordance with the door manufacturer's listing and when permitted by the laboratory with which the door is listed.

5.1.4.2.2.5

Where the door manufacturer's listing does not contain provisions for drilling raceways, the raceways shall be considered field modifications in accordance with 5.1.4.1.

Statement of Problem and Substantiation for Public Comment

5.1.4 Field Labeling

My request of the committee is to leave the language in NFPA 80 section 5.1.4 in the 2022 version as is for the 2025 version with the addition of the education minimum of an accredited fire door inspector. Shop and field labeling are essential services to the Division 8 industry. Shop labeling is available locally through distributors that are certified through the listing agency. AHJs, building owners, facility managers, distributors and factories all need a competitive and local option to have a product field labeled. Currently there is an ISO 17020 accredited program available for field inspection and labeling. There are available education courses and an accredited inspection certification program offered. Leaving in 5.1.4 as stated in NFPA80 2022 edition is what is needed for the industry. The education minimum should be the qualifier must hold a certificate for a fire door inspector from an accredited course. The program used should be an accredited ISO 17020 program. The need in new construction is for missing labels from the factory or distributor or a label that has been compromised in the field. This product has a clear chain of custody and is easily identifiable. On existing facility conditions, missing and compromised labels appear on a regular basis. The traceability of the label is possible in many cases while others may require more field work that is limited to using a comparable product. I have personally witnessed hospitals under extreme financial distress tear out concrete filled hollow metal frames and replace them with labeled bolted in hollow metal frames. Most commonly in this situation, the facility receives a similar product to what exists. It also costs the hospital a minimum of \$3,000 per opening while causing damage to surrounding surfaces. All in all, field labeling is an essential part of the division 8 industry and it should have a competitive and local option for the industry.

Related Item

- NFPA 80 2nd Draft

Submitter Information Verification

Submitter Full Name: Jerry Himmel

Organization: Himmel's Architectural Door and Hardware

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Submittal Date: Wed May 31 16:35:01 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: This public comment does not include proposed text including wording to be added, revised, or deleted as required by the Regulations governing the development of NFPA Standards 4.4.4.3(c). There is general agreement that improvement in the area of training would make the program stronger, and that there needs to be a minimum "body

of knowledge” for inspection to apply field labels. A training program for this would be one method to disseminate this body of knowledge, however such training programs do not currently exist. There is a task group that is currently drafting a new project form for a professional qualification standard to address the minimum job performance requirements for persons conducting field labeling. The technical committee is standing by their first draft actions. See the first draft report for substantiation on the removal of the field labeling requirements.



Public Comment No. 8-NFPA 80-2023 [Section No. 5.1.4.1]

5.1.4.1* Field Modifications.

5.1.4.1.1

In cases where a field modification to a fire door or a fire door assembly is desired, the laboratory with which the product or component being modified is listed shall be contacted through the manufacturer and a written or graphic description of the modifications shall be presented to that laboratory.

5.1.4.1.2

Field modifications shall be permitted without a field visit from the laboratory upon written authorization from that laboratory.

5.1.4.1.3

When the manufacturer is no longer available, the laboratory shall be permitted to provide an engineering evaluation supporting the field modification.

5.1.4 Field Labeling.

5.1.4.1

Field labeling shall be performed only by individuals or companies that have been certified or listed, or by individuals or companies that are representatives of a labeling service that maintains periodic inspections of production of labeled equipment or materials and by whose labeling the manufacturer indicates compliance with appropriate standards or performance in a specified manner.

5.1.4.2

Individuals performing the service shall provide proof of qualifications to the authority having jurisdiction prior to performing work, as described in 5.1.4.1.

5.1.4.3

At a minimum, field labels shall contain the following information:

1. The words "field inspected" or "field labeled"
2. The words "fire door" or "fire door frame"
3. The marking of a third-party certification agency.
4. The fire protection rating
5. A unique serial number (if provided by the listing agency)
6. The fire test standard designation to which the assembly was tested

5.1.4.4

Field modifications shall not be permitted to be made to a non-fire-rated door assembly to achieve a fire rating unless the field modification is completed under label service.

5.1.4.5

Doors in which a field modification in accordance with 5.1.4.4 has been completed shall be labeled.

5.1.4.6

When an opening with a non-fire-rated door requires a fire door, the door assembly shall be replaced.

Statement of Problem and Substantiation for Public Comment

Comment:

Retain the language for field labeling in the current edition of NFPA 80. There have been no issues shown to be a problem with the existing language. If there are issues that can be clearly identified with supporting data, then revise this section to address those issues.

But do not delete the entire section just because there is a lacking of agreement how to revised it. To delete it in its entirety for one code edition does not provide the user with any correction except to purchase a new product that results in a financial hardship with no fire safety improvement.

**Related
Item**

- First Revision No. 11-NFPA 80-2022 [Section No. 5.1.4] Public Input No. 48-NFPA 80-2022 [Section No. 5.1.4]

Submitter Information Verification

Submitter Full Name: James Gregory

Organization: Health Facility Consulting, LLC

Affiliation: On behalf of the Codes and Standards Review Committee of the Health Care Section of NFPA

Street Address:

City:

State:

Zip:

Submittal Date: Sat May 20 17:09:37 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: There is general agreement that improvement in the area of training would make the program stronger, and that there needs to be a minimum “body of knowledge” for inspection to apply field labels. A training program for this would be one method to disseminate this body of knowledge, however such training programs do not currently exist. There is a task group that is currently drafting a new project form for a professional qualification standard to address the minimum job performance requirements for persons conducting field labeling. The technical committee is standing by their first draft actions. See the first draft report for substantiation on the removal of the field labeling requirements.



Public Comment No. 34-NFPA 80-2023 [New Section after 5.2.3.1]

5.2.3.1.1*

For doors complying with Chapter 9, acceptance testing shall be performed by a qualified person in accordance with the manufacturer's certification requirements.

Statement of Problem and Substantiation for Public Comment

NFPA80 criteria for the Inspection, Testing, and Maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa
Organization: Door Services Corporation
Affiliation: Won-Door
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 31 12:39:23 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-29-NFPA 80-2023
Statement: It is imperative for the proper function of these types of doors that they are tested in accordance with the manufacturer's installation instructions by personnel that are trained on the testing and operation of these doors.

The annex section was removed due to violation with the NFPA Commercial Terms and Conditions Policy section 3.2



Public Comment No. 37-NFPA 80-2023 [New Section after 5.2.3.9]

5.2.3.10

Special-Purpose Horizontally Sliding Accordion or Folding Doors

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa
Organization: Door Services Corporation
Affiliation: Won-Door
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 31 13:02:45 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-30-NFPA 80-2023
Statement: Chapter 9 doors are a unique type of opening protective and do not currently have their own inspection criteria. These criteria are provided to ensure that these types of door are properly inspected and tested.



Public Comment No. 39-NFPA 80-2023 [New Section after 5.2.3.9]

5.2.3.10.1

Fire door assemblies shall be visually inspected from both sides to assess the overall condition of door assembly.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa

Organization: Door Services Corporation

Affiliation: Won-Door

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 31 13:15:18 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-30-NFPA 80-2023

Statement: Chapter 9 doors are a unique type of opening protective and do not currently have their own inspection criteria. These criteria are provided to ensure that these types of door are properly inspected and tested.



Public Comment No. 40-NFPA 80-2023 [New Section after 5.2.3.9]

5.2.3.10.2

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 the door or assembly.
- (3) Glazing, vision light frames, and glazing beads are intact and securely fastened in place, if so equipped.
- (4) Components of the assembly, including door, fire exit hardware, jambs, lintels, smoke seals, and track(s) are secured, mounted, aligned, and in working order with no visible signs of damage as listed in **9.1.4.1**, **9.1.4.3***, **9.1.4.4**, **9.2.3.3**
- (5) Clearances at the lintel, jambs, and meeting stiles do not exceed clearances listed in **4.8.4** and **9.3***.
- (6) All track assembly components are unobstructed and operating freely.
- (7) The door control key switch is operational, if so equipped.
- (8) A full visual and functional test is performed on the logic board, obstruction device, and power source, resulting in door assembly operational and unobstructed as per individual manufacturer's published listing.
- (9) The self-closing or automatic-closing device is operational; that is, the active door shall not have a delay in the initiation of opening or closing and the door shall fully close and seal the opening.
- (10) The average closing speed shall be not less than 6 in./sec (152 mm/sec) or more than 24 in./sec (610 mm/sec) as listed in **9.4.1.3**.
- (11) No field modifications to the door assembly have been performed that void the label.
- (12) Auxiliary hardware items that interfere or prohibit operation are not installed on the door assembly.
- (13) Fire exit hardware operates according to individual manufacturer's published listing.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa
Organization: Door Services Corporation
Affiliation: Won-Door
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 31 13:23:34 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-30-NFPA 80-2023
Statement: Chapter 9 doors are a unique type of opening protective and do not currently have their own inspection criteria. These criteria are provided to ensure that these types of door are properly inspected and tested.



Public Comment No. 41-NFPA 80-2023 [New Section after 5.2.3.9]

5.2.3.10.3

Door shall be self-closing or automatic-closing and function without delay as listed in 9.4.1.2 .

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa
Organization: Door Services Corporation
Affiliation: Won-Door
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 31 14:50:12 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-30-NFPA 80-2023
Statement: Chapter 9 doors are a unique type of opening protective and do not currently have their own inspection criteria. These criteria are provided to ensure that these types of door are properly inspected and tested.



Public Comment No. 43-NFPA 80-2023 [New Section after 5.2.3.9]

5.2.3.10.4

Power operated door assembly shall be functionally tested through two complete cycles without error, as per individual manufacturer's listing.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa

Organization: Door Services Corporation

Affiliation: Won-Door

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 31 15:02:00 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-30-NFPA 80-2023

Statement: Chapter 9 doors are a unique type of opening protective and do not currently have their own inspection criteria. These criteria are provided to ensure that these types of door are properly inspected and tested.



Public Comment No. 45-NFPA 80-2023 [New Section after 5.2.3.9]

5.2.3.10.5

The first functional test cycle shall be performed to check for full closure operation and proper sealing, as per individual manufacturer's listing.

5.2.3.10.5.1

Single door assemblies shall close against a strike jamb at adjacent wall, as listed in 9.1.4.3*.

5.2.3.10.5.2

Bi-parting door assemblies shall close together at meeting stiles, as listed in 9.1.4.3.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa

Organization: Door Services Corporation

Affiliation: Won-Door

Street Address:

City:

State:

Zip:

Submission Date: Wed May 31 15:26:52 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-30-NFPA 80-2023

Statement: Chapter 9 doors are a unique type of opening protective and do not currently have their own inspection criteria. These criteria are provided to ensure that these types of door are properly inspected and tested.



Public Comment No. 46-NFPA 80-2023 [New Section after 5.2.3.9]

5.2.3.10.6

A second functional test cycle shall be performed to verify the power operated device has been reset correctly, as per individual manufacturer's listing.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa
Organization: Door Services Corporation
Affiliation: Won-Door
Street Address:
City:
State:
Zip:
Submission Date: Wed May 31 15:28:48 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-30-NFPA 80-2023
Statement: Chapter 9 doors are a unique type of opening protective and do not currently have their own inspection criteria. These criteria are provided to ensure that these types of door are properly inspected and tested.



Public Comment No. 28-NFPA 80-2023 [New Section after 5.2.4.2]

5.2.4.2.1*

For doors complying with Chapter 9, periodic inspections and testing shall be performed by a qualified person in accordance with the manufacturer's certification requirements.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for the Inspection, Testing, and Maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa

Organization: Door Services Corporation

Affiliation: Won-Door

Street Address:

City:

State:

Zip:

Submittal Date: Tue May 30 15:46:38 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-31-NFPA 80-2023](#)

Statement: It is imperative for the proper function of these types of doors that they are tested in accordance with the manufacturer's installation instructions by personnel that are trained on the testing and operation of these doors.

The annex section was removed due to violation with the NFPA Commercial Terms and Conditions Policy section 3.2



Public Comment No. 16-NFPA 80-2023 [New Section after 5.2.4.3]

5.2.4.3

For doors complying with Chapter 21, periodic inspections and testing shall be performed by a trained fire protective curtain assembly technician.

Annex note similar to A.5.2.4.2 may be needed. Also, if we start adding this citation for all types of doors, then Chapter 5 becomes too busy. May want a pointer here that goes to each product chapter.

Statement of Problem and Substantiation for Public Comment

Ensure inspections and testing are performed by personnel that are properly trained.

Related Item

- FR 42

Submitter Information Verification

Submitter Full Name: Jerry Rice

Organization: DH Pace Company Inc.

Street Address:

City:

State:

Zip:

Submittal Date: Tue May 23 14:33:04 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: Chapter 21 doors are outside the scope of Chapter 5 and the concerns of the submitter appear to be addressed in the existing section 21.8.1.



Public Comment No. 15-NFPA 80-2023 [New Section after 5.5.10.3]

5.5.10.4

For doors complying with Chapter 21, repairs shall be made by a trained fire protective curtain assembly technician.

Statement of Problem and Substantiation for Public Comment

Not properly trained personnel performing repairs this product.

Related Item

• FR 42 • FR 34

Submitter Information Verification

Submitter Full Name: Jerry Rice

Organization: DH Pace Company Inc.

Street Address:

City:

State:

Zip:

Submittal Date: Tue May 23 14:23:43 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-19-NFPA 80-2023

Statement: Chapter 21 assemblies are outside the scope of Chapter 5, so these changes were made to the applicable section in Chapter 21.

It is imperative for the proper function of these assemblies that they are repaired by personnel that are trained on the repairs of these assemblies.



Public Comment No. 47-NFPA 80-2023 [New Section after 5.5.10.3]

5.5.10.4

For doors complying with Chapters 9, maintenance or repairs shall be performed by a qualified person in accordance with the manufacturer's certification requirements.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa

Organization: Door Services Corporation

Affiliation: Won-Door

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 31 15:40:08 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-32-NFPA 80-2023](#)

Statement: It is imperative for the proper function of these types of doors that they are maintained and repaired in accordance with the manufacturer's installation instructions by personnel that are trained on the maintenance and repair of these doors.



Public Comment No. 48-NFPA 80-2023 [Section No. 9.1.1.1.2]

9.1.1.1.2

Upon completion of installation, acceptance testing of new door assemblies shall be performed in accordance with 5.2.3. 10

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa

Organization: Door Services Corporation

Affiliation: Won-Door

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 31 15:54:49 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: Changing the cross reference from 5.2.3 to 5.2.3.10 would bypass the general requirements for acceptance testing, including the new provisions added for chapter 9 doors.



Public Comment No. 49-NFPA 80-2023 [Section No. 9.1.1.2]

9.1.1.2 Existing Doors.

Existing door assemblies shall be inspected and tested in accordance with 5.1.1.3, [5.2.3.10](#) and 5.2.4.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa

Organization: Door Services Corporation

Affiliation: Won-Door

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 31 15:57:03 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: This new cross reference would be providing a reference to the requirements for acceptance testing for existing doors. The criteria in 5.2.3.10 should be through applicable references in 5.2.4.



Public Comment No. 50-NFPA 80-2023 [Section No. 9.1.1.3.2]

9.1.1.3.2

Upon completion of maintenance work that affects the operation and performance of the assembly, doors shall be inspected and tested in accordance with 5.2.3.10 and 5.5.10.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa

Organization: Door Services Corporation

Affiliation: Won-Door

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 31 16:02:54 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: The cross reference to 5.5.10 should remain, references to acceptance testing inspection criteria should be through the maintenance requirements where applicable.



Public Comment No. 2-NFPA 80-2023 [Section No. 19.3.4.1.3]

19.3.4.1.3*

~~Where approved by the AHJ, in~~ In existing, fully ducted HVAC systems, periodic testing shall not be required when documented as required by 19.3.4.3 for a single damper that is not accessible within a rated barrier or shaft.

Statement of Problem and Substantiation for Public Comment

If a single damper is inaccessible it is impossible to inspect. Requiring approval from and AHJ for this situation complicates this requirement - what is the AHJ approving? That it is indeed inaccessible? that the documentation has been created? There are better uses of an AHJ's time than to approve these and there was no information or public input that was provided to initiate this change from the previous document that didn't require the AHJ approval. What transpired due to lack of AHJ approval that warranted this committee change? if it wasn't broken, then why try to fix it?

Related Item

- FR-44

Submitter Information Verification

Submitter Full Name: Chad Beebe

Organization: ASHE - AHA

Street Address:

City:

State:

Zip:

Submittal Date: Tue May 09 10:35:50 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-15-NFPA 80-2023](#)

Statement: This clarifies the condition which the AHJ is approving. They are approving the inaccessible designation for a damper. The term "not accessible" was changed to "inaccessible" for consistency.

It is imperative for the AHJ to be involved in the determination of the inaccessible condition. It outside the scope of NFPA 80 to determine who is the AHJ and how they apply the standard.



Public Comment No. 54-NFPA 80-2023 [Section No. 19.3.4.1.3]

19.3.4.1.3*

~~Where approved by the AHJ, in~~ In existing, fully ducted HVAC systems, periodic testing shall not be required when documented as required by 19.3.4.3 for a single damper that is not accessible within a rated barrier or shaft.

Statement of Problem and Substantiation for Public Comment

We have become too reliant on "Where AHJ Approval". As a building owner with multiple AHJs I am not able to use this. Where we struggle in healthcare and hospitals is that I have to seek a variance from the federal government, state department of health, and local fire marshal. This is not feasible and I don't think the intent of adding this to the code

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
Public Comment No. 55-NFPA 80-2023 [Section No. A.19.3.4.1.3]	
<u>Related Item</u>	
• FR44	

Submitter Information Verification

Submitter Full Name: Joshua Brackett
Organization: Banner Health
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 31 19:17:09 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: [SR-15-NFPA 80-2023](#)
Statement: This clarifies the condition which the AHJ is approving. They are approving the inaccessible designation for a damper. The term "not accessible" was changed to "inaccessible" for consistency.

It is imperative for the AHJ to be involved in the determination of the inaccessible condition. It outside the scope of NFPA 80 to determine who is the AHJ and how they apply the standard.



Public Comment No. 7-NFPA 80-2023 [Section No. 19.3.4.1.3]

19.3.4.1.3*

Where approved by the AHJ, in existing, fully ducted HVAC systems, periodic testing shall not be required when documented as required by 19.3.4.3 for a single damper that is not accessible within a rated barrier or shaft.

Where approved. Unless prohibited by the an AHJ, in existing, fully ducted HVAC systems, periodic testing shall not be required when documented as required by 19.3.4.3 for a single damper that is not accessible within a rated barrier or shaft.

Statement of Problem and Substantiation for Public Comment

1. An AHJ will not take responsibility for a damper that is not being periodically tested. An AHJ does not provide approval for systems that do not meet all requirements of the codes and standards. However, if the codes and standards allow a documented existing installation to exist, then the AHJ will not override that exception unless there are factors that indicate the condition does not merit the exception or permission.

2." The AHJ" is revised to "an AHJ" because there may be several different AHJs that survey facilities. This revised language is relevant to any one of the AHJs who might be conducting the survey.

Related Item

• First Revision No. 44-NFPA 80-2022 [Section No. 19.5.1.3] Public Input No. 33-NFPA 80-2022 [Section No. 19.5.1.3]

Submitter Information Verification

Submitter Full Name: James Gregory

Organization: Health Facility Consulting, LLC

Affiliation: On behalf of the Codes and Standards Review Committee of the Health Care Section of NFPA

Street Address:

City:

State:

Zip:

Submittal Date: Sat May 20 16:52:44 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR

Resolution: SR-15-NFPA 80-2023

Statement: This clarifies the condition which the AHJ is approving. They are approving the inaccessible designation for a damper. The term "not accessible" was changed to "inaccessible" for consistency.

It is imperative for the AHJ to be involved in the determination of the inaccessible condition. It outside the scope of NFPA 80 to determine who is the AHJ and how they apply the standard.



Public Comment No. 12-NFPA 80-2023 [Section No. 19.3.4.1.4]

19.3.4.1.4

A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2.

Statement of Problem and Substantiation for Public Comment

This revision is more appropriate under 19.3.4.2.3.3(A)(4), as the intent is to require that a visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third test cycle, including dampers utilizing remote inspection. This intent is representative of the Committee Statement listed in the First Draft Report. Leaving the revision in this section adds confusion, as the frequency is already established in 19.3.4.1.2.

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<u>Public Comment No. 13-NFPA 80-2023 [New Section after 19.3.4.2.3.3(A)]</u>	
<u>Public Comment No. 13-NFPA 80-2023 [New Section after 19.3.4.2.3.3(A)]</u>	
	<u>Related Item</u>
• Public Input No. 51-NFPA 80-2022 [Section No. 19.5.3.2]	• First Revision No. 19-NFPA 80-2022 [New Section after 19.5.1.3]

Submitter Information Verification

Submitter Full Name: Duane Smith
Organization: National Energy Management Ins
Street Address:
City:
State:
Zip:
Submittal Date: Tue May 23 12:22:33 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: [SR-33-NFPA 80-2023](#)
Statement: This revision is more appropriate under 19.3.4.2.3.3(A)(4), as the intent is to require that a visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third test cycle, including dampers utilizing remote inspection.



Public Comment No. 20-NFPA 80-2023 [Section No. 19.3.4.1.4]

19.3.4.1.4 –

A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2 .

Statement of Problem and Substantiation for Public Comment

I am proposing that section 19.3.4.1.4, which was added by First Revision No. 19, be removed thus reverting the language back to the 2022 edition.

Adding this section, which would require every third periodic damper test to be conducted visually, will unnecessarily add significant cost to the process of performing periodic damper testing on dampers eligible to use the remote method.

First Revision 19 was made in response to public input No. 51, which states, "Mechanical devices, such as blade position switches can sometimes indicate that a damper is fully closed when it is not - there are instances where a wire/cable has been installed through the damper which does not allow for it to close fully but enough for the switch to indicate full closure. For this reason, a visual test should be required at regular intervals."

Public Input No. 51 describes a situation that would result in a false positive remote damper test to justify the need for visual tests. However, this exact situation is already accounted for by the standard. Section 19.3.4.2.3.3 "Remote Inspection Method" requires that, prior to using the remote method, an initial visual test must be conducted. Item 3 of section 19.3.4.2.3.3 states that "The visual inspection shall confirm that the position indication method accurately reflects the full-open and full-closed position of the damper.". Thus, the standard already has a mechanism in place to prevent the scenario described in PI No. 51 by rejecting the use of position indication devices that signal that a damper is closed before the damper is actually fully closed.

Remote damper testing using position indication devices that comply with the standard will prevent false positive tests and will safely and cost effectively identify issues with damper performance. Requiring visual tests will reduce the incentive for owners to initially invest in remote testing capabilities, which will lead to fewer dampers being tested.

Related Item

- FR 19 • PI 51

Submitter Information Verification

Submitter Full Name: Marty Gissel

Organization: Greenheck Fan

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 24 09:05:54 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Rejected

Action:

Resolution: The technical committee supports remote inspection, but alterations in buildings should require visual inspection of dampers. Remote testing of dampers is a relatively new concept to NFPA 80 and no data has been provided to the technical committee to support that remote inspection is equivalent to visual inspection over the life span of a damper. These requirements were relocated, see SR-33.



Public Comment No. 23-NFPA 80-2023 [Section No. 19.3.4.1.4]

19.3.4.1.4 –

A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2 .

Statement of Problem and Substantiation for Public Comment

Adding this requirement to increase the number of visual inspections will likely reduce the purpose for adding remote inspections. Currently many motorized life safety dampers do not get inspected except in hospitals. Currently building owners that have motorized life safety dampers with the blade location sensor on them, can easily remote test the dampers once a month, once a year, or once every 4 years as the codes require. Currently, even though required by codes, these dampers do not get inspected. So by leaving the currently language the way it currently is, will allow more dampers to be inspected and more buildings to be safe to occupy.

Related Item

- FR -19-NFPA 80-2022, Public Input No. 51-NFPA 80-2022

Submitter Information Verification

Submitter Full Name: Stephen Carey

Organization: Tamco

Street Address:

City:

State:

Zip:

Submittal Date: Fri May 26 15:06:14 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: The technical committee supports remote inspection, but alterations in buildings should require visual inspection of dampers. Remote testing of dampers is a relatively new concept to NFPA 80 and no data has been provided to the technical committee to support that remote inspection is equivalent to visual inspection over the life span of a damper. These requirements were relocated, see SR-33.



Public Comment No. 25-NFPA 80-2023 [Section No. 19.3.4.1.4]

19.3.4.1.4 –

A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2 .

Statement of Problem and Substantiation for Public Comment

Remote inspection utilizes technology advancements to reduce cost and increase effectiveness of test scheduling versus visual inspections, increasing the overall safety of life safety dampers. The development of NFPA 915 by the Technical Committee on Remote Inspections leads to the recognition of technology capability and acceptance.

Related Item

- 19.3.4.1.4

Submitter Information Verification

Submitter Full Name: Michael Knipple
Organization: Belimo Americas
Street Address:
City:
State:
Zip:
Submittal Date: Tue May 30 09:21:33 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: The technical committee supports remote inspection, but alterations in buildings should require visual inspection of dampers. Remote testing of dampers is a relatively new concept to NFPA 80 and no data has been provided to the technical committee to support that remote inspection is equivalent to visual inspection over the life span of a damper. These requirements were relocated, see SR-33.



Public Comment No. 3-NFPA 80-2023 [Section No. 19.3.4.1.4]

19.3.4.1.4 –

A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2 .

Statement of Problem and Substantiation for Public Comment

This first draft change doesn't make any sense, why establish an inspection frequency, then exempt it two paragraphs later? It doesn't seem safe to allow 18 years pass without an inspection in hospitals despite the constant scrutiny. In other occupancies, it really doesn't make sense to allow 12 years pass.

Related Item

- FR-19

Submitter Information Verification

Submitter Full Name: Chad Beebe

Organization: ASHE - AHA

Street Address:

City:

State:

Zip:

Submittal Date: Tue May 09 11:58:30 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: The technical committee supports remote inspection, but alterations in buildings should require visual inspection of dampers. Remote testing of dampers is a relatively new concept to NFPA 80 and no data has been provided to the technical committee to support that remote inspection is equivalent to visual inspection over the life span of a damper. These requirements were relocated, see SR-33.



Public Comment No. 31-NFPA 80-2023 [Section No. 19.3.4.1.4]

19.3.4.1.4 –

A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2 .

Statement of Problem and Substantiation for Public Comment

It is my understanding this change goes along with similar proposed changed to NFPA 105 for visual inspection every 3rd cycle, and the rationale for this change came from a public input No. 51 stating "Mechanical devices, such as blade position switches can sometimes indicate that a damper is fully closed when it is not - there are instances where a wire/cable has been installed through the damper which does not allow for it to close fully but enough for the switch to indicate full closure. For this reason, a visual test should be required at regular intervals."

The problem statement from this public comment will already be addressed during the initial mandatory visual inspection testing showing the proper signaling from damper indication switches when the damper is both in the fully open and closed position. This will address any instances of cables running through the damper causing a possible "false positive" indication that a damper is signaling closed but is not fully closed. Having a mandatory visual inspection every 3rd cycle seems unnecessary if the damper has passed an initial visual inspection and has been found to show proper position signaling. Instead, a visual inspection when maintenance, repair, or any other work has been performed at or around the damper that has successfully shown accurate remote testing would be a more acceptable solution, rather than a spot check every 12-18 years depending on occupancy type. I suggest the Technical Committee remove this change to address the issue when the modifications are done rather than waiting for every third cycle to potentially find a damper is not cycling correctly through visual inspection.

Related Item

- Public Input No 51-NFPA 80-2022 [Section No. 19.5.3.2]

Submitter Information Verification

Submitter Full Name: James Carlin
Organization: Pottorff
Affiliation: Employee
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 31 08:37:44 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: The technical committee supports remote inspection, but alterations in buildings should require visual inspection of dampers. Remote testing of dampers is a relatively new concept to NFPA 80 and no data has been provided to the technical committee to support that remote inspection is equivalent to visual inspection over the life span of a damper. These requirements were relocated, see SR-33.



Public Comment No. 42-NFPA 80-2023 [Section No. 19.3.4.1.4]

19.3.4.1.4 –

A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2 .

Statement of Problem and Substantiation for Public Comment

The remote test method was added to NFPA 80 and 105 in an effort to take advantage of existing technology to increase the percentage of dampers that get tested. Today, other than in health care, that percentage is very low due to the difficulty and cost associated with performing visual tests for dampers, which are nearly always out-of-sight and require penetration into walls or ceilings.

During the October 2022 committee discussion of the public input that led to this first revision, advocates of visual inspection cited that certain occurrences happen to dampers which prevent them from operating properly. Examples given were actuators and/or position indication switches malfunctioning, dampers being tied open, boards propping dampers open, and screws being run into the damper linkage. These are all occurrences that absolutely happen. However, the point is that the remote test method will catch all of those issues. When discussing remote damper testing, it is important to remember that we are not talking about curtain-style fire dampers or any dampers with fusible links. (Those dampers are not eligible to use the remote test method.) It is also important to remember that prior to using the remote test method, an initial visual test is required to confirm that the remote test is accurately reflecting the damper's position. Therefore, the occurrences stated as problematic to the damper position indication, should be encountered and resolved at the time of installation if the damper has been installed properly.

Given all of this and the fact that the proposed first revision will significantly increase periodic testing costs, it is incumbent on the technical committee to explain the specific concerns they have that lead to "false positive" remote damper tests. Many of the supporting arguments in favor of increasing visual damper inspections do not take the direct issue into account – which is false positive indication from the FACP devices or similar. Those arguments tend to focus on cables, fusible links, or other components or obstructions that are occasionally present but uncommon.

Requiring that every third test be conducted visually will significantly reduce the justification for owners to pay for the remote testing capability up-front, thereby reducing the number of dampers utilizing the remote test method, and thus reduce the percentage of dampers that get tested. The ease of remotely inspecting dampers compared to visually inspecting them will likely encourage the behavior of regular inspection and inspection of dampers in hard-to-reach places. In contrast, the currently proposed language will deter owners from performing or investing in the remote inspection method, negatively affecting damper testing & inspection compliance.

Therefore, AMCA recommends that this first revision should be struck and not carry forward in the standard's 2025 edition. There have been no concrete examples given of this language from the 2019 and 2022 versions causing problems in the field.

It is relevant to mention that AMCA, on behalf of the air control manufacturer industry (specifically, damper industry), submitted a related code change proposal to ICC for the 2024 International Building Code review process. This was done as an attempt to address some of the claims of electrical wiring or similar building components being run through dampers and ductwork, and to prevent future occurrences. While not accepted into the code exactly as proposed by AMCA, the code proposal was accepted with modifications and will be published in the 2024 IBC as Section 717.2.4 (shown below) [reference FS88-21 As Modified under ICC code revision process]. [Also, here is the link to 2021 IMC Section 602 - https://codes.iccsafe.org/content/IMC2021P3/chapter-6-duct-systems#IMC2021P3_Ch06_Sec602.]

717.2.4 Mechanical, electrical and plumbing controls.

Mechanical, electrical and plumbing controls shall not be installed in air duct systems.

Exception: Controls shall be permitted to be installed in air duct systems only if the wiring is directly associated with the air distribution system. The wiring shall comply with the requirements of Section 602 of the International Mechanical Code and be as short as practicable.

[IBC] Committee Reason: The committee concluded the modification had improved the original proposal; it brings IMC 602 for wiring with a duct. The proposal is a good addition to the code text. (Vote: 13-0)

Related Item

- FR19

Submitter Information Verification

Submitter Full Name: William Koffel

Organization: Koffel Associates, Inc.

Affiliation: AMCA International

Street Address:

City:

State:

Zip:

Submittal Date: Wed May 31 14:53:08 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Action: Rejected

Resolution: The technical committee supports remote inspection, but alterations in buildings should require visual inspection of dampers. Remote testing of dampers is a relatively new concept to NFPA 80 and no data has been provided to the technical committee to support that remote inspection is equivalent to visual inspection over the life span of a damper. These requirements were relocated, see SR-33.



Public Comment No. 6-NFPA 80-2023 [Section No. 19.3.4.1.4]

19.3.4.1.4

A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2.

19.3.4.1.4

~~A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third cycle as required by 19.3.4.1.2.~~

Statement of Problem and Substantiation for Public Comment

It is suggested this new requirement not be accepted and that the current language in the 2022 edition be retained for the following reasons:

1. There is no evidence provided that dampers equipped with the remote test method are failing to indicate dampers that are not operating within their specifications.
2. The additional inspection time of “once every third cycle” is not clear and can vary from 12 to 18 years.
3. This added visual inspection, that includes dampers with remote testing capabilities, defeats the purpose of 19.3.4.2.3.3 Remote Inspection Method.

Related Item

- First Revision No. 19-NFPA 80-2022 [New Section after 19.5.1.3]

Submitter Information Verification

Submitter Full Name: James Gregory
Organization: Health Facility Consulting, LLC
Affiliation: On behalf of the Codes and Standards Review Committee of the Health Care Section of NFPA
Street Address:
City:
State:
Zip:
Submittal Date: Sat May 20 16:28:49 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected
Resolution: The technical committee supports remote inspection, but alterations in buildings should require visual inspection of dampers. Remote testing of dampers is a relatively new concept to NFPA 80 and no data has been provided to the technical committee to support that remote inspection is equivalent to visual inspection over the life span of a damper. These requirements were relocated, see SR-33.



Public Comment No. 13-NFPA 80-2023 [New Section after 19.3.4.2.3.3(A)]

TITLE OF NEW CONTENT

(4) A visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third test cycle.

Statement of Problem and Substantiation for Public Comment

This comment is related to Public Comment No.12-NFPA 80-2023 [Section No. 19.3.4.1.4]. The intent is to require that a visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third test cycle, including dampers utilizing remote inspection. This intent is representative of the Committee Statement listed in the First Draft Report.

The requirement for visual inspection is not appropriate under the testing frequency section. This will result in confusion as the language "shall be performed at least once every third cycle" can be interpreted to apply to all dampers regardless of the inspection method.

19.3.4.1.2 already addresses the current testing frequency requirement in regard to the Remote Inspection Method in 19.3.4.2.3.3(C) The initial remote inspection shall include a visual inspection of the damper in accordance with 19.3.4.2.3.2. Adding proposed section (4) maintains the current location for testing frequency in regards to the Remote Inspection Method.

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<u>Public Comment No. 12-NFPA 80-2023 [Section No. 19.3.4.1.4]</u>	
<u>Public Comment No. 12-NFPA 80-2023 [Section No. 19.3.4.1.4]</u>	
• Public Input No. 51-NFPA 80-2022 [Section No. 19.5.3.2]	<u>Related Item</u>
	• First Revision No. 19-NFPA 80-2022 [New Section after 19.5.1.3]

Submitter Information Verification

Submitter Full Name: Duane Smith
Organization: National Energy Management Ins
Street Address:
City:
State:
Zip:
Submission Date: Tue May 23 12:39:10 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-33-NFPA 80-2023

Statement: This revision is more appropriate under 19.3.4.2.3.3(A)(4), as the intent is to require that a visual inspection in accordance with 19.3.4.2.3.2 shall be performed at least once every third test cycle, including dampers utilizing remote inspection.



Public Comment No. 30-NFPA 80-2023 [New Section after A.4.4.3.3]

A4.4.3.4

Some universal metal glazing kits are relatively easy to be installed in the field. Such glazing options are extensively used within the fire door industry and identical glazing units can be installed in wide array of fire rated doors (wood, hollow metal, etc.). Field installation of such glazing options is presently allowed by NFPA 80 for all fire doors, and now for new wood doors.

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
Hal_s_Wood_Door_With_Visoin_Lite_Kit.pdf	Appendix drawing of a wood door getting a VL Kit Installed	

Statement of Problem and Substantiation for Public Comment

I am submitting the Appendix verbiage and drawing to help better describe the First Draft addition of 4.4.3.4.

The drawing is submitted and drawn by me, with no copyright protection. NFPA may edit and use as they see fit.

Related Item

- 4.4.3.4

Submitter Information Verification

Submitter Full Name: Harold Kelton
Organization: DOORDATA Solutions, Inc.
Affiliation: Self
Street Address:
City:
State:
Zip:
Submittal Date: Tue May 30 19:24:06 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-48-NFPA 80-2023
Statement: The new annex and figure are provided to guidance for field installed vision light kits.



Public Comment No. 35-NFPA 80-2023 [New Section after A.5.2.3.1]

A.5.2.3.1.1

As per manufacturer requirements, Special-Purpose Horizontally Sliding Accordion or Folding Doors may require the knowledge and training specific to this type of fire door because of the special construction and operation. Manufacturer training and certification for acceptance testing may be necessary because of the multitude of components involved; working together for the door to be tested and operational. It may be deemed essential the Special-Purpose Horizontally Sliding Accordion or Folding Door manufacturers maintain oversight of any person involved in the acceptance testing of such products. When requested, such a person should be able to produce documented evidence of training. Manufacturers of listed Special-Purpose Horizontally Sliding Accordion or Folding Doors offer the necessary inspection, testing, and maintenance materials, software programs, and documentation needed to properly inspect and record the performance and compliance of Special-Purpose Horizontally Sliding Accordion or Folding Doors. Acceptance testing should be documented on a specific form complying with industry standards. The door should be provided with an inspection mark that complies with industry standards indicating when it was last inspected, tested, and maintenance performed.

Statement of Problem and Substantiation for Public Comment

NFPA 80 criteria for inspection, testing, and maintenance of Chapter 9 Special-Purpose Horizontally Sliding Accordion or Folding Doors is not established.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa
Organization: Door Services Corporation
Affiliation: Won-Door
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 31 12:51:27 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-29-NFPA 80-2023
Statement: It is imperative for the proper function of these types of doors that they are tested in accordance with the manufacturer's installation instructions by personnel that are trained on the testing and operation of these doors.

The annex section was removed due to violation with the NFPA Commercial Terms and Conditions Policy section 3.2



Public Comment No. 29-NFPA 80-2023 [New Section after A.5.2.4.2]

A.5.2.4.2.1

As per manufacturer requirements, Special-Purpose Horizontally Sliding Accordion or Folding Doors may require the knowledge and training specific to this type of fire door because of the special construction and operation. Manufacturer training and certification for periodic inspection, testing, and maintenance may be necessary because of the multitude of components involved; working together for the door to be tested and operational. It may be deemed essential the Special-Purpose Horizontally Sliding Accordion or Folding Door manufacturers maintain oversight of any person involved in the periodic inspection, testing, and maintenance of such products. When requested, such a person should be able to produce documented evidence of training. Manufacturers of listed Special-Purpose Horizontally Sliding Accordion or Folding Doors offer the necessary inspection, testing, and maintenance materials, software programs, and documentation needed to properly inspect and record the performance and compliance of Special-Purpose Horizontally Sliding Accordion or Folding Doors. Periodic inspection and testing should be documented on a specific form complying with industry standards. The door should be provided with an inspection mark that complies with industry standards indicating when it was last inspected, tested, and maintenance performed.

Statement of Problem and Substantiation for Public Comment

NFPA 80 - Chapter 9 Inspection, Testing, Maintenance criteria vague. Establishing criteria for inspection and qualified person.

Related Item

- CI-53

Submitter Information Verification

Submitter Full Name: Nicole Casa
Organization: Door Services Corporation
Affiliation: Won-Door
Street Address:
City:
State:
Zip:
Submission Date: Tue May 30 15:57:15 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-31-NFPA 80-2023
Statement: It is imperative for the proper function of these types of doors that they are tested in accordance with the manufacturer's installation instructions by personnel that are trained on the testing and operation of these doors.

The annex section was removed due to violation with the NFPA Commercial Terms

and Conditions Policy section 3.2



Public Comment No. 1-NFPA 80-2023 [Section No. A.6.4.1.5]

A.6.4.1.5

Adequate spring power is essential for hydraulic door closers to close a fire door with sufficient force to overcome the resistance of the latching mechanism. However, too much spring power causes opening resistance and makes it difficult for ~~the handicapped, the infirm,~~ individuals with mobility disabilities, and young children to open doors.

Closers are categorized in sizes from 2 to 6, with an increased closing force for higher numbers. Generally, a size 4 minimum closer should be used on exterior fire doors and a size 3 minimum closer should be used on interior fire doors. Door widths greater than 3½ ft (0.97 m) exterior and 3½ ft (1.02 m) interior, parallel or single lever arm applications, and abnormal air pressures usually require an increase to the next size. A combination of these factors could necessitate an increase of two sizes. Individual manufacturer recommendations should be consulted.

Spring hinges should be adjusted to achieve positive latching when allowed to close freely from an open position of 30 degrees.

Where indicated in individual certifications, products have additionally been investigated in accordance with UL 10C, *Positive Pressure Fire Tests of Door Assemblies*.

Statement of Problem and Substantiation for Public Comment

The NFPA Disability Access Review and Advisory Committee (DARAC) requests an update to the terminology used to describe individuals with disabilities. In general, we suggest using “people first” language to avoid characterizing a person or group of persons entirely by their disability. Also, where possible, we recommend substituting the appropriate technical term when describing building elements that are accessible to individuals with disabilities, rather than describing the element as being “for” such people. For example, we would say “accessible parking” instead of “handicap parking”. The substitute terms we recommend are found to be more acceptable to the disability community and its supporters and, therefore, demonstrate greater respect.

Related Item

- FR 27

Submitter Information Verification

Submitter Full Name: Jessica Hubert

Organization: Guardian Services Inc.

Affiliation: Representing the DARAC Advisory Committee

Street Address:

City:

State:

Zip:

Submittal Date: Thu Mar 16 10:29:04 EDT 2023

Committee: FDW-AAA

Committee Statement

Committee Accepted

Action:**Resolution:** [SR-14-NFPA 80-2023](#)**Statement:** The technical committee agrees with the substantiation on the public comment, which is as follows:

The NFPA Disability Access Review and Advisory Committee (DARAC) requests an update to the terminology used to describe individuals with disabilities. In general, we suggest using “people first” language to avoid characterizing a person or group of persons entirely by their disability. Also, where possible, we recommend substituting the appropriate technical term when describing building elements that are accessible to individuals with disabilities, rather than describing the element as being “for” such people. For example, we would say “accessible parking” instead of “handicap parking”. The substitute terms we recommend are found to be more acceptable to the disability community and its supporters and, therefore, demonstrate greater respect.



Public Comment No. 55-NFPA 80-2023 [Section No. A.19.3.4.1.3]

A.19.3.4.1.3

It is recognized that some dampers in existing buildings 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. Use of the term *inaccessible* is meant to convey a significant physical or structural impediment(s) to code compliance due to existing construction features, topography, or other existing constraints that 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 technical justification for the designation and documentation stating the inaccessible damper poses no significant risk to the performance of the system would not be justification for ~~of an AHJ to grant an~~ exemption for a single damper. Maintenance should still be required in accordance with 19.3.5.

Statement of Problem and Substantiation for Public Comment

Aligning with PC54

Related Public Comments for This Document

<u>Related Comment</u>	<u>Relationship</u>
<u>Public Comment No. 54-NFPA 80-2023 [Section No. 19.3.4.1.3]</u>	Annex Note
<u>Related Item</u>	
• FR44	

Submitter Information Verification

Submitter Full Name: Joshua Brackett
Organization: Banner Health
Street Address:
City:
State:
Zip:
Submission Date: Wed May 31 19:22:03 EDT 2023
Committee: FDW-AAA

Committee Statement

Committee Action: Rejected but see related SR
Resolution: SR-15-NFPA 80-2023
Statement: This clarifies the condition which the AHJ is approving. They are approving the inaccessible designation for a damper. The term "not accessible" was changed to "inaccessible" for consistency.

It is imperative for the AHJ to be involved in the determination of the inaccessible condition. It is outside the scope of NFPA 80 to determine who is the AHJ and how they

apply the standard.