NFPA 80-2022 Edition

Standard for Fire Doors and Other Opening Protectives

**TIA Log No.: 1762** 

**Reference:** 3.3.131, and A.5.2.4.2

Comment Closing Date: December 19, 2023

Submitter: Chad Beebe, American Society for Healthcare Engineering

www.nfpa.org/80

1. Delete paragraph 3.3.131 to read as follows:

**3.3.131** 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 a manufacturer of a listed rolling steel fire door.

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

**A.5.2.4.2** Rolling steel fire doors are unique with respect to other fire door types because of the complexity of tension release and automatic closing systems of these doors as opposed to other types of doors that typically open and close entire units. Special training for periodic inspection and testing is necessary because of the multitude of components involved that must work together for the door to be tested and reset correctly. It is essential that the rolling steel fire door industry maintain oversight of any person involved in periodic inspection and testing of such products. When requested, such a person should be able to produce documented evidence of training. Recognized industry organizations and manufacturers of listed rolling steel fire doors with appropriate training materials and programs are viable options for training individuals about the proper performance of rolling steel fire doors and their applicable codes and standards.

**Substantiation:** The current text creates a restraint of trade issue. This was identified in the development of the 2025 edition as several other similar definitions were created. A technician should not be required to be employed in the rolling steel fire door industry. This places an unnecessary restriction and ability for building owners to employ people with the same skillset to perform the work where this is identified in the standard. The definition and related sections using the term creates a monopoly on the periodic inspection of rolling steel fire door systems.

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

The existing published language violates the United States Antitrust Law, NFPA's Antitrust Policy, The NFPA Manual of Style and the guide for conduct of participants of the NFPA standards development process.

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