

Suggestions from: S. Gilbert of Superior Protection Services on the proposed FDNY Rule changes for the September 22, 2022 hearing @ 11:00 AM.

1. This proposed rule change requires some clarification with regards to its full intent. After reading it several times it appears to me that the proposed changes directly address build outs of an existing approved new high rise fire alarm system and the profession certification of the plans and work performed related to them. Please confirm such or clarify other points.

If that is the case it is too limited in its intent to expedite the process and should also include changes on other fire alarm systems. It should include fire alarm systems that are approved and now required relocation, removal and additional devices to be added using the same stated processes. By adding that, much time can be saved overall on other jobs and things can move more quickly. Please consider adding other fire alarm systems into this process and not just for new high rise building build outs.

2. The next item here that should also be addressed is Post Approval Amendments that should be included in the self-certification process, just like with the Buildings Department Directive # 14. As stated everything is subject to an audit but by doing this the Letter of Approval would be expedited and that is what everyone needs. This also would move things along so consider adding this as well.

3. With regards to the definition list under 104-02 Professional Certification of Fire alarm Design and Installation item (B) definitions, the follow two items should be added since they are very relevant to the core system and not an afterthought:

(11) Electrical lock releases and the operation fire/smoke dampers for the core and stairwells.

(12) Fire/Booster pumps and electrical generators.

4. Under 104-04 Certification of corrected Defects in Fire alarm system Installation, there is a need to clearly state as what can be and cannot be certified as well as the number of items that can be. It should be based upon the size and type of the job and not limited to just some sort of arbitrary number like now that are three. Should a twenty story building be limited to three defects as opposed maybe twenty three as an example only? The majority of them may be minor such as labeling and that number of defects cannot be self certified. This needs to be more defined for the real world if the intent here it to reduce the need for a re-inspection otherwise why do it and not just call for an inspection?

Thank you for your time and I hope that what I have suggested will be truly evaluated, consider and possibly be added now not down the road.