



September 22, 2022

To Whom it May Concern:

Thank you for the opportunity to provide comment on the proposed rule change to amend Fire Department rules 3 RCNY §§ 104-02 (entitled “Professional Certification of Fire Alarm System Installations”), 104-04 (entitled “Certification of Corrected Defects in Fire Alarm System Installations”) and 105-01 (entitled “Approval of Fire Alarm System Installations”) to conform these rules to the provisions of the 2022 New York City Fire Code and current Fire Department filing procedures, and to facilitate professional certification of fire alarm system design and installation in lieu of Fire Department plan examination and inspection of such systems. The New York Electrical Contractors Association represents 250 electrical subcontractors, who employ 12,000 members of Local Union #3, IBEW.

Regarding section **§104-02 (b) Definitions**, we would like to see the list of building core fire alarm systems to be expanded to include:

- 11) Fire or sprinkler booster or jockey pump.
- 12) Any standalone carbon monoxide, smoke etc. system not part of building core fire alarm system and does not report to Fire Alarm control unit.
- 13) Any fire suppression system (for example, FM 200 etc).

The proposed building core fire alarm systems and equipment list does not include the fire pump specifically. This is a major firefighting equipment that is designed to run in the harshest condition while the building is on fire. It is a major component that FDNY should witness its operation during an inspection and not leave it up to self-certification as proposed by its omission from the list.

The proposed building core fire alarm systems and equipment list does not include specifically standalone carbon monoxide system that cannot be tied into the existing fire Alarm control unit.

Standalone carbon monoxide (“CO”) systems are being installed throughout New York City and many times in buildings in which existing fire alarm systems are not expandable. When a CO fire alarm standalone system is added to an existing building, when an existing fire alarm system is not expandable, it is imperative that FDNY witness its proper operation and not permit a simple self-certified, as proposed by its omission from the list. This is especially important, because these CO systems are being installed in NYC schools, which could put countless children at risk.

The proposed building core fire alarm systems and equipment list does not include specifically any fire suppression system such as FM 200 etc.

As to fire suppression systems, halon has been replaced with other fire suppression systems, such as FM 200. These systems are vital and are the first to discharge in a fire. Due to them being one of the first lines of defense to a localized fire, the FDNY should inspect the installation for proper operation.

Additionally, in subsection **§104-02(c)(6) Disqualification for false certification**, we suggest it be revised to “the Fire Code and have their certificate of fitness revoked.”

This is a slight change that would present a meaningful result. As the draft is written, the person would retain his or her certificate of fitness but be barred from submitting a professionally certified application under the Fire Code. The Board’s intent can more easily be achieved by revoking the certificate of fitness altogether. This would create a clearer distinction/barrier prohibiting the individual from improperly submitting or representing to an individual that he or she may submit, a professional certification.

We hope the FDNY will consider these modifications to the proposed rule changes.

The New York Electrical Contractors Association is the leading trade association of electrical contractors in New York City. We help build New York, serve our communities in times of crisis, provide opportunities for minority and women-owned businesses, and promote the highest standards of worker safety in the industry.

THE NEW YORK ELECTRICAL CONTRACTORS  
ASSOCIATION

By:   
Edwin Lopez  
Executive Secretary