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100 YEARS

September 22, 2022

New York Building Congress' Comments Regarding the Proposed Rule on Professional Certification of Fire Alarm System Design & Installation

On behalf of more than 550 constituent organizations comprising more than 250,000 skilled tradespeople and professionals, the Building Congress supports sound public policy, promotes productive capital spending, encourages public/private partnerships, and evaluates the implementation of major government projects. We are proud to continue to support the FDNY in their work to keep our city's buildings safe, and commend your work to clarify the appropriate installation and inspection process for our fire alarm systems. We acknowledge, specifically, authorizing the certification of the design and installation of fire alarm systems by professionals outside the fire department in an effort to make the process more efficient. The Building Congress joins our partners in the building industry to ask the FDNY to consider the following recommendations:

- 1. Allow the design certification and installation inspections to be completed separately, by different firms.** The way the rule is written currently expands the type of professional who can certify the design of the system and complete the installation inspection, lumping both processes together. Making this clarification will ensure the certification and inspection are being done by firms who have the specific qualifications, expertise, and capacity to do so. It would also ensure an adequate pool of professionals is available to complete these processes in a timely and effective manner.
- 2. Clarify the steps required to complete an installation inspection.** FDNY should outline the steps necessary to ensure a fire alarm system has been properly installed to guarantee best practices are followed. They should also include a set of qualifications necessary to obtain a Certificate of Fitness for these specific inspections, and whether the standing Certificate of Fitness will be utilized or a new one will be created. Lastly, FDNY should outline a procedure to request reconsideration of an electrical defect following an installation audit. Including specifics of these procedures will ensure professionals better understand the expectations and practices necessary to install these fire alarm systems correctly.