

## NEW YORK CITY FIRE DEPARTMENT

### **Notice of Public Hearing and Opportunity to Comment on Proposed Rule**

**What are we proposing?** The Fire Department is proposing 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.

**When and where is the hearing?** The Fire Department will conduct a virtual public hearing, using the “GoToMeeting” application, as set forth below. The public hearing will take place at **11:00 a.m. on Thursday, September 22, 2022.**

**How do I comment on the proposed rule?** Anyone can comment on the proposed rules by:

- **Website** - You can submit comments to the Fire Department through the NYC rules website at <http://rules.cityofnewyork.us>, or on the “FDNY Rules” page of the Fire Department’s website, <http://www1.nyc.gov/site/fdny/codes/fire-department-rules/fire-dept-rules.page>.
- **Mail** - You can mail written comments to Code Development Unit, Bureau of Fire Prevention, New York City Fire Department, 9 MetroTech Center, Room 3N2, Brooklyn, NY 11201.
- **Speaking at the hearing** - Anyone who wants to comment on the proposed rule at the on-line public hearing must sign up by emailing [code.develop@fdny.nyc.gov](mailto:code.develop@fdny.nyc.gov). You will receive by reply email a link to the GoToMeeting and call-in information. The time for which you can speak at the hearing may be limited.

Join through Internet:

To join the hearing, use your Internet browser to click on the URL link that will be sent to you (or copy the link and paste it into your browser’s address bar). Then follow the prompts to enter the meeting password and attendee ID.

When joining the meeting, choose either “use computer for audio” or “call in” for the audio portion of the public hearing. The information needed to connect (phone number, access code and/or attendee ID) will be provided after you join the GoToMeeting. If you have low bandwidth or inconsistent Internet connection, we suggest you use the “call-in” option.

Join by phone only (call-in option):

To join the hearing only by phone, use the phone number and access code that you will receive by reply email.

**Is there a deadline to submit written comments?** Yes, you must submit written comments by **Thursday, September 22, 2022.**

**What if I need assistance to participate in the hearing?** You must notify the Bureau of Fire Prevention if you need a sign language interpreter or other reasonable accommodation for a disability at the hearing. Write to us at the address above or telephone us at (718) 999-2042. Advance notice is requested to allow sufficient time to arrange the accommodation. Please notify us by **Friday, September 9, 2022.**

**Can I review the comments made on the proposed rule?** You can review the comments made online on the proposed rules by going to the website at <http://rules.cityofnewyork.us>. A few days after the hearing, a record of the hearing and copies of the written comments will be available to the public at the Bureau of Fire Prevention.

**What authorizes the Fire Department to make this rule?** Section 1043(a) of the New York City Charter and Section 102.6.3 of the New York City Fire Code (Title 29 of Administrative Code of the City of New York) authorize the Fire Department to propose this rule. The Fire Department's FY2023 Regulatory Agenda indicated that the Fire Department would be conforming its rules to the provisions of the 2022 Fire Code, as enacted by Local Law No. 47 of 2022. These proposed rule amendments make such conforming changes and implement the provisions of 2022 Fire Code FC104.2.1.

**Where can I find the Fire Department rules?** The Fire Department rules are codified in Title 3 of the Rules of the City of New York and can be viewed on the Fire Department's website at [www.nyc.gov/fdny](http://www.nyc.gov/fdny) and at <http://rules.cityofnewyork.us>.

**What laws govern the rulemaking process?** The Fire Department must meet the requirements of Section 1043 of the New York City Charter when creating or changing rules. This notice is made in accordance with the requirements of Section 1043(b) of the New York City Charter.

### **Statement of Basis and Purpose of Proposed Rule Amendments**

The Fire Department is proposing to amend several sections of the Fire Department's rules to conform the 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.

These changes will help expedite fire alarm system plan and inspection approvals, saving building owners' time and money, potentially expediting occupancy or re-occupancy of a building or space.

The New York City Fire Code, codified as Chapter 2 of Title 29 of the New York City Administrative Code, was amended by Local Law No. 47 of 2022, effective April 15, 2022. Local Law 47 concluded the periodic code revision mandated by Administrative Code §29-104. The amended Fire Code is known as the 2022 Fire Code.

Fire Code Section FC 104.2.1 authorizes the professional certification of the design and installation of fire alarm systems (except as to the core building fire alarm system) in lieu of Fire Department plan examination and/or inspection of such systems. Local Law 47 amended this section to clarify certain terminology and to authorize professional certification by fire alarm installers and electricians in addition to professional engineers and registered architects.

This proposed rule would amend Fire Department rule 3 RCNY § 104-02, entitled “Professional Certification of Fire Alarm System Installations” (“Section 104-02”), to implement these changes enacted by Local Law 47.

FC104.2.1 allows professional certification with respect to fire alarm system devices or equipment “that are not part of the building core.” The proposed rule would clarify the scope of allowable professional certification by incorporating a list of fire alarm systems that are part of what is now referred to as the “building core fire alarm system.”

The proposed rule would also amend the Section 104-02 to:

- incorporate the additional types of licensed professionals who can professionally certify fire alarm systems;
- incorporate the new Fire Code requirement that persons engaging in professional certification of fire alarm systems hold a Fire Department Certificate of Fitness for that purpose; and
- clarify that such persons may professionally certify fire alarm system design and installation only within the scope of the lawful authority they possess under their license or certification, and in accordance with the provisions of this section.

The proposed rule would also amend Fire Department rule 3 RCNY § 105-01, entitled “Approval of Fire Alarm System Installations” (“Section 105-01”), to reflect changes in the filing and review of fire alarm system plans. Section 105-01 sets forth detailed requirements for the submission of physical plans. However, with the Fire Department’s establishment of an online electronic portal, fire alarm plans are now filed electronically, and Section 105-01’s requirements are no longer applicable. Any technical requirements for electronic submissions will be specified in the electronic portal.

Additionally, since the enactment of Local Law No. 195 of 2018, proposed plans for fire alarm systems are no longer filed with the New York City Department of Buildings for review of the fire alarm system design. Section 105-01 is proposed to be amended accordingly.

Finally, the proposed rule would amend Fire Department rule 3 RCNY §104-04, entitled “Certification of Corrected Defects in Fire Alarm System Installations” (“Section 104-04”). Section 104-04 addresses certification of correction of fire alarm system defects not in lieu of a

Fire Department inspection of a fire alarm system, but in response to a Fire Department inspection that resulted in issuance of a Notice of Defect. The proposed rule would make two changes to the existing rule:

- Clarifying the scope of the certification of system operation following correction of the defects. The scope of certification is limited to the fire alarm system components that were the subject of the Notice of Defect and related operations, not the entire fire alarm system.
- Eliminating the need for filing of a certification form for administrative violations, such as submission of as-built plans. A separate certification form was determined to be unnecessary as the plans and/or other required documentation would themselves require certification by the professional who prepared them.

Terms used in the proposed rule that are defined in the Fire Code or elsewhere in the Fire Department’s rules are indicated by *italics*.

New material is underlined.

Material to be deleted is in [brackets].

Asterisks (\*\*\*) indicate unamended text.

“Shall” and “must” denote mandatory requirements and may be used interchangeably in the rules of this department, unless otherwise specified or unless the context clearly indicates otherwise.

Section 1. Section 104-02 of chapter 1 of Title 3 of the Rules of the City of New York, is proposed to be amended as follows:

**§ 104-02 Professional Certification of Fire Alarm System Design and Installation[s]**

- (a) Scope. This section sets forth the standards, requirements and procedures for the *professional certification* of the design and installation of *fire alarm systems*.
- (b) Definitions. The following terms shall, for purposes of this section and as used elsewhere in the *rules*, have the meanings shown herein:

**[Core building] Building core fire alarm system.** *Fire alarm system* devices and equipment in and around the central or main building stairwells, elevators and utility risers of any buildings, except buildings classified in *Occupancy Group R-3*.

[A fire alarm system includes the fire command center (commonly referred to as a fire command station), fire pump, main sprinkler water flow switch, main sprinkler valve tamper switch, elevator lobby smoke detectors, central station connections, elevator in readiness operation, and core alarm boxes, warden phones and other fire alarm communications devices. Such *fire alarm systems* are also commonly referred to as the “base” building system.]

The following fire alarm system devices and equipment are considered to be part of the building core fire alarm system:

- (1) Fire alarm control unit, including booster panels and data gathering panels.
- (2) Central station communications devices and equipment.
- (3) Elevator recall initiating devices and equipment.
- (4) Automatic smoke control and pressurization devices and equipment.
- (5) Sprinkler water flow and tamper switch devices and equipment.
- (6) Fire detection devices in electrical, elevator, mechanical and telephone equipment rooms serving building core spaces and systems, excluding equipment rooms serving tenant business operations.
- (7) Manual fire alarm boxes at or near stairwells.
- (8) Warden phones and firefighter phones.
- (9) Duct detectors and fan shutdown relays for any HVAC unit greater than 2000 cubic feet/minute (cfm) serving building core spaces and systems.
- (10) Notification appliances in building core areas and means of egress stairwells.

**Letter of approval.** The written determination of the *Department* that a *fire alarm system* installation has been installed and is operating in compliance with the *Building Code*, *Electrical Code* and Fire Code and other applicable requirements for such installation enforced by the *Department*.

**Professional certification/professionally certified.** The submission to the *Department* of a signed, personal verification by a person holding a *certificate of fitness* for professional certification of *fire alarm and emergency alarm system* installations and testing who is a *registered design professional*, master electrician, special electrician, or fire alarm system installer with NICET-Level III certification licensed by or registered with the State of New York, that accompanies an *application* and/or *design and installation documents* filed with the *Department* and attests that such *application* or *design and installation documents* do not contain any false information and that such *application* or *design and installation documents* are in compliance with all applicable laws, rules and regulations.

(c) General Provisions

- (1) Professional certification of fire alarm system installations. *Fire alarm system* installations may be *professionally certified*, as set forth in FC104.2.1, in accordance with the provisions thereof and this section, in buildings for which a *letter of approval* has been issued for the [core] *building core fire alarm system*. A *building core fire alarm system* may not be *professionally certified*.

- (2) Qualifications. Only [*registered design professionals*] persons possessing the qualifications set forth in FC104.2.1 and holding the requisite *certificate of fitness* may *professionally certify* that *fire alarm system* installations are in compliance with the Fire Code, *Building Code*, applicable provisions of *Department* and *Department of Buildings* rules, and other applicable laws, rules and regulations. Such persons may *professionally certify fire alarm system* design and installation only within the scope of the lawful authority they possess under their license or certification, and in accordance with the provisions of this section.
  - (3) Format of design and installation documents. *Design and installation documents* and related submissions shall be in the format set forth in R105-01[(b)(4)] or as otherwise designated by the *Department*.
  - (4) Letter of approval. *Letters of approval* for *fire alarm system* installations that have been *professionally certified* will indicate that the *fire alarm system* installation, or part thereof, was approved by the *Department* based upon *professional certification* pursuant to FC104.2.1.
  - (5) Audit. All *fire alarm system* installations that have been *professionally certified* are subject to audit.
  - (6) Disqualification for false certification. Pursuant to FC104.2.1.1, in addition to the penalties for violating provisions of the applicable laws, rules and regulations, [*registered design professionals*] any person who submits false or fraudulent documents certifying compliance with the requirements of the Fire Code and *rules* may be disqualified from submission of *professionally certified* applications under the Fire Code.
- (d) Submission and Approval Procedure\_
- (1) Submission of professional certification.] A completed Fire Department fire alarm professional certification form for any *fire alarm system* installation, or part thereof, that is being *professionally certified* in lieu of a *Department plan examination and/or inspection* in accordance with the provisions of FC104.2.1 and R104-02, shall be submitted to the *Department*, [together with the submissions required by R105-01(c)(2)(A)(2), (3) and (4), including the *design and installation documents* approved for the installation; “as-built” *design and installation documents* of the *fire alarm system* installation and the facility in which it is installed, as actually constructed; and the applicable fee for review of such an *application*.] as follows:
    - (A) Professional certification of proposed fire alarm system design in lieu of plan examination. Prior to installation, *design and installation documents for the fire alarm system work professionally certified by a registered design professional*, must be electronically filed with the *Department* in the form and manner prescribed on the *Department’s* electronic portal,

including completion of the applicable application form and payment of applicable fees, and with such supporting documentation (including any documentation required by FC105.4.4.1) as may be required by the Department. If the application is satisfactorily completed and submitted, the Department will issue a letter of acceptance indicating acceptance of the professionally certified plans.

(B) Project authorization. Application must be made for a project authorization authorizing commencement of work at time of filing of the professionally certified design and installation documents, or at any time thereafter. Issuance of project authorization shall be equivalent to a Department of Buildings work permit for purposes of consideration as a project in progress within the meaning of R102-01(g).

(C) Professional certification of fire alarm system installation in lieu of department inspection. Upon completion and satisfactory testing of the fire alarm system installation, professional certification of the installation by a licensed or certified professional holding the requisite certificate of fitness, must be electronically filed with the Department in the form and manner prescribed on the Department's electronic portal, including completion of the applicable application form and payment of applicable fees. Such professional certifications shall be within the scope of their lawful authority under their license or certificate. Professional certification may be submitted for the scope of work set forth in the project authorization, unless the scope of such professional certification is restricted by the letter of acceptance approving the design of the installation. Such submissions [shall] must be [made at the earliest date following] promptly filed upon the completion of such installation, but in all cases prior to occupancy of any building, or part thereof, that is to be newly occupied or reoccupied. If the application and professional certification are satisfactory in form and content, the Department will issue a letter of approval indicating approval of the professionally certified installation.

[(2) Acceptance and issuance of letter of approval. *Professionally certified design and installation documents* will be accepted for filing, and a *letter of approval* issued. The *Department* may review such *professionally certified design and installation documents* for completeness and/or other purposes, and if it determines they are deficient, may deny or rescind acceptance and issuance of the *letter of approval*.

(3) Filing with Department of Buildings. The “as built” *design and installation documents* submitted to and accepted by the *Department* will be electronically filed with the *Department of Buildings* by the *Department* as part of the applicant’s *Department of Buildings* application, unless another manner of filing such documents with the *Department of Buildings* is prescribed by the *Department*.]

§ 2. Subdivisions (f) and (g) of section 104-04 of chapter 1 of Title 3 of the Rules of the City of New York, are proposed to be amended as follows:

**§ 104-04 Certification of Corrected Defects in Fire Alarm System Installations**

\* \* \*

- (f) Scope of Certification of Professional Verifying System Functionality. *Certification of corrected defects* constitutes a representation by the licensed or certified professional verifying the functionality of the *fire alarm system* following correction of defects, made under the authority granted to the licensed or certified professional by his or her professional license or certification and the applicable *Department* certificate, that a defect involving a missing or non-working component has been corrected and the *fire alarm system* components that were installed and/or repaired in order to correct the defective condition [is] are operating as designed in accordance with the approved plans for the *fire alarm system*, as amended by any as-built *design and installation documents*, including the Input/Output programming matrix that defines the sequence of operation (as set forth in [Annex A] to Section A.14.6.2.4 of Annex A to NFPA Standard 72).
  
- (g) Submission and Acceptance of Certification of Corrected Defects. *Certification of corrected defects* shall be submitted to the *Department*, and, if satisfactory, accepted by the *Department*, in the following manner:
  - (1) **Submission.** *Certification of corrected defects* shall be submitted on the form *approved* by the *Department* for this purpose. If there are no defects in the design or installation of the fire alarm system and the notice of defect requires submission of the applicable A-433 form, as-built design and installation documents or other documentation required solely to complete the application (administrative defects), submission of certification of corrected defects is not required. Such submissions must bear such certifications as may be required by law, rule or Department procedure.
  
  - (2) **Required signatures.** The *approved* form for *certification of corrected defects* shall be personally signed by all parties required for the certification. As such, except as otherwise provided in R104-04(g)(3), it shall bear the signatures of up to three separate licensed or certified professionals: the signature of the one or two licensed or certified professional(s) who corrected the defect(s) and the signature of the licensed or certified professional who verified the functionality of the *fire alarm system* following correction of defects.
  
  - (3) **As-built plans and A-433 forms.** To complete a *fire alarm system* application, any changes to a *fire alarm system* from the original approved design must be reflected on the applicable *Department* A-433 form, as-built *design and installation documents* and/or other required documentation and submitted to the *Department* prior to, or at the time of, the *Department* inspection. [When a notice of defect



directs the filing of an A-433 form, as-built *design and installation documents* and/or other documentation, such documentation shall be submitted together with a *certification of corrected defects*. If there are no defects in the design or installation of the *fire alarm system* and the notice of defect requires submission of the applicable A-433 form, as-built *design and installation documents* or other documentation solely to complete the application, the *certification of corrected defects* requires only a single signature, that of the licensed or certified professional verifying the functionality of the *fire alarm system*.]

- (4) **Acceptance and letter of approval.** Upon acceptance of *certification of corrected defects*, including, where required, acceptance of the as-built *design and installation documents*, A-433 forms and/or other documentation, the *Department* will deem the defective condition corrected. If there are no other outstanding defects or other considerations preventing its issuance, a *letter of approval* will be issued for the *fire alarm system*.

\* \* \*

§ 3. Section 105-01 of Chapter 1 of the Rules of the City of New York, is proposed to be amended as follows:

#### § 105-01 Approval of Fire Alarm System Design and Installation[s]

- (a) Scope. This section sets forth the standards, requirements and procedures for the submission of *design and installation documents* for *fire alarm system* installations for *Department* review and approval.
- (b) General Provisions
- (1) Submission and approval required. Pursuant to [FC907.1.1] FC907.3, *design and installation documents* for *fire alarm system* installations, containing such details as may be required by the Fire Code, *Building Code*, *Electrical Code* and this section, shall be submitted for *Department* review and approval prior to system installation in the form and manner prescribed on the *Department's* electronic portal.
- (2) Certification of design and installation documents. Pursuant to FC105.4.1, *design and installation documents* must be prepared by a *registered design professional*. Such documents shall bear the seal of such design professional, which shall serve to certify that the documents are in compliance with applicable provisions of the Fire Code, *Building Code*, *rules*, and other applicable laws, rules and regulations.
- (3) Filings upon completion of installation. Upon completion and satisfactory testing of a *fire alarm system* installation that comprises any part of a *core building system*,

the *owner* shall submit a request for inspection pursuant to R105-01(c)(2). Upon completion of a *fire alarm system* installation that does not comprise any part of a [core] building core fire alarm system, the *owner* [shall] may alternatively submit [such a request or a] *professional certification* of the installation, except as may otherwise be provided in the letter of acceptance approving the design of the installation.

- (4) Format of design and installation documents. The *design and installation documents* required by this section shall be formatted (to scale) [either to the standard size of 24 inches by 36 inches in dimension, or to the folio size of 11 inches by 17 inches in dimension, as specified in this section, or in such other format as may be designated by the *Department*. The *Department* may require, pursuant to FC105.4, submission of *design and installation documents* and related submissions, in an electronic format designated by the *Department*] in the form and manner prescribed on the *Department's* electronic portal.

(c) Submission and Approval Procedure

(1) Submission and approval of *design and installation documents*

(A) Submissions. Applications for approval of *fire alarm systems* [shall first be filed with the *Department of Buildings*, and a *Department of Buildings* application number obtained. Thereafter, two (2) sets of engineering drawings complying with the requirements of *Building Code* Section BC907.1.1 and bearing the *Department of Buildings* application number,] shall be [submitted to] electronically filed with the *Department*[, by filing them at the *Bureau of Fire Prevention's* plan intake window, together with a copy of all forms filed in connection with the *Department of Buildings application*, and a *Department design and installation document examination application* form. One set of the engineering drawings shall be formatted to standard (24 x36) size and one to folio (11 x17) size] in the form and manner prescribed on the *Department's* electronic portal, including completion of the applicable application form and payment of applicable fees.

(B) Approval. The *Department* will review the *design and installation documents* submitted pursuant to R105-01(c)(1)(A), and, if determined to be in compliance with the requirements of the laws, rules and regulations enforced by the *Department*, [stamp such documents approved] approve such documents in accordance with FC105.4.4.2 and *Department* procedures.

[(C) Retention of approved engineering drawings. The *Department* will retain an electronic copy of the *approved* engineering drawings in folio (11 x 17) size, and return both sets of *approved* original engineering drawings to the applicant. The applicant shall retain the *approved* original engineering

drawings, and make the standard (24 x 36) size set available to the *Department* representative at the time of inspection pursuant to R105-01(c)(3)(A).]

(2) Department inspection filing

(A) Submissions. *Applications* for *Department* inspection of a *fire alarm system* installation shall include the following documentation and such other information and documentation as the *Department* may require:

- (1) the *Department*'s "request for inspection" application form;
- (2) "as built" *design and installation documents* of the *fire alarm system* installation, and the facility in which it is installed, as actually constructed, formatted in folio (11 x 17) size, and containing:
  - (a) the information required by *Building Code* Section 907.1; and
  - (b) the Input/Output programming matrix and written certification required by R105-01(c)(2)(A)(3) and (4).

If such "as built" *design and installation documents* cannot be electronically filed at the time of submission of the request for inspection because installation work has not been completed, such "as built" documents may be submitted thereafter but no later than the date of inspection of the installation, either by electronically filing them [at the *Bureau of Fire Prevention*'s plan intake window] using the *Department*'s electronic portal or by providing them to the *Department* representative at the time of inspection of the installation.

- (3) a completed Input/Output programming matrix that defines the sequence of operation, as set forth in [Annex A to Section A.10.6.2.3(9)] Section A.14.6.2.4 of Annex A to NFPA Standard 72; and
- (4) a written statement from a *registered design professional*, a person holding a license to engage in the business of installing, servicing and maintaining fire alarm systems issued by the New York Secretary of State pursuant to Article 6-D of the New York State General Business Law, or a master electrician licensed by the *Department of Buildings* and registered with the New York Secretary of State in accordance with such Article 6-D, certifying that a functional test has been conducted of the *fire alarm system* and the system operates as designed and in accordance with the Input/Output programming matrix. If such functional test cannot be

conducted at the time of submission of the request for inspection because installation work has not been completed, such written certification may be submitted to the *Department* in accordance with R105-01(c)(2)(A)(2).

- (B) Acceptance. The *Department* will review such *application* for inspection and supporting documentation for completeness and/or other purposes, and if satisfactory, will authorize an inspection.
- (3) Inspection and approval of fire alarm system installation
- (A) Availability of documents. [The] A printed copy of standard-size (24" x36") [size] set of approved [original] engineering drawings of the *fire alarm system design and installation*[, pursuant to R105-01(c)(1)(C)], and a set of "as built" *design and installation documents* of the installation, pursuant to R105-01(c)(2)(A)(2), shall be made available for inspection by the *Department* representative at the time of inspection of the *fire alarm system* installation.
  - [(B) Filing with Department of Buildings. The "as built" *design and installation documents* submitted to and accepted by the *Department* will be electronically filed with the *Department of Buildings* by the *Department* as part of the applicant's *Department of Buildings* application, unless another manner of filing such documents with the *Department of Buildings* is prescribed by the *Department*.]

**NEW YORK CITY LAW DEPARTMENT  
DIVISION OF LEGAL COUNSEL  
100 CHURCH STREET  
NEW YORK, NY 10007  
212-356-4028**

**CERTIFICATION PURSUANT TO  
CHARTER §1043(d)**

**RULE TITLE:** Professional Certification of Fire Alarm Design and Certification

**REFERENCE NUMBER:** 2022 RG 055

**RULEMAKING AGENCY:** FDNY

I certify that this office has reviewed the above-referenced proposed rule as required by section 1043(d) of the New York City Charter, and that the above-referenced proposed rule:

- (i) is drafted so as to accomplish the purpose of the authorizing provisions of law;
- (ii) is not in conflict with other applicable rules;
- (iii) to the extent practicable and appropriate, is narrowly drawn to achieve its stated purpose; and
- (iv) to the extent practicable and appropriate, contains a statement of basis and purpose that provides a clear explanation of the rule and the requirements imposed by the rule.

/s/ STEVEN GOULDEN  
Senior Counsel

Date: August 11, 2022

**NEW YORK CITY MAYOR'S OFFICE OF OPERATIONS**

**253 BROADWAY, 10<sup>th</sup> FLOOR**

**NEW YORK, NY 10007**

**212-788-1400**

**CERTIFICATION / ANALYSIS**

**PURSUANT TO CHARTER SECTION 1043(d)**

**RULE TITLE: Professional Certification of Fire Alarm Design and Certification**

**REFERENCE NUMBER: FDNY-30**

**RULEMAKING AGENCY: Fire Department of New York**

I certify that this office has analyzed the proposed rule referenced above as required by Section 1043(d) of the New York City Charter, and that the proposed rule referenced above:

- (i) Is understandable and written in plain language for the discrete regulated community or communities;
- (ii) Minimizes compliance costs for the discrete regulated community or communities consistent with achieving the stated purpose of the rule; and
- (iii) Does not provide a cure period because it does not establish a violation, modification of a violation, or modification of the penalties associated with a violation.

/s/ Francisco X. Navarro

Mayor's Office of Operations

August 11, 2022

Date