

**CASEY QUISOL (Intrepid Electronic Systems)**

**Q-01** Is it required to submit to DSA when **ONLY** changing the communication method on the fire panel at a public K-12 School?

Example: 2 POTs lines to Radio Mesh Network or Cellular. Local AHJ stated it's not their jurisdiction.

**A-01.**

**DANIEL TATE (Intrepid Electronic Systems)**

**Q-02. Fire Alarm Inspections:**

**a) When an organization is paid to perform Fire Alarm Inspection, why is a C-10 contractors license not required?**

Whereas, a State Fire Marshal "A" license or C-16 contractors license is required to perform fire sprinkler inspections.

*CCR Title 19 904.1: EXCEPTIONS: A business conducting inspections for a fee requires a State Fire Marshal "A" license or a Contractor State License Board (C-16) license.*

**b) Can you provide history to why this has occurred and should Title 19 be amended for fire alarm inspections?**

Background :this question has been brought up in various forms to CAFAA.

References:

CCR Title 19 904.1 requires contractors performing fire sprinkler ITM to hold a C-16.  
A CSLB inquiry this year responded and indicated a C-10 is not required for fire alarm inspections.  
CFC 2016 901.6 references the CCRs.  
CFC 2016 Table 901.6.1 references only NFPA 72.  
NFPA 72 2016 10.5.3.4 Means of Qualifications (for Inspection, Testing, and Service Personnel).

*10.5.3.4 Means of Qualification.*

*Qualified personnel shall include, but not be limited to, one or more of the following:*

- (1)\*Personnel who are factory trained and certified for the specific type and brand of system being serviced*
- (2)\*Personnel who are certified by a nationally recognized certification organization acceptable to the authority having jurisdiction*
- (3)\*Personnel, either individually or through their affiliation with an organization that is registered, licensed, or certified by a state or local authority to perform service on systems addressed within the scope of this Code*
- (4) Personnel who are employed and qualified by an organization listed by a nationally recognized testing laboratory for the servicing of systems within the scope of this Code*

SFFD has clarified to building owners that inspection and testing of fire alarms requires a C-10 or C-16. **See ATTACHMENT Q2 (on page 4) for reference.** This differs from the current scope as clarified recently by CSLB.

**DANIEL TATE (Intrepid Electronic Systems) – continued:**

A-02-a.

A-02-b

## Q2 ATTACHMENT - Daniel Tate (Intrepid)

### San Francisco Fire Department – Division of Fire Prevention & Investigation

June 28, 2018

Dear Building Owner:

Pursuant to state law and regulations, the San Francisco Fire Department (SFFD) requires that contractors installing, repairing, inspecting or testing any life safety equipment in San Francisco including, but not limited to, fire alarms, standpipes, and sprinkler systems, must possess a valid current C-10 (electrical) or C-16 (fire protection) contractor license issued by the California Contractors State License Board (CA-CSLB). The SFFD does not approve or accept work of the types listed above conducted by persons or companies known not to hold the required license. Employees of companies hired to work on life safety systems are also required to maintain a valid current Electrician Certificate (fire alarms) issued by the CA Department of Industrial Relations (CA-DIR) or a valid current Fire Sprinkler Fitter Certificate (sprinkler/standpipes) issued by the CA Office of the State Fire Marshal (CAL-OSFM). The SFFD recommends that building owners, or their representatives, request to view the associated certificates from those persons working in your building and on your behalf.

Furthermore, companies who service and test fire extinguishers are also required to obtain the applicable license classification from the CAL-OSFM. Employees of fire extinguisher companies shall also maintain a valid current Certificate of Registration (C of R) issued by the CAL-OSFM. The SFFD recommends that building owners, or their representatives, request to view the certificate from those persons recertifying and servicing your fire extinguishers prior to beginning work.

Always hire a licensed contractor to inspect your building's life safety systems and service your fire extinguishers. As a reminder, fire alarms and fire extinguishers shall be certified annually and sprinkler/standpipe systems shall be completely tested and inspected every five years. Please ensure after testing or servicing that the technician places a tag or sticker on the device which shall include the company name, company phone number, technician name, service date, type of service performed, and license number.

Valid current licenses and certificates may be verified at the following agency's websites:  
CA-CSLB (C1 O/C16): <https://www2.cslb.ca.gov/OnlineServices/Checklicenseii/Checklicense.aspx>  
CA-DIR (electrician): <https://www.dir.ca.gov/dlse/ECU/EiectCert/EiectCertSearch.asp>  
CA-DIR (trainee): <https://www.dir.ca.gov/dlse/ECUICA/ElectricianTrainees.pdf>  
CA-OSFM (fire extinguishers): <http://osfm.fire.ca.gov/strucfireengineer/strucfireengineerfe>

Daniel De Cassia  
Fire Marshal

cc: Capt. Mary M. Tse

**DANIEL TATE (Intrepid Electronic Systems) - continued**

**Q-03.** Code Interpretations: At last year's meeting, there was some discussion regarding a new system OSFM would be rolling out. I recall this would include new features like acknowledging or tracking pending code interpretation applications.

Can you provide an update?

**A-03.**

**JOHN BENNETT (Bennett Fire & Security)**

**Q-04. Chapter 7: Documentation: 7.5 Complete Documentation**

**a) What level of accuracy is required on completion documentation?**

Typically plans are drawn to show relatively accurate locations of devices (Horn/Strobes, Smoke Detectors, etc.) and Wire Routing.

**b) What is considered as an acceptable tolerance for installed devices?**

Recent Scenario: We had to shift a Ceiling Mounted Horn Strobe to an adjacent ceiling tile (24" from Center of the Room) due to a light fixture, and the Fire Inspector wrote a correction notice stating that the device was not installed per plan.

AHJ: Temecula Fire Dept.

**c) What is considered acceptable wiring diagrams for Completion Documentation? Most jurisdictions will accept point-point wiring on plans.**

Recent Scenario: AHJ wrote a correction notice because the wiring above a T-Bar ceiling was 2' from center as shown on plans.

AHJ: Temecula Fire Dept.

<b>A-04-a.</b>
<b>A-04-b.</b>
<b>A-04-c.</b>

**JOHN BENNETT (Bennett Fire & Security) - continued**

**Q-05. Chapter 26: Supervising Station Alarm System 26.6.6.3 Single Communication Path**

Many AHJs are not allowing Sole Path IP Communication because they want to see that all routers, power supplies, etc. are CSFM listed and have 24-hour battery back-up.

I thought the purpose of the more frequent 60-minute supervision and the 200 Second Communication failure was to accommodate the pathway limitations.

**Do all of the routers, switches, and devices between the FACP IP DACT and the Central Station Receiver require CSFM Listing and 24-hour battery back-up?**

A-05.

**JOHN BENNETT (Bennett Fire & Security) - continued**

**Q-06. CSFM Compliance:** Telguard, Napco, and Bosch have been deemed non-compliant as a communication path by a local AHJ (even though UL / FM/ ETL and CSFM have approved the products) because the signals are routed through the manufacturer's NOC, and the NOC is not listed as a Central Station, so,

- a) is it therefore deemed non-compliant?
- b) Is the jurisdiction justified in banning those products and in their jurisdiction?
- c) Or should they be accepted with the UL / FM / ETL and CA State Fire Marshal Listing?

AHJ: Temecula

A-06-a.
A-06-b.
A-06-c.

**Q-07. Agency Dispute:** When there is a dispute on Code and application with a local AHJ, are there any resources at the State Level to help arbitrate/mitigate disputes with local AHJs?

Posed by : ADT  
AHJ: Temecula

A-07.
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**JOHN BENNETT (Bennett Fire & Security) - continued**

**Q-08. Change of Communication Paths**

- a) Does a change in communication paths require a Full Fire Alarm Submittal?
- b) Does a change in communication paths trigger full building compliance to most recent Fire Code?

A-08-a.
A-08-b.

**TONY LOCATELLI (Intrepid Electronic Systems)**

**Q-09.**

- a) **In new buildings that are under state jurisdiction, what installation requirements do you require for the Emergency responder radio coverage systems that are in a low rise structure?**
- b) **Specifically, are lateral runs outside of the riser required to be in conduit?**

2016 NFPA 1221 Section 9.6.2.1.1 States where a two-way radio communications enhancement system is used in lieu of a two-way in-building wired communications system, it shall have a pathway survivability of Level 1,2,or3.

- c) **If the application does not meet this section (building isn't required to have firefighter phones), can the survivability level be 0?**
- d) **If not, please cite the code section that requires a higher level of survivability.**

A-09-a.
A-09-b.
A-09-c.
A-09-d.

**KEVIN GREEN (PyroComm)**

**Q-10.** NFPA 72, 2016 edition, Section A.18.4.5.3, indicated that, “ The intent of this section is to require the use of low frequency signal in areas for sleeping and in areas that might reasonably be used for sleeping . For example, this section requires a low frequency audible signal in a bedroom of an apartment and also in the living room area as it might be have sleeping occupants.”

**Are low frequency audible devices required in living rooms?**

**A-10.**

**Q-11.** When voluntarily replacing the telephone line monitoring set-up to a GSM cellular dialer for an existing fire alarm system, is a permit required?

**A-11.**

**KEVIN GREEN (PyroComm) - continued**

**Q-12.** 3. We understand that the high-rise required for conduit & “Class A” circuits as indicate in CFC 2016 edition, Section 907.6.1 is going to be removed as part of the next adopted CFC.

**For high-rise buildings that are being designed now and will be permitted before the adoption of the next CFC (i.e. January 2020), will conduit & Class A circuits be required?**

**A-12.**

**KEVIN GREEN (PyroComm) - continued**

**Q-13.** CBC 2016 edition, Section 1009.8, indicates that two-way intercom system are required at the landing serving each elevator or banks of elevators on each accessible floor that is one or more stories above or below the level of exit discharge. Section 1009.8.1 indicates that communication shall be between each required location (i.e. station) and a “central control point location” approved by the fire department.

- a) Is the control point for the master two-way intercom location to be installed next to the FACU?**
  
- b) Is 2-hour rated intercom cable required for the two-way intercom system in a building that is only being built with 1-hour construction?**

**A-13-a.**

**A-13-b**

**Chris Shimaoka (National Fail Safe)**

**Q-14.** Is this going to be legal: **if the city wants to deviate from California Building and fire code, will all fire alarm companies have to comply whether the ordinance is approved or not with the city plan checkers?**

For example: City of Los Angeles Fire is proposing, for their city ordinance, to make full visual coverage, i.e. closets, single person offices, small storage, every room. They had stated once this is proposed they are going to enforce this even if the ordinance is not approved yet. This is well above the California building and fire code. Section 907.5.2.3.1.

**A-14.**

**Chris Shimaoka (National Fail Safe) – continued:**

**Q-15.** When doing a tenant improvement on an approved existing system, we are adding visual devices in compliance in the tenant improvement area, this will be upgraded, to current code. We are not replacing the existing fire alarm system. **Do we need to upgrade the visual requirements through the entire building?**

For example - High rise retrofit ordinance #163836 and #165319 – City of Los Angeles Fire Department. The city is trying to make a visual upgrade through the entire building, when all we are doing is a Tenant improvement, we are not replacing the panel, so this is not a retrofit. They are quoting the high rise retrofit ordinance to try to make this happen.

**A-15.**

**Q-16.** According to NFPA 72, 18.5.5.4.1 and 18.5.5.4.6, the height of a visual device cannot exceed 30 feet. **Can you place a high candela strobe above the 30 feet ceiling height?**

For example: The NFPA states 30 feet high, but a high candela visual device, as in 177cd, can cover a room 68' X 68'. This should be able to be mounted above the 30 feet height.

**A-16.**

**Chris Shimaoka (National Fail Safe) – continued:**

**Q-17.** In reference to CBC and CFC section 907.5.2.3.1 - are visual devices required in phone rooms and/or quiet rooms? Most phone and/or quite rooms have only one seat, and this is just a temporary stay, this is not a long-term area. Also, these rooms are not sound-proof.

**A-17.**

**Q-18.** Some cities are asking for the smoke detector in the elevator lobby to be on a supervisory signal. This should be in an alarm condition. **Is there some clarification for this?**

**A-18.**



**Chris Shimaoka (National Fail Safe) – continued:**

**Q-19.** At time of installation, duct detectors were ‘alarm condition’. The new city code ordinance is now ‘supervisory conditions’. **Can we mix and match ‘supervisory conditions’ and ‘alarm conditions’, or does it have to follow building standard?**

**A-19.**

**Q-20.** In cities where the duct detector is a ‘supervisory condition’, when installing smoke detector in lieu of duct detector, does the smoke detector have to be ‘supervisory condition’? This is mounted on the ceiling in a room.

**A-20.**

**Chris Shimaoka (National Fail Safe) – continued:**

**Q-21.** Some cities have both fire and electrical plan checks. **Can the electrical department change the fire alarm layout after we get approval from the fire department?**

**A-21.**

**Skip Vandeventer (JCI)**

**Q-22. High-rise Class A wiring:** CBC/CFC 907.6.1.1 requires Class A wiring for signaling line circuits, initiating circuits, and notification circuits in high-rise buildings.

**Is there any movement to remove or modify this requirement in the next (2019) edition of these codes?**

A-22.

**Q-23. Fire Service Access Elevator temperature and smoke interface**

NPFA 72 21.5.2 Requires the temperature and presence of smoke in Fire Service Access Elevator lobbies, machine rooms, control rooms, machinery spaces, or control spaces be continuously monitored and displayed on a building fire alarm system annunciator located at the fire command center. Although chapter 21.5.3 states this display can be displayed on a “standard” emergency services interface, many jurisdictions are requiring such a display. Chapter 18.11 provides no guidance for this interface.

**Can the state provide guidance on what is and is not required on this display?**

A-23.

**Skip Vandeventer (JCI) - continued**

**Q-24. Anti-ligature specifications:** Many projects are requiring anti-ligature cages/covers for fire alarm peripherals.

**a): Considering there is no published or accepted standard addressing anti-ligature devices, can your agency provide specific requirements for these items?**

**b) Would such cages or covers require SFM BML approval?**

A-24-a.

A-24-b

**JEFF GREGORY (Battalion One)**

**Q-25.** I received a “denied plan check” on a set of plans I submitted back in May, stating that “The City of Oakland Fire Department is requiring a 15% maximum voltage drop for all NAC Circuits”. But researching their local City Amended Codes, dated 8-1-18, there is no mention of this requirement. I have one NAC circuit that has a 16.18% voltage drop, well within the 20% drop allowance by NFPA 72 Section 10.6.7.2.1.1.

**a) How can a city request a change in code without notice or published statement?**

**b) Is this code retroactive based on date of submittal?**

**A-25-a.**

**A-25-b**

**JEFF GREGORY (Battalion One)**

**Q-26. Why are a full set of plans and submittal package required for submittal, approval, and inspection for a change of monitoring service only?**

**A-26.**

**SAGIV WEISS-ISHAI (San Francisco Fire Dept.)**

**Q-27. Definition of an “Automatic Fire Alarm System”**

- a) What is the definition of an “Automatic Fire Alarm System” per the CBC and CFC ?
- b) Is it the Same as an “Automatic Smoke Detection system” ? Refer to CSFM Code Interpretation 17-003.

A-27-a.
A-27-b

**Q-28. CBC-2016 Section: 1010.1.9.9 Electromagnetically locked egress doors.**

- a) Is the FA system require to automatically unlock these doors upon activation ?
- b) Could these doors remain locked (via a backup battery) when there is a power outage in the building but the FA system has not been activated ?

A-28-a.
A-28-b

**SAGIV WEISS-ISHAI (San Francisco Fire Dept.) - continued**

**Q-29. CBC-2016 403.5.3 Stairway door operation: Are locked stairway doors in high-rise buildings required to be unlocked automatically upon activation of the FA system ?**

A-29.

**Q-30. Emergency Voice Alarm Communication Systems (EVACS):**

- a. Is it required to have ALL pre-recorded messages in the English Language?
- b. Is it permitted to program Non-Fire Emergencies voice messages (such as active shooter, earthquake, etc.)?
- c. Is it required to have an override microphone for all EVACS?
- d. Is it acceptable to use non-listed FA speakers for EVACS?
- e. Is an EVACS speaker required in each private office in a high-rise office building?

A-30-a.

A-30-b

A-30-c.

A-30-d.

A-30-e.



**SAGIV WEISS-ISHAI (San Francisco Fire Dept.) - continued**

**Q-31. Is it acceptable to have an automatic cut-off time for a Fire Alarm system notification with horn-strobes ? and/or EVACS ?**

A-31.

**Q-32. Is it required to have a smoke detector above a dedicated function FA control unit ?**

A-32.

**Q-33. Is it required to connect duct detectors to a sprinkler monitoring system control unit in facilities without a building FA system ? If the answer is no – what monitoring is required for these duct detectors?**

A-33.

**Q-34. ANSUL**

- a) **Is it required to connect an hood and duct suppression system (Ansul) to a Voluntary/Non required building FA system ?**
- b) **Is it required to connect an ANSUL system to a sprinkler monitoring system ?**

A-34-a.

A-34-b

**SAGIV WEISS-ISHAI (San Francisco Fire Dept.) - continued**

**Q-35. Is it acceptable to provide interior audible and visual notification appliances as an addition to a sprinkler monitoring system in facilities without a building FA system ?**

**If yes - is it required to be throughout the facility ?**

**A-35.**

**Q-36. In mixed A-2 and R-2 building with 20 dwelling units and 5 stories above an A-2 restaurant - is it required to provide notification system in the A-2 restaurant ?**

**A-36.**

**Q-37. Is it required to have shunt trip function for an hydraulic LULA elevator installed per ASME A17.1-2004 Section 5.2 ?**

**A-37.**

**Q-38. Is it required to monitor ERRCS floor antennas per NFPA 1221-2016 via the building FA system?**

**A-38**

**SAGIV WEISS-ISHAI (San Francisco Fire Dept.) - continued**

**Q-39. ERRCS EQUIPMENT**

- a) Is ERRCS equipment required to be UL listed to UL 2524 ?
- b) Is it required to be CSFM listed ?

A-39-a.
A-39-b.

**Q-40. Where is an acceptable location for a 2-Way ECS control unit in a low-rise and High-rise buildings?**

A-40.
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**SAGIV WEISS-ISHAI (San Francisco Fire Dept.) - continued**

**Q-41. Are strobes required to be installed in office buildings in the following rooms: Huddle, Phone, Wellness, Mothers, Cozy, Hotel, War, etc. rooms ? If yes – per which code section?**

**A-41.**

**Q-42. Fire alarm systems and components shall be California State Fire Marshal **approved and listed** in accordance with California Code of Regulations – **What does it means “approved by” the CSFM ?****

**A-42.**