

PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 28, 2015
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: NOVEMBER 12, 2015 (no later than 5:00 pm)

Date: October 28, 2015

From:

Lawrence Shulman
Name (Print or type)

Lawrence Shulman
(Signature)

-- Individual

Agency, jurisdiction, chapter, company, association, individual, etc.

<u>3087 Windmill Canyon Drive</u>	<u>Clayton</u>	<u>CA</u>	<u>94517</u>
Street	City	State	Zip
<u>larryshulman@earthlink.net</u>	<u>415-973-8737</u>		
Email address	Phone number		

I do not agree with:

The Agency proposed modifications As Submitted on Section No. Chapter 80, NFPA 13, Section 25.1

and request that this section or reference provision be recommended:

Approve Disapprove Further Study Required Approve as Amended

Suggested Revisions to the Text of the Regulations:

Add the following underscored text:

Add Section 25.1(5) Revise Section 25.1 as follows:

25.1 Approval of Sprinkler Systems and Private Fire Service Mains. The installing contractor shall do the following:

(1) Notify the authority having jurisdiction and the property owner or property owner's authorized representative of the time and date testing will be performed.

(2) Perform all required testing (see Section 24.225.2)

(3) Complete and sign the appropriate contractor's material and test certificate(s) (see Figure 24.125.1)

(4) Remove all caps and straps prior to placing the sprinkler system in service

(5) Upon system acceptance by the authority having jurisdiction a label prescribed by Title 19 California Code of Regulations, Chapter 5 shall be affixed to each system riser indicating completion of five year servicing.

Reason: There is confusion in the fire sprinkler industry as to what level of servicing should be indicated on the tag for a new system. Some C-16 contractors show completion of annual servicing on a new system tag, but NFPA 13 requires all of the same inspection, testing, and flushing required by NFPA 25 California Edition for a five year certification. Therefore, five year servicing should be indicated on the tag.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.