INTERPRETIVE MEMORANDUM 2006-04

To: Licensed Architects
Licensed Engineers
Licensed Locksmiths
Licensed Burglar Alarm Contractors
Arkansas, Louisiana and Texas Locksmith Association
Louisiana Life Safety and Security Association
Louisiana Automatic Fire Alarm Association
Licensed Fire Alarm Contractors
Felicia Cooper, Deputy State Fire Marshal Administrator
Stephen Gogreve, Manager of Inspections
Boyd Petty, Manager Licensing Section
Pat Aronstein, Manager of Inspections
Plan Review Staff

From: Henry H. Fry, Deputy Assistant Secretary

Date: March 8, 2006

RE: MAGNETIC LOCK RELEASING DEVICES

This office enforces the requirements of the NFPA 101 Life Safety Code for all new installations of special locking arrangements as outlined in MEMORANDUM 2006-03. Access-controlled egress doors are reviewed for compliance with NFPA 101. NFPA 101 has long prescribed that, "*A latch or other fastening device on a door shall be provided with a releasing device that has an obvious method of operation and that is readily operated under all lighting conditions.*"

The 2003 edition of NFPA 101 included an option to the requirements of access-controlled egress doors, permitting the use of listed panic hardware or fire exit hardware that, when operated, unlocks the door, in lieu of providing a sensor arranged to detect an occupant approaching the door. NFPA recently published the 2006 edition of the Life Safety Code whereby the option has been removed.

The Annex of the 2006 edition of NFPA 101 contains an explanation as to why the option was removed. It states in part, "*It is within the intent of this requirement that switches integral to traditional door knobs, lever handles, or bars, and that interrupt the power supply to an electromagnetic lock, be permitted, provided that they are affixed to the door leaf.*" It further states, "*It is not the intent to require doors that restrict access but comply with 7.2.1.5.9 to comply with the access-controlled egress door provisions of 7.2.1.6.2.*"

The NFPA 101 Life Safety Code requires fire protection features that will provide a minimum acceptable level of safety. Based on code intent and the observations presented above, it is the interpretation of this office that a door provided with an electromagnetic lock and a mechanically activated releasing device affixed to the door that when activated, results in direct interruption of power to the electromagnetic lock, will not be required to comply with the provisions for access-controlled egress doors provided the following conditions are met:

1) The releasing device shall have an obvious method of operation that is readily operated under all lighting conditions.

2) Where power is lost or removed from the principal locking system components, the latching hardware shall FAIL-SAFE and continue to provide "positive latching" where required by other sections of the code. Automatic relocking upon the return of power to all of the principal components shall be permitted, however door operation for egress from the building must be obvious and unimpeded at all times.

New installations of this locking type are required to be installed by a Locking System Contractor that is licensed with this office and shall be submitted to this office for review, as outlined in **INTERPRETIVE MEMORANDUM 2006-03**. Please note that "touch sense" type releasing devices are not considered a mechanical means of releasing and will be required to comply with the provisions for access-controlled egress doors.

Refer to Interpretive Memorandum 2006-03 for further information regarding submittal requirements for a "SPECIAL LOCKING ARRANGEMENTS REQUEST FOR INSTALLATION".

Should you have any questions regarding this matter, please contact the Plan Review Section of this office in Baton Rouge at 1-800-256-5452 or (225) 925-4920.

HHF/DZ/LJD