

**THE LOUISIANA AUTOMATIC FIRE ALARM ASSOCIATION
NORTHERN REGIONAL MEETING
BOSSIER CITY, LA
JUNE 15, 2001**

1. If a user has an employee with an electrical contractors license, how far can they go in the following activities without contracting with a licensed fire alarm or suppression system contractor:

- A. Adding devices to their system.**
- B. Inspecting their system.**
- C. Changing the type of devices.**
- D. Servicing their system.**

In essence, what are the limitations of this customer within the scope of their activities with their fire protection system?

- *Per Louisiana Administrative Code (LAC) 55:V:3063 C, an electrical contractor is limited to the installation of wiring, conduit raceways, and/or devices for fire detection and alarm systems. Only a licensed fire alarm firm could inspect or service the system. In this instance, the customer has an employee who holds an electrical contractors license. In my opinion, the person is acting in his capacity as an employee of the company not as an independent contractor. Based on this scenario, the customer could not do any of the work listed with this employee.*

2. Can a photoelectric smoke detector be replaced with an ionization smoke detector (or vice versus) without an exemption?

- *It depends on the situation. Why is the detector being replaced? Is it in response to a service call? Is it in response to an inspector's citation? Is the question only addressing one device or an unlimited amount? This office needs more information to adequately answer the question.*

3. We recently hired personnel who worked for another licensed firm and had been laid off prior to the renewal date of their personal licenses and worked another (non fire alarm related) job. In order to renew their licenses (without retaking the test) within the two (2) year period, it is necessary to:

- A. Pay \$20.00 to change firm.**
- B. Pay full value of license for the year of original renewal date to end of two (2) year period, plus late fees.**
- C. Renew license (at full renewal rate) when the two (2) year period completes.**

The argument of the State Fire Marshals Office is that the individual could be using their license during that year when they were employed at a non-fire related company. It is charged as if the license remained in effect during that full one (1) year since the original renewal date.

Under these types of circumstances, particularly when the time remaining in the two (2) year period is less than six (6) months, it seems that the corrected license fee should be pro-rated or the renewal time should be for a full year. Please advise when the fees are charged as described.

LAC 55:V:3017 F requires a firm and/or employee to notify this agency within 10 days of termination of employment. Once made, then the license is suspended. In this particular situation, it is unclear whether the notification was made or not. Assuming notification was made, then the fees assessed would be only be \$20.00 to revise the license to the new firm if this occurred prior to the licenses anniversary date or expiration date. If re-application were made on or after the anniversary date, then the fees assessed would be just the renewal fees. If notification was not made, then all renewal fees and appropriate late fees would be charged. The key here is to make the required notification of termination.

4. We continue to submit Installation and Maintenance manuals with drawings for review of systems. It seems that as more information is provided, less use is made of that data by the Reviewers. We continually address compatibility of components, and details of systems that are included and obvious in the submittal data. What can be done to reduce these time consuming activities and to ensure that some Reviewers develop a memory base that will prevent repeating the resolution of the same questions project after project, submittal after submittal?

- *Fire alarm shop drawings submittals are only one aspect that our office reviews for code compliance. Issues that appears to be obvious to you (because you have been dealing with your particular project for a considerable more amount of time), may not always be obvious to the plan reviewer (who may only have your submittal for less than an hour). Please also understand that our staff has range of less than one month to nine years of reviewing fire alarm systems and the only real solution is experience, and it takes time. All I can suggest is that you re-evaluate your submittals and imaged that you are a plan reviewer looking at this project for the first time and ask yourself the question: Can I find everything in this submittal?*

5. The Board of Registration for Professional Engineers meets on a quarterly basis with the State Fire Marshals Office about issues that affect both organizations. There has been an issue with respect to when a PE should be involved in drawing/design of alarm and suppression systems versus a NICET Level III individual. Can the LAAFAA and other similar associations e.g. Sprinkler, participate in these discussions to ensure that our industries interest are protected?

- *Currently, there are no scheduled meetings between this Office and the Engineers Licensing Board on this issue. Any questions concerning the associations involvement in this issue should be directed to the Engineers Licensing Board. The only involvement this Office has had was to review a proposed draft of legislation that establishes thresholds of when a design professional would be required. This office made it's recommendations and will not be involved any further until legislation is proposed by the State Legislature.*

6. Can a list of fines assessed be provided periodically so we can be aware of where/who some of the problems are in our industry?

- *This is has not been done in the past because the agency felt that the list would be used by competitors to steal customers and would penalize good firms who happened to make a mistake. However, after recent discussions within the agency, I feel that this type of list may have more benefit to the industry than the possible negative impact to some firms. I will not publicize names of firms until such time as the Administrative Law process was complete or the case was settled.*

7. The questions and answers from the January 21, 2000 LAAFAA Meeting in Baton Rouge were never distributed during the meeting or since, I believe. I understand that the SFM had contacted NFPA for assistance with one of the submitted questions and this has delayed the distribution of the questions and answers. If the SFM has not received the anticipated cooperation from NFPA, could the remaining questions and answers be distributed to our industry?

- *We apologize for this inconvenience and will distribute those questions and answers today!*

8. Your office recently distributed several interpretive policy memos (2001-2, 2001-4, 2001-5, 2001-6, 2001-8). Are 2001-3 and 2001-7 issued? If so, can a copy be furnished to this Association so that a complete file can be

maintained?

- *Currently 2001-3 has not been issued but we will provide a copy of 2001-7 for the Association today. Interpretive Memorandum 2001-7 subject matter is “Local Fire Department Conformation of Proposed Fire Department Connections and Fire Hydrants.”*

9. Memo 2001-5 has been needed for some time. As discussed at previous meetings, there is no such thing as a stand alone suppression system, except in rare cases when pneumatic rate of rise HAD actuation is used, mainly with machinery space CO₂ systems. Clean agent systems per NFPA 2001 require early warning electronic detection systems so potential fires can be quickly detected and the agent released at early stages of the fire. It is critical that a knowledgeable and properly certified firm design, install, and service these systems. The same firm should be knowledgeable in all aspects of NFPA 72, and various suppression standards such as NFPA 11, 12, 2001, and standards for suppression systems, not to mention NFPA 75. This thought is backed up by your offices project involvement in investigation of an incorrectly designed and installed total flooding FM-200 system. This writer was recently asked by firms not members of this Association to interpret your memo no. 2001-5. These firms feel that a Class C firm could install or inspect the suppression system, and a Class D firm could install or inspect the detection system. In reality, automatic suppression systems are a single system, not two independent systems. Boyd Petty has previously advised this writer that if either the control panel or the cylinder needed yellow or red tagging, then the complete system was to be considered as yellow or red tagged. I agree with this concept. With this in mind, should this memo be reissued to clarify that a single company installing and servicing these systems must be certified as B or C, and D?

On the surface this request seems reasonable; however, I would like to discuss this situation in more detail with your association and internally within the agency to fully explore the ramifications this requirement would have. Please contact me for further discussions.

10. The Louisiana State Contractors Board regularly issues a listing of companies whose license has been suspended or revoked. This provides useful information to other licensed contractors, and end users. Can your office issue such listing, perhaps on a quarterly basis, so the industry can also have knowledge of firms having been fined, licenses suspended, etc?

- *I have been contemplating this type of action. I will instruct my staff to begin tracking this information and develop a system whereby we can notify your industry.*

11. I was recently told by a member of your Plan Review section that the exemption request form was not required to be submitted for non-required systems. Can you confirm this?

- *This office policy is as follows:*
 - *Modifications to “required” fire alarm systems shall be submitted on a Fire Alarm Exemption Request Form.*
 - *Installation of a new non-required fire alarm systems shall only be submitted on a Non-Required Fire Alarm Exemption Request Form.*
 - *Modifications to non-required fire alarm systems are not required to be submitted on an exemption request form.*

12. Submittal requirements for required fire alarm and chemical suppression systems are described in detail on the plan review application checklist. This writer has recent experiences whereas the reviewer cites several items not required by the checklist, and yet cites them as deficiencies in the review letter. It is my understanding Mr. Jean Carter will address this matter.

A. Will his response be included with Association questions?

- *Yes*

B. The initial letter was written as specific correspondence from a firm regarding a specific submittal.

Shouldn't your office respond to the specific letter? Since the issues raised affect all firms, this writer has no problem with your office addressing the letter through this method; however, be advised that the original correspondence on this issue was not from this Association.

- *The State Fire Marshal is responding today via this presentation.*

C. Please clarify what response you expect when apparent deficiencies in submittals are listed in your review letter. The owner and in most cases, the Professional of Record is not in a position to respond directly to the apparent deficiencies. In the past, I have replied to the deficiency issued, by routing my correspondence through the owner or Professional of Record, who in turn uses their fax cover sheet to transmit the response. Is this acceptable to your office?

- *Yes, this method is acceptable and this office requires that the Professional of Record be involved and review all correspondence from contractor(s) prior to transmitting the information to the Office of State Fire Marshal.*

D. Is your office supposed to respond to the owner or Professional of Record, and the contractor? In some cases, it creates problems if the district office does not have a response acknowledging acceptance of the clarifications.

- *This office responds directly to the applicant for each project submitted. If a project is required by state law to have a Professional of Record, the State Fire Marshal Office communicates directly to the Professional of Record. If a Professional of Record is not required, the State Fire Marshal Office communicates directly to the Owner. The applicant is always a Professional of Record or building Owner. The applicant is not a contractor.*
- *It is a policy of the Office of State Fire Marshal, that all initial project review letters and subsequent project amended letters include the applicable state fire marshal district office on the letters cc list.*

Comment 1. I assume you reviewed our drawings under the 1996 edition of NFPA 2001. Paragraph 3-1.2.2 reads the same in both the 1996 and the 2000 edition. It would be helpful when citing deficiencies if your office could show the year in addition to paragraph cited.

- *SFM Response: On every review letter published by this office, the promulgated code edition of the NFPA Life Safety Code is captured within the heading on the right hand side of the first page. The Life Safety Code is this office's base code for review. Although the promulgated editions of the other 110 NFPA standards are not currently referenced by edition on the review letters, this request has been taken into consideration and will be discussed within the office.*

Comment 2. Our company takes great pride in our plan review submittals. We go to great pain in preparing what I personally think is the best submittal package of all licensed contractors. In this particular submittal, I attached the Chemical Fire Suppression System Review Checklist, making sure all items were complied with. In addition, I wrote a cover letter and also included a copy of the field inspection report.

- *SFM Response: This office is pleased and appreciative that you and your company go to great lengths to make sure your submittals are correct and complete. This office can only aspire that all licensed chemical suppression contractors have the same professional goals for SFM submittals as your company does.*

Comment 3. I am very active with our State Fire Alarm Association. We are told at every meeting that we must follow the checklist provided by your office. In this case, I feel that I followed it 100%.

- *SFM Response: This office does not mandate utilization of the eight different checklists currently published by this office. We have always strongly encouraged use and completion of the checklist. However, if we receive a project and no completed checklist accompanies the project, we will still review the project. If we determine that the submitted information is too vague to complete the review, we may, upon discretion, request that the applicant complete a checklist and attach any inadvertently missing/incomplete information so we can complete your review. Following the checklist and providing the information requested in the checklist has proved invaluable in increasing the accuracy of submittals to this office. While the checklist utilization is strongly suggested, it is not required by this office.*

Comment 4. I agree that paragraph 3-1.2.2 calls for submittal of the items requested by the subsequent plan review letter; however, these items are not on the Chemical System Checklist, which we are told is the bible of a proper submittal.

- *SFM Response: Although this office developed the checklists and we certainly encourage use of them, neither we nor the checklists are infallible. This office was aware that the checklists, originally published July 25, 2000, would go through some refinement over time. Your comments about the requirements of 3-1.2.2 not being iterated in the checklist are well received. We will investigate adding this to the checklist.*

Comment 5. I have submitted 20 plus FM-200 systems in the last couple of years and never have I been cited on these items before.

- *SFM Response: This offices review letter of April 30, 2001, was comprised of only four items. Three of the items were listed in the deficiencies portion of the review and one item was listed in the cautionary/information portion of the review. Approximately a year ago, this office may have allowed the deficiencies listed as Items 1., 2., and 3. of this offices letter to be diverted to the cautionary/information portion of the review. However, over the past several months, this office has improved the quality and review depth of chemical suppression reviews. Just as your office constantly strives to maintain high standards, our office does as well. You are now seeing citations on our review letters that used to not be there because this office is constantly dedicated to improving our quality of reviews.*
- *Please do not look unfavorably on the deficiencies cited in our reviews. You and this office are both dedicated to providing and maintaining safe buildings for all inhabitants. Our goal is not to second guess anyone our goal is to continuously strive to give to the public the best life-safety review in the country, and as you know, constant striving for improvement dictates ever changing quality control at what we do here. Again, we are more than glad to investigate capturing the items listed as deficiencies in this offices review letter into the body of the Chemical Fire Suppression System Checklist & Fee Schedule. We are appreciative that your concern for a clean slate review letter is a driver for improvements to our existing checklist.*

Comment 6. The bottom line is that each review seems to come up with items that have never been required. The rules keep changing, and we look incompetent to our clients, when they receive a letter with a long list of deficiencies.

- *SFM Response: Again, this office is not trying to second guess you are anyone making a submittal to us. If you take a look at the quality of chemical suppression review letters published by this office, say 10 years ago, and compare it with a similar review of today, there is no doubt that the quality of review has greatly improved. It is not the opinion of this office that the rules have changed. It is the opinion of this office that what has truly changed is the quality of our reviews. What you are experiencing is a growing pain of ours and we invite you to buy into our dedication to improve our quality control. I appreciate that our dedication to quality control tends to camouflage itself within the body of our review letters as compared to several years ago, but we do invite you to consider and accept the dynamic state of work scope we are in, every day. Codes change. Code interpretations are created. Policy is created and/or changed. All of these dynamic situations play a role in our constant striving to better what we do. Ultimately, we need your respect and encouragement.*

Comment 7. Today's modern data or telecom facilities are all equipped with card key access. Opened doors are immediately reported to security monitoring stations. I really think automatic closing devises are really a non-issue in this setting. I would appreciate it if you would advise me how your office wants this particular item handled on submittal drawings.

- *SFM Response: NFPA 2001:3-3.3 requires automatic closures at all openings encapsulating the total flooding area. Regardless if initiating devises provide a signal to security monitoring stations, if the system dumps and there is a door or two in the open position for any reason, then the suppression agent may not be of sufficient concentration to suppress the fire in an efficient manner, or worse, could allow the fire to continue to burn out of control. This office will continue to require compliance with NFPA 2001:3-3.3.*

Comment 8. There are hundreds of other paragraphs that an individual reviewer could cite as deficient in any given submittal. It seems that those contractors preparing the best submittals get picked on for minor things,

while companies like the original installing company gets away with no submittal. Is your office fining the installer for doing the installation without approved plans, in accordance with licensing laws?

- *SFM Response: This office does not pick on any contractor or applicant. Unfortunately, you may feel that way sometimes, and we apologize for our lack of communication with you or any of your colleagues in the contracting industry. As supervisor of this office's fire suppression review team, I strive, as my team does, for consistency. As a point of reference, I personally proof each and every review letter draft prepared by my team members, before they get published. My number one goal is triple-fold: fairness/accuracy/consistency. As I mentioned earlier, this office is not infallible we make mistakes sometimes we are not consistent. However, as a supervisor, I know that consistency is a driving force, so as I proof each draft, I give confirmation to each of my team members that their letters are not singling out or burning any applicant or contractor. If this were discovered, that applicable reviewer would be formally counseled and severely disciplined.*
- *It is certainly not the intent of this office to circumvent any required review by this office. In other words, the installing contractor is mandated to submit plans for review the same as a subsequent maintenance contractor involved with the same life/safety system. What I invite you to consider is the possibility that the original installation of a suppression system could have been installed several years ago. With an original installation this old, it is highly possible that this office provided a much more cursory review than we perform now. It is also possible that the original contractor circumvented this office, with respect to a required plan review submittal. A lot has changed, with respect to quality control within this office, just as a lot has changed with quality control in your office. We both strive and grow, with a professional goal of being better than the day before.*

Comment 9. How do we make this work to where both your office and Fire Protection Contractors can be as efficient as possible? Time is money for both of us.

- *SFM Response. Both parties need to realize that we constantly strive to improve what we do. We need to communicate to each other better. We need to trust each other more. This office has the highest respect for companies like yours who are dedicated to quality control and the betterment of the industry. We are on that same bandwagon. Lets learn to ride that bandwagon together.*

13. Regarding the exemption form, can your office provide a checklist similar to the detection and chemical suppression form? It recently cost me \$40.00 (two submittal fees) for a non-required fire alarm system revision because the reviewer rejected the application because data sheets on the detectors were not submitted. It made little sense to me since data sheets, etc., are not required when submitting the initial system as a non-required system.

Your office was supposed to modify the plan review form to again include a signature line for the contractor and the owner/Professional of Record. What is the status of this revision?

- *We are currently working on guidelines of what needs to be submitted on the Required and Non-required Fire Alarm Exemption Request Forms to avoid this type of confusion. The guidelines shall also take into consideration the various office policies that concerns the Fire Alarm Exemption Request Forms. Let's discuss the issue about cut sheets for a non-required fire alarm system revision.*

14. Does state law allow for certified firm's use of a stamp on shop drawings? Stamps with NICET registration numbers, or certificates numbers maybe mistaken for Professional Engineer seals or some otherwise ungranted authority to "stamp" drawings, especially to the end user?

- *This question should be posed respectively to the engineers and architects licensing boards. The Fire Marshal's Office enforces L.R.S.37:155 (architects licensing law) as a courtesy, but shall not give any interpretation on the intent of this law.*

15. Last year, the Fire Marshal's Office instituted a procedure so that allows a maximum of 10 devices to be installed on a fire alarm system without the normal submittal process, provided the devices are called for in a plan review letter or an inspectors field report. This new procedure has been beneficial in that it reduces the cost of devices to the owner, and saves the Fire Marshal's Office manpower both in the review process and in the elimination of a "final inspection" by the Inspector.

The interpretive memorandum specifically mentions smoke and heat detectors, manual pulls and notification devices. Is the intent of the memo to limit initiation devices to those described in the memo...or to provide a guide that includes devices such as hood contacts, duct detectors, magnetic door holders and sprinkler tamper and flow?

- *After reviewing the request, it appears acceptable to include the following devices such as hood contacts, duct detectors, magnetic door holders and sprinkler tamper and water flow switches. These devices were omitted because the author of the policy failed to consider them and the main focus was not to include DACTs, because this would typically require the signaling system to be modified (i.e. Local to Remote Station). Please note that an “amended” memorandum shall be forth coming.*
- **Let’s look at Interpretive Memorandum 2001-2.**

The Fire Marshal’s Office has been lately concerned about fire alarm system in our daycare facilities, elementary, junior high and high schools. Primarily our focus is the functionality and maintenance of these systems. Our office is looking for input from your industry, so we can better understand the situation. We understand that your industry is likely to be contacted first if one of these facilities has a problem with their fire alarm system before the Fire Marshal’s Office is properly notified. Therefore the Fire Marshal’s Office would like for you to write down your responses to the following questions and please turn them in before you leave. You are not obligated to give your name or identify any facility. We thank you in advance for any information that you can provide.

**Are any of the previously mentioned facilities in your areas experiencing or recently experienced impairments with their fire alarm systems that would affect the functionality of the system?
What percentage value would you give of these impaired systems at these facilities to the overall number of facilities in any given parish?
Do any of these facilities contract to your company to provide routine inspection, maintenance and preventive maintenance?**