<table>
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<tr>
<th>Comment</th>
<th>No Affirmative Recommendation</th>
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<tbody>
<tr>
<td>1. Support comment. Comment sufficiently addresses the TAC’s concern(s).</td>
<td>X</td>
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<tr>
<td>3. No comment is needed.</td>
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<td>4. Straw Poll.</td>
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**Summary**
This proposed modification deletes an obsolete and unnecessary exception for smoke alarm interconnection requirements.

**Proponent**
Bryan Holland

**Chapter**
3

**Section**
318.4

**Commission Action**

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<th>AS</th>
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### Comments

**General Comments** Yes

**Alternate Language** No

### Related Modifications

### Summary of Modification

This proposed modification deletes an obsolete and unnecessary exception for smoke alarm interconnection requirements.

### Rationale

This proposed modification deletes the exception to the smoke alarm interconnection rule based on previous limitations of wired-only technology. With the wide availability of wireless interconnected smoke alarms, the exception is no longer needed and only serves to reduce life and fire safety in existing buildings that will most benefit from the installation and interconnection of smoke alarms.

### Fiscal Impact Statement

**Impact to local entity relative to enforcement of code**

This proposed modification will not impact the local entity relative to code enforcement.

**Impact to building and property owners relative to cost of compliance with code**

This proposed modification will not change the cost of compliance to building and property owners unless the cost of wireless alarms are passed on to the consumer.

**Impact to industry relative to the cost of compliance with code**

This proposed modification will increase the cost of compliance where the exception may have been applicable previously. Wireless interconnect smoke alarms are becoming common-place products that are readily available on the market today and have comparable costs to traditional hard-wired alarms.

**Impact to small business relative to the cost of compliance with code**

This proposed modification will not change the cost of compliance or impact small business.

### Requirements

**Has a reasonable and substantial connection with the health, safety, and welfare of the general public**

This proposed modification is directly connected to the health, safety, and welfare of the general public by removing an exception to smoke alarm interconnection rules that reduce life and property safety.

**Strengthens or improves the code, and provides equivalent or better products, methods, or systems of construction**

This proposed modification improves and strengthens the code by removing an obsolete and unnecessary exception in existing buildings only. Smoke alarm interconnection is essential for effective occupant notification of fire.

**Does not discriminate against materials, products, methods, or systems of construction of demonstrated capabilities**

This proposed modification does not discriminate against materials, products, methods, or systems of construction.

**Does not degrade the effectiveness of the code**

This proposed modification enhances the effectiveness of the code.

### 2nd Comment Period

**Proponent** Bryan Holland  **Submitted** 5/21/2019  **Attachments** No

**Comment:**

Please reconsider this proposed modification for approval. This exception was necessary based on the limitation of legacy-type smoke alarm products incapable of wireless interconnection. This is no longer an issue, therefore, this exception is no longer included in the IRC or NFPA 72. The interconnection of smoke alarms is essential for the effective notification and evacuation of persons in a home as early in the fire/smoke event as possible. This exception significantly reduces life-safety in existing homes undergoing alteration.
R314.4 Interconnection. Where more than one smoke alarm is required to be installed within an individual dwelling unit in accordance with Section R314.3, the alarm devices shall be interconnected in such a manner that the actuation of one alarm will activate all of the alarms in the individual dwelling unit. Physical interconnection of smoke alarms shall not be required where listed wireless alarms are installed and all alarms sound upon activation of one alarm.

Exception: Interconnection of smoke alarms in existing areas shall not be required where alterations or repairs do not result in removal of interior wall or ceiling finishes exposing the structure, unless there is an attic, crawl space or basement available that could provide access for interconnection without the removal of interior finishes.