



National Electrical Manufacturers Association

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June 1, 2017

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Subject: Public Comment on FBC-B, Section 2703 (Mod #6460)

Dear Commission,

Lightning protection requirements have been included in the Florida Building Code (FBC) since the very first edition. The 2001 FBC required lightning protection for hospitals (Article 419) and in the state requirements for educational facilities (Article 423). This edition of the code referenced the NFPA 780-1997 for compliance. The 2004 FBC added lightning protection to nursing homes (Article 420). This edition of the code continued to reference the NFPA 780-1997 for all three occupancy types. The 2007 FBC updated the reference to the NFPA 780-2004. There were no changes to the 2010 or 2014 editions of the FBC with regard to the lightning protection.

As stated in previous testimony, lightning remains the only naturally occurring hazard that is not uniformly addressed by the FBC. Protection against wind, rain, flood, and fire is a fundamental component of the code and all building construction in the state. However, protection against lightning is limited to just three occupancy types, though it can impact a building of any type, use, or occupancy. Furthermore, the occurrence of lightning is much greater than all other natural disasters combined and results in significant loss of life and property in the state.

The new Section 2703 has corrected this protection gap in the code. As written, only those buildings that would benefit from a lightning protection system will be required to comply with the rule. While the new rule continues to require compliance with the NFPA 780 standard, section 104.11 of the code clearly indicates "the provisions of this code are not intended to prevent the installation of any material or to prohibit any design or method of construction not specifically prescribed by this code, provided that any such alternative has been *approved*." Therefore, nonconventional or other alternative lightning protection components and systems are not automatically prohibited or excluded by the code. Evidence of this has been provided by Linda Joseph in her letter to you dated May 18, 2017 where she has listed 270 ESE installations that have been previously approved in the state of Florida, despite the NFPA 780 standard being in effect continuously since 2002. In short, there is nothing stated in the new rule that is product specific or anti-competitive in any way, shape, or form.

I continue to support FBC-B, Section 2703 and strongly encourage the Commission to make no changes or deletions at this time. Please continue with the new rule as published in the draft 2017 FBC.

Thank you for your consideration,

*Bryan P. Holland*

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