From: James Guinan [mailto:guinanassociates@gmail.com]

Sent: Thursday, September 16, 2021 12:30 PM

To: Madani, Mo

Subject: Comments - Existing FBC, Draft 2.1

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Dear Mr Mandini;

I applaud your effort on developing detailed inspection procedures and frequency for existing buildings.

While building collapse is a horrific tragedy, building fires and other emergencies are more frequent events which risk the lives and safety of the occupants.

Draft 2.1, section V.C briefly discusses Fire Alarms as follows: "Exit signs lighting and emergency lighting, along with voice annunciation systems and a functional fire alarm must [be] tested to confirm they are in good working condition." No inspection of Fire Protection systems are required in the Draft.

Attached are my recommendation for revised text for Section V

Also attached is a handy inspection and testing chart developed by the city of Phoenix AZ.

Thank You

James Guinan

p.s. I was a volunteer member of the New York City Building Codes Committee, Fire Protection Technical Committee from 2003 to 2014. We focused on Chapter 9 of and sections of other chapters of the new NYC Building Code, based on IBC.

To: Mr. Mo Mandini 16 Sept 2021

Subject: FBC Existing Building Inspections, Draft 2.1

Dear Mr. Mandini;

I applaud your effort on developing detailed inspection procedures and frequency for existing buildings.

While building collapse is a horrific tragedy, building fires and other emergencies are more frequent events which risk the lives and safety of the occupants.

Draft 2.1, Section V.C briefly discusses Fire Alarms as follows: "Exit signs lighting and emergency lighting, along with voice annunciation systems and a functional fire alarm must [be] tested to confirm they are in good working condition."

No inspection of Fire Protection systems are required.

I recommend the following revised text in Section V:

C. Emergency Lighting/Emergency Power

Exit signs lighting and emergency lighting shall be 100% tested. All required devices shall be present and each one tested when operating on both normal power, emergency power (when required by code), or battery power.

Emergency power systems shall be tested monthly and annually in accordance with NFPA 110 and Florida Building Code [insert code reference]. Verify that all code-required emergency systems and equipment are operational under normal and emergency power, and the emergency power system is not overloaded.

If testing has been performed by others, include a copy of their test report in this report.

D. Fire Alarm Systems

Emergency Voice Alarm systems shall be tested as required by the Florida Fire Prevention Code and NFPA 72 Chapter 14.

If testing has been performed by others, include a copy of their test report in this report.

Fire Alarm Systems shall be tested in accordance with the Florida Fire Prevention Code and NFPA 72 Chapter 14.

If testing has been performed by others, include a copy of their test report in this report.

E. Fire Protection Systems

Fire Protection Systems shall be inspected and tested in accordance with Chapter 633, F.S., and the applicable standards in NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems, which is incorporated by reference in Rule <u>69A-3.012</u>, F.A.C..

Non Water based fire extinguishing systems shall be inspected and tested in accordance with the appropriate NFPA standard.

If inspection and testing has been performed by others, include a copy of their report in this report.

The above text should be reviewed by the Florida State Fire Marshall, and coordinated with existing Florida codes.

Thank You

James Guinan