



NFPA 13

Section 5.2.2.2

APPA disagrees with adding more words to this subsection. Subsection 5.2.2.2.1.1 requires adjustments to flow test data that used to be guidance in the annex. In subsection 5.2.2.2.1.2 it requires a factor of safety of an arbitrary 10% if a flow test is not taken and the water authority does not provide a factor of safety. However, this section does not explicitly include private waterworks systems. We agree with Technical Committee voting member John August Denhardt in his approval comments – “While I have mixed feelings on this issue, I do feel that this issue does need guidance in the body of the standard. I'm still not sure this approach is the correct one. However, where is the committee statement? We developed a committee statement to attempt to draw out comments from the users of the standard.” We are asking the technical committee to review this section again for clarity.

Table 10.2.7.2.2

APPA disagrees with the proposed changes in this table. The proposed language under "Horizontal Distance (A)" is more confusing than existing language. We agree with Larry Keeping's negative with comment vote, “The change represented in this FR is more difficult to interpret and apply than the existing verbiage and could easily lead to errors or misunderstandings. For example, for "15 in. (375 mm) or less" it states that the minimum "B" dimension is 8 in (200 mm). However, 12 in. (300 mm) is less than 18 in. and the "B" may be as small as 4 in. (100 mm). Thus the FR wording is less technically accurate than the existing text, and should not be adopted.” We are asking the technical committee to review this Table to ensure that new language is clear and concise.