



## **NFPA 72**

### 14.2.2.2.3

APPA disagrees with the proposed language as it is not necessary in the body of the code. These three sections will only cause confusion. We agree with Technical Committee member Joe Scibetta's Affirmative with Comment, "This first revision incorporates use of the term "official correspondence", which is the subject of PI 8, which proposed that new definition. However, PI 8 was rejected despite thorough substantiation. That PI will be pursued during the second draft phase in keeping with this revision".

### 21.3.7

APPA disagrees with this new section as it would require a hatch through the elevator shaft wall or aspirating smoke detection. There are cases where it would be difficult to access depending on the layout of the building. Access to test the initiating device from outside of the hoistway, would require additional when these initiating devices are required. We agree with the negative votes from Technical Committee members Peter A. Larrimer's Negative with Comments, "This is not necessary in the body of the code. At best, this is annex material. This resides under the section in the code that includes impairments/deficiencies and that is not what this section is talking about. A vendor/contractor can make a recommendation any time he wishes, not just during the ITM task as this suggests. What happens when there is actually a deficiency and the contractor/vendor wants to make a recommendation regarding the deficiency or impairment? Does the owner still only have to consider the recommendation? This is unnecessary code language". Jeffrey J. Moore, "This section is unnecessary. Nothing in the Code prohibits presentation of a proposal by ITM personnel to improve or enhance an existing system. Such recommendations are already part of most ITM reports used by service personnel". Michael J. Slattery, "I agree with the comments of both negative votes from the initial ballot". We urge the technical committee to consider these negative votes.

### 10.3

APPA disagrees with the proposed language that adds a risk management assessment for the storage of combustibles without further explanation as to when and who will do the risk management assessment.