Code Amendment Proposal Form
For public amendments proposed to the 2018 editions of the International Codes

Instructions: Upload this form and all accompanying documentation at www.denvergov.org/BuildingCode. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by April 26, 2019.

CONTACT INFORMATION
Name: Larry Rietz, SET Date: April 25, 2019
Phone: 720-499-1597 E-mail: lrietz@jensenhughes.com
Organization: Jensen Hughes, Inc.

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Signature: ____________________________

AMENDMENT PROPOSAL

Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: DBC-IFC
If you submitted a separate coordination change to another code, please indicate which code: ______________

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Code Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBC-xxxx</td>
<td>Denver Building Code–xxxx (code) amendments (e.g., DBC-IBC, DBC-IEBC)</td>
</tr>
<tr>
<td>IBC</td>
<td>International Building Code</td>
</tr>
<tr>
<td>IEBC</td>
<td>International Existing Building Code</td>
</tr>
<tr>
<td>IECC</td>
<td>International Energy Conservation Code</td>
</tr>
</tbody>
</table>

2) Please check here if a separate graphic file is provided: □

Graphics may also be embedded within your proposal below.

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is BOLDING, STRIKETHROUGH AND UNDERLINING. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

Code Sections/Tables/Figures Proposed for Revision:

DBC-IFC 907.5.2

Proposal:

Revise as follows:
907.5.2 Alarm notification appliances. Audible and visible alarm notification shall be provided to alert occupants of the area having a fire alarm system as well as in the means of egress serving the occupancy. The fire alarm control panel shall incorporate an alarm silencing switch that shall only simultaneously de-activate the audible and visible notification appliances until the system is manually reset. Alarms shall be provided in accordance with IFC Sections 907.5.2.1, 907.5.2.2 and 907.5.2.3, as amended, and as required by other sections of this code. Notification appliances shall be listed for the purpose.

Supporting Information:

Purpose:
The purpose of this proposed amendment is to align DBC-IFC 907.5.2 with the model fire code (IFC) published by International Code Council, the National Fire Alarm and Signaling Code (NFPA 72), and Americans with Disabilities Act (ADA) requirements.

Reasons:
Currently, DBC-IFC 907.5.2 requires that visible notification devices remain activated after audible notification devices are de-activated, which results in conflicting signals for people who are deaf or hard of hearing and people who are blind or have limited vision. The proposed change to require that both audible and visible notification appliances be deactivated simultaneously when the silencing switch is used will allow the City and County of Denver to comply with National Codes and Standards and with the intent of the Americans with Disabilities Act (ADA) Standards.

Substantiation:
The proposed change would align with NFPA 72-2016 section 10.12.2 which states that “When an occupant notification alarm signal deactivation means is actuated, both audible and visible notification appliances shall be simultaneously deactivated.” This is critical to meet ADA requirements and to avoid providing conflicting signals for people who are deaf or hard of hearing and people who are blind or have limited vision. This has been the NFPA 72 position since the 2007 edition of that standard. NFPA 72-2016 Annex A section A.10.12 reinforces this position: “It is the intent that both visual and audible appliances are shut off when the notification appliance silence feature is activated on the fire alarm control unit. Per the ADA, it is important not to provide conflicting signals for the hearing or visually impaired.”

2010 ADA Standards section 702 begins with the requirement that “Fire alarm systems shall have permanently installed audible and visible alarms complying with NFPA 72 (1999 or 2002 edition)…”. The ADA Standards reference the two editions of NFPA 72 that were in effect at the time the accessibility standards were being drafted. However, later and current editions of NFPA 72 have incorporated new and updated best practices for the fire alarm industry. By ensuring that audible and visible notification devices are activated or deactivated simultaneously as required by more recent editions of NFPA 72, the City would also become in compliance with the intent of the ADA Standards that, where fire alarm systems provide audible alarm coverage, visible alarms shall also be provided that occupants in the alarm area – including those who are deaf, hard-of-hearing, blind, or with limited vision – can be notified simultaneously of the alarm condition whether it be activation or deactivation.

If City and County of Denver has amended section 907.5.2 because of a desire to deactivate the notification appliances for fire service operations inside the building and signal to evacuated occupants that an alarm is still present, then we suggest adopting the approach recommended in NFPA 72-2016 Annex A section A.10.12.2 which states, “Where it is desired to deactivate the notification appliances for fire service operations inside the building and signal evacuated occupants that an alarm is still present, it is recommended that a separate non-silenceable notification zone be provided on the exterior of the building. The audible and visible notification appliances located at the building entrances could serve as a warning to prevent occupant re-entry.” In this way, fire service operations could continue and evacuated occupants would not re-enter the building. Again, providing simultaneously-operated visible and audible notification devices in this exterior notification zone would comply with NFPA 72 and with the intent of the ADA Standards.

Bibliography:
IFC-2015
Referenced Standards:

No new referenced standards are necessary, as existing referenced Code (NFPA 72) already requires this item.

Impact:

Note: Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

- The effect of the proposal on the cost of construction: □ Increase □ Reduce ☒ No Effect
- The effect of the proposal on the cost of design: □ Increase □ Reduce ☒ No Effect
- Is the proposal more or less restrictive than the I-codes: □ More □ Less ☒ Same

This change would have no impact to the costs of design or new construction and it would bring DBC into compliance with related requirements in the model fire code published by International Code Council, the National Fire Alarm and Signaling Code (NFPA 72), and ADA.

With regards to existing buildings, if the City were to require this proposed change to be in effect retroactively for existing buildings, then a compliance timeframe should be determined, as each building’s fire alarm system would need to be re-programmed and tested to the new standard. This would be the correct thing to do to bring Denver buildings to the same level of compliance as other buildings built and occupied since the application of NFPA 72-2007. Since re-programming and retesting would involve cost to the owner, a grace period of some determined length should be provided. Alternatively, the City may choose to require compliance at existing buildings only if/when an existing fire alarm system is being upgraded, altered, or replaced.

Departmental Impact: (To be filled out by CPD staff)

Note: CITY STAFF ONLY. Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

- The effect of the proposal on the cost of review: □ Increase □ Reduce □ No Effect
- The effect of the proposal on the cost of enforcement/inspection: □ Increase □ Reduce □ No Effect