

In a message dated 9/29/2008 6:54:21 P.M. Eastern Daylight Time, george.smith@fmapprovals.com writes:

Mr. Narva,

This is in reply to your request for our comments re: the above subject. Please review my comments below. I would like to meet with you and your staff to discuss them. Will it be possible to meet and discuss by Wednesday October 1, 2008 prior to release and the effective date of the document? I will try to arrange my schedule to accommodate your availability.

Our comments to the NASFM Bulletin dated September 2008 "*Pallet Fire Loading Impact on Sprinkler Design*" are as follows. They are listed in the order presented in the Bulletin.

Page 1 Section "*Background*" Replace "a UL 2335 listing" with "a listed pallet". NFPA 13 does not reference UL 2335.

Supporting information for our position: *NFPA 13, 5.6.2.7 simply says the pallets have to be evaluated as a fire hazard equivalent to wood, which is exactly what FM Approvals' Standard 4996 does, as stated in its title. In fact, it is interesting that UL 2335 specifically does not state the objective of the testing is to determine equivalency to wood, anywhere in the document.*

Page 2 Replace "Look for the UL Listing" with "look for listed or Approved labeled pallets". Remove UL label facsimiles. Remove "(pending)" after Schoeller Arca Systems Inc. In the table remove "UL 2335 Listed" and replace with "listed or Approved". As an alternative leave as is and add "FM Approval Standard 4996".

Page 3. Answer to question 1 is:

"Yes. The FM 4996 Approval Standard satisfies this requirement."

Supporting information for our position: *The section of NFPA 13-2007 cited above is in fact Section 12.12.2.1(7). This is a sub-section of 12.12.2 'Plastic Pallets', which is a sub-section of 12.12 'Protection of Idle Pallets'. The scope of section 12.12 includes recommendations for both on floor and in rack idle pallet storage. Therefore, the citation of section 12.12.2.1(7) used above is in no way exclusive to in rack storage, as it implies.*

The test protocol used in FM Approval Standard for Classification of Idle Plastic Pallets as Equivalent to Wood Pallets, Class Number 4996 (hereinafter "FM Global 4996") does indeed use a rack storage configuration. A separate test for solid pile (i.e., 'on the floor') storage is unnecessary, as it is well accepted throughout the fire protection community – NFPA, model codes, FM Global protection standards, etc – that rack storage of stable solid commodities presents a higher hazard than solid pile.

Page 3 Answer to question 2 is:

“Yes. The FM 4996 Approval Standard also satisfies these requirements. Both of these test protocols require full scale testing to ensure proper sprinkler protection. Pallets that successfully meet these requirements and qualify with other quality auditing processes can be listed as required by NFPA 13”.

Supporting information for our position: *NFPA 13, 5.6.2.7 simply says the pallets have to be evaluated as a fire hazard equivalent to wood, which is exactly what FM Approvals' Standard 4996 does, as stated in its title. In fact, it is interesting that UL 2335 specifically does not state the objective of the testing is to determine equivalency to wood, anywhere in the document.*

Page 3 Question 4 Delete “It would likely not pass the FM 4996 test either.”

Please let me know when we can meet or discuss these issues, thanks and kind regards!

George

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