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March 31, 2009

Mr. Jim Narva
National Association of State Fire Marshals
1319 F Street, N.W., Suite 301
Washington, DC 20004

Subject: Draft Code Application Bulletin (CAB) "Pallet Fire Loading Impact on Sprinkler Design" and NASFM's Training & Education Program

Dear Mr. Narva:

I appreciate the opportunity to review and comment on the subject draft proposal. We appreciate the role NASFM plays in fire protection in our local communities and states. We feel the training and educational programs that NASFM is preparing will benefit enforcement agencies and concerned businesses. The task ahead is difficult but it is worth the effort to ensure safe work areas for America's businesses. Your leadership in these areas is fully supported.

I would like to point out that the summary chart on page two of the draft CAB is noteworthy because there are several pallet types that have no associated penalties. The options include the use of any of the following pallet construction:

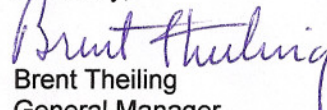
- UL 2335 Listed Plastic
- UL 2335 Listed Construction of any kind
- 100% Wood using Metal Fasteners
- 100% Aluminum / Steel

With the use of these pallets, business owners have options other than upgrading their sprinkler systems or being subjected to a 2-commodity class change. There is abundant information about the UL 2335 listed pallets. The 100% wood pallet has been the standard for many years. I would like to point out that the 100% aluminum pallet is a viable option for warehouse and distribution operations.

I would recommend that NASFM incorporate technical information about aluminum pallets into the upcoming training. This will provide users the information they need to make good business decisions and insure compliance once the code takes effect. As an aluminum pallet manufacturer, LM Containers offers assistance to NASFM in educating companies on the aluminum option.

Thank you for the opportunity to comment and I look forward to future discussions concerning NASFM's training and educational program. Please let me know if you have any questions.

Sincerely,


Brent Theiling
General Manager

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