



NFPA

1 Batterymarch Park, Quincy Massachusetts, USA, 02669

March 10, 2009

Code Application Bulletin
National Association of State Fire Marshals
1319 F Street, NW, Ste 301
Washington, DC 20004

Sent Via E-Mail to cab@firemarshals.org

To Whom It May Concern,

In response to your request for input regarding the Code Application Bulletin "Pallet Fire loading Impact on Sprinkler Design" I would like to provide the following.

Items 1 and 2. The determination of the acceptability of a testing and listing protocol is given to the individual authority having jurisdiction by the definition of "listing" within the standard. The accuracy of CAB response should be discussed with Underwriters Laboratories and Factory Mutual.

Item 3. No Comment

Items 4 and 5. During the past two revision cycles for the 2007 and 2010 editions of NFPA 13 the Technical Committee on Sprinkler System Discharge acted on proposals submitted to revise the requirements for pallets based on the BRFL Report – Fire Tests on Wood Pallets, their actions on the proposals and comments can be found in the Report on Proposals and the Report on Comments for each of the revision cycles. There are no further changes for the 2010 Edition of NFPA 13 relating to these requirements.

Item #6. No Comment

In closing, as we understand it, a NASFM Code Application Bulletin (CAB) is advisory and may not be equally enforced, meaning that the same condition raised in the CAB would exist regarding inconsistent application of the requirements in NFPA 13. Whereas the concerns of NASFM appear to center on the technical requirements of the 2007 edition of NFPA 13, NASFM is encouraged to consider proposing a Tentative Interim Amendment (TIA) to the requirements of NFPA 13, which if issued would modify the requirements of NFPA 13. Should it be the decision of NASFM to pursue a TIA I am available to provide assistance throughout the NFPA process.

Best Regards:

James D. Lake
Senior Fire Protection Specialist
Staff Liaison, Automatic Sprinkler Systems Project

cc: James Narva, NASFM Chief Project Officer
Karen Suhr, NASFM Government Relations

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