



Rick D. Chandler, P.E.
Commissioner

June 13, 2017

Constadino (Gus) Sirakis, PE
Assistant Commissioner of
Technical Affairs and Code
Development
csirakis@buildings.nyc.gov

Mr. Carl Hum
Senior Vice President
The Real Estate Board of New York, Inc. (REBNY)
570 Lexington Avenue
New York, NY 10022

280 Broadway
7th Floor
New York, NY 10007
www.nyc.gov/buildings

Re: Buildings Bulletin 2013-012 (BB 2013-012)

212-393-2043 tel

Dear Mr. Hum:

This is in response to your letter dated June 2, 2017 in which you ask for clarification of the Department's position on Section (IV) of BB 2013-012. Section (IV) states "The Department of Buildings will continue to accept the installation of fire alarm panels, data gathering panels (DGP), terminal transmission boxes (TTB), and all associated fire alarm wiring in exit enclosures in buildings constructed under the 1968 Code or prior codes."

While AC 28-102.4.3 requires existing structures altered after the effective date of the 2008 Code to comply with the provisions of the 2008 Code, the Department understands that requiring a separate 2-hour enclosure for installation of fire alarm system components while disallowing the stairwell enclosure would pose an extreme hardship for those 1968 and prior code buildings. Based on this hardship, our interpretation of the BB 2013-012 is to continue to allow for installation of fire alarm systems and related equipment in stairwell enclosures in only those 1968 and prior code buildings.

Sincerely,

Constadino (Gus) Sirakis, P.E.
Assistant Commissioner, Technical Affairs and Code Development

CS/JAA/DK/DG/dg

C: Gus Sirakis, P.E., Assistant Commissioner
Joseph Ackroyd, P.E., Executive Director & Floodplain Administrator
Dany Karp, RA, Director – Architecture & Engineering
Thomas Pigott, FDNY, Chief of Tech. Mgmt.
Fire Alarm Revision, Steering and Interpretation Committee Members

June 2, 2017

Honorable Constadino (Gus) Siriakis, P.E.
Assistant Commissioner, Technical Affairs and Code Development
NYC Department of Buildings
280 Broadway, 7th Floor
New York, New York, 10007

Dear Assistant Commissioner Sirakis:

In our most recent meetings with the Fire Alarm Committee—comprised of industry representatives including REBNY, and local government agencies such as the NYC Fire Department (FDNY) and the Department of Buildings (DoB)—we have not been able to reach consensus on a recurring issue. The issue is whether risers for Fire Alarm (FA) Panels and any other related fire equipment, Data Gathering Panels (DGPs), and Terminal Transmission Boxes (TTBs) are allowed in stairwell enclosures of existing buildings that comply with 1968 or prior code requirements.

As you know, the 2008 Building Code prohibits the installation of FA systems and related equipment in stairwell enclosures, whereas this was previously allowable under the 1968 and prior building codes. A Department of Buildings (DoB) Bulletin #2013-012 (see attached) clarifies this and certifies that buildings built to 1968 requirements may continue to install FA equipment in stairwell enclosures as an exception to the 2008 Building Code.

However, in the most recent Fire Alarm committee meetings, it appears that FDNY and DoB have reversed policy indicated in the bulletin, requiring all buildings to comply with the 2008 Building Code. This policy reversal is curious given that a one-to-one replacement of an existing FA system in a stairwell enclosure for a building built to 1968 or prior codes is permitted and does not seem to be an issue for either FDNY or DoB.

REBNY is deeply concerned about this reversal because it poses a significant challenge for buildings that do not currently have DGPs or FA systems installed within stairwells built to 1968 or prior codes. These buildings will be particularly challenged in complying with this new policy in order to meet the two-hour survivability requirements. It might even discourage owners from making critical improvements to their building's FA systems, a goal shared among industry, DoB and FDNY.

Please clarify whether DoB has indeed abandoned the premise of Bulletin #2013-012. Unless there are clear safety implications guiding this policy, REBNY asks that DoB reconsider its position due to the practical considerations outlined above. Please let us know if a follow-up meeting is necessary. Thank you for your consideration.

Best,

Carl Hum
Senior Vice President
Management Services and Government Affairs



NYC Buildings Department
280 Broadway, New York, NY 10007

Robert D. LiMandri, Commissioner



BUILDINGS BULLETIN 2013-012

Technical

Supersedes: None

Issuer: James P. Colgate, RA, Esq. *James P. Colgate*
Assistant Commissioner for Technical Affairs and Code Development

Issuance Date: September 13, 2013

Purpose: This document clarifies 2008 Code and 1968 Code requirements with regard to fire alarm equipment and panels, data gathering panels, terminal transmission boxes and all associated wiring in stair enclosures

Related Code/Zoning Section(s): BC 1019.1.2

Subject(s): Stair enclosure, penetrations; Fire alarm equipment, fire alarm panel, data gathering panels (DGP); Stair enclosure, data gathering panels (DGP); Stair enclosure, terminal transmission boxes (TTB); Stair enclosure, fire alarm wiring

I. Effective date

This bulletin shall take effect immediately.

II. Background

Section 1019.1.2 of the 2008 NYC Building Code (BC) prohibits various types of penetrations in exit stair enclosures and states:

"Penetrations into and openings through an exit enclosure are prohibited except for required exit doors, equipment and ductwork necessary for independent pressurization, sprinkler piping, standpipes, electrical raceway for Fire Department communication and electrical raceway serving the exit enclosure and terminating at a steel box not exceeding 16 square inches. Such penetrations shall be protected in accordance with Section 712. There shall be no penetrations or communication openings, whether protected or not, between adjacent exit enclosures."

III. New Buildings and Alterations to 2008 Code Buildings

Where a new building or alteration is subject to Section BC 1019.1.2, the fire alarm panel, data gathering panels (DGP), terminal transmission boxes (TTB), and all associated fire alarm wiring shall not be installed in stair enclosures.

IV. 1968 Code or Prior Code Buildings

The Department of Buildings will continue to accept the installation of fire alarm panels, data gathering panels (DGP), terminal transmission boxes (TTB), and all associated fire alarm wiring in exit enclosures in buildings constructed under the 1968 Code or prior codes.