

TO: Senator Robert Wirch, Chair
And Committee Members
Senate Committee on Economic Development, Housing & Government Operations

FR: Dan Gengler, National Fire Sprinkler Association-Wisconsin Chapter (414-482-7305)
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Jack Neuhauser, Road Sprinkler Fitters, Local 669 (608-429-4808)

DA: January 18, 2000

RE: Department of Commerce Rules – Clearinghouse Rule 99-086

On behalf of the National Fire Sprinkler Association – Wisconsin Chapter, Road Sprinkler Fitters Local 669, and Sprinkler Fitters Local 183, it is critical that we offer input regarding the Department of Commerce proposed rules (Clearinghouse Rule 99-086) currently before the Senate Committee on Economic Development, Housing, and Government. Our concerns specifically relate to the installation of multi-purpose systems. We would be remiss if we did not provide you with information regarding our concerns as the integrity of our industry – our profession – rests solely on our ability to ensure life safety in the event of a fire.

On the outset, please know that we commend the Department of Commerce (DOC) in their willingness to listen to our concerns about the rule, and for making modifications to the rule based on those concerns. It is our belief that the rule, as currently drafted, is far superior to the original rule draft for a number of reasons:

1. Whereas the original rule draft excluded any training requirements for the installation of multi-purpose systems, the current rule draft requires the installer to pass a DOC approved education/training course.
2. The original rule included exceptions to National Fire Protection Association (NFPA) minimum standards concerning the type of piping that could be used for multi-purpose systems, resulting in substandard systems. The current rule draft requires that listed piping is both in accordance with NFPA 13D and the plumbing code.
3. The original rule termed the equipment discussed, “combined plumbing/sprinkler systems.” Because of fire sprinkler industry concern about the effectiveness of the equipment, the current rule draft refers to the equipment instead as a “multi-purpose system.”

We understand DOC's effort to gain some regulatory control over these multi-purpose systems, and we can concede that some guidelines and regulation are better than none at all. As an industry and as fire safety advocates, it is imperative that we are on record at this time in opposition to the multi-purpose system overall, as well as the promotion of such equipment over stand-alone fire sprinkler systems, as it is our firm belief that these rules fall short of minimum fire safety standards.

The fire sprinkler industry has dedicated its entire professional existence to life and fire safety. There simply is not conclusive evidence that the multi-purpose systems are adequately effective in the event of a fire. We believe that a multi-purpose system is significantly inferior to a stand-alone fire sprinkler system in its ability to save lives. The facts and rationale to support this are as follows:

- In over 100 years of existence, there has never been a multiple life loss in a properly designed fire sprinklered building.
- A stand-alone fire sprinkler system does not have to compete for water with a shower, washing machine, lawn sprinkler, or toilet when an unwanted fire starts (whereas a multipurpose system does). A stand-alone system is designed specifically for fire suppression only.

Although the National Fire Protection Association (NFPA) has adopted minimum model standards for the installation of multi-purpose systems, those standards recommend a complete system installation. A complete system is one that ensures fire protection in all areas of a home in the event of a fire by providing complete sprinkler coverage throughout the entire home. Unfortunately, the Department of Commerce rule allows for "partial systems" which do not provide complete sprinkler coverage, and thus, give a false sense of security to the homeowner. Because of this exemption from the NFPA model standards, NFPA has submitted testimony to DOC stating the rule provides "substandard" provisions to their minimum model standard. The allowance for partial systems is one provision the fire sprinkler industry simply cannot support.

In addition, it concerns the fire sprinkler industry that these standards are placed specifically in the plumbing code. If this system is supposed to serve the purpose of fire protection, it is illogical that fire sprinkler professionals, whose careers are dedicated to fire safety, would be prohibited from such work. Although at this time, these systems are not something the fire sprinkler industry is comfortable promoting, there may be a time when technological improvements could vastly improve these systems and make them an effective option for the fire sprinkler industry.

As you can see, this rule places members of the fire sprinkler industry in a compromising situation. It is a situation in which plumbing equipment is venturing into the arena of fire protection. It is a situation in which individuals with minimal fire safety training – life safety

and property protection – are installing this equipment. It is a situation in which DOC deems some fire protection (whether a partial system, a substandard system, installed by an individual with minimal training) better than no protection at all.

The Department has stated that multi-purpose systems are in the marketplace, and DOC needs to ensure the systems are being installed appropriately. These rules provide some guidance to provide for proper installation of this equipment. While we do not support these rules outright, due to our genuine concerns about the effectiveness of multi-purpose systems, we can understand the Department's position.

Please know that the fire sprinkler industry is dedicated to and will continue the promotion of fire sprinkler systems that provide complete and optimal fire safety protection to Wisconsin citizens. We will continue to promote and provide installation of these systems by individuals with comprehensive education and training in the installation of fire safety equipment. Further, we will continue to work with DOC in efforts to make complete, effective systems and their installation accessible and affordable to Wisconsin's residential homeowners.

We have appreciated working in cooperation with the Department of Commerce, and we believe we have exhausted our opportunity for input on this issue. In so doing, although some of our concerns remain, the rule in its current form is much improved since its inception. Should you wish to have further information regarding our concerns, we would be pleased to share information with you. Thank you for the opportunity to express our opinions concerning this rule.

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