



## National Fire Protection Association

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### MEMORANDUM

**TO:** NFPA Technical Committee on Electronic Computer Systems  
**FROM:** Joanne Goyette  
**DATE:** May 19, 2011  
**SUBJECT:** NFPA 75 ROC **TC FINAL** Ballot Results (F2011)

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The Final Results of the NFPA 75 ROC Letter Ballot are as follows:

**28 Members Eligible to Vote**  
**3 Not Returned** (T. Goonan, G. Petrou, and H. Roux)  
**22 Affirmative on All**  
**3 Negatives** (A. Brown, S. McCluer, and R. Willard) (on one or more comments as noted in the attached report)  
**0 Abstentions**

There are two criteria necessary to pass ballot [(1) affirmative  $\frac{2}{3}$  vote and (2) simple majority].

- (1) The number of affirmative votes needed for the comment to pass is **17**.  
(28 eligible to vote - 3 not returned - 0 abstentions =  $25 \times 0.66 = 16.5$ )
- (2) In all cases, an affirmative vote of at least a simple majority of the total membership eligible to vote is required. This is the calculation for simple majority:  
[28 eligible  $\div 2 = 14 + 1 =$  **(15)**]

Reasons for negative votes, etc. from alternate members are not included unless the ballot from the principal member was not received.

According to the final ballot results, all ballot items received the necessary  $\frac{2}{3}$  required affirmative votes to pass ballot.

**75-3 1.3.1 (Log # 6)**

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**Negative**

**Brown, A.** As a risk engineer who regularly performs risk analysis to determine if risk mitigation is required to achieve a desired level of safety or property protection, I would disagree with the Committee's approach towards risk based application of the Standard. The Committee's approach is based on the assumption that that the application of the standard as a whole, always results in a safe or adequately protected facility and does not result in the installation of unnecessary or excessive levels of protection. To allow the user of the standard to decide not to implement a portion of the standard, when they have good reason to do so simply recognizes the fact that the committee cannot foresee all circumstances under which the standard will be applied and allows flexibility of users, and AHJ's, not to apply portions of the standard when a documented risk analysis demonstrates that the application of the portion of the standard brings no benefit or that the cost of implementing the portion of the standard outweighs the benefits. This approach has been applied successfully in Europe to Health & Safety since 1989 and does not devalue the codes and standards that we employ. I would ask the committee to reconsider their approach to Risk Assessment and to allow partial application of the standard and not require 100% compliance.

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**75-8 3.3.x.3 Information Technology Equipment (ITE) (New) (Log # 9)**

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**Negative**

**McCluer, S.** The committee action should have been to accept in principle. We note that the comment applies to ROP #75-8, not to #75-9 as shown on the report. The submitter's comment did not introduce new definitions, as the "communications equipment" definition had already been accepted in ROP # 75-11 and the "communications circuit" had already been accepted in ROP #75-15. Both properly reference the source of the definition as NFPA 70. The modification to the definition for "information technology equipment" is editorial in nature; it deletes the improperly noted citations to the NEC per the NEC style manual. Because the NEC definition cites two clauses within itself, the definition cannot be used verbatim in NFPA 75. If the committee wishes to cite the source of the definition as coming from NEC, then it should follow the recommendation in submitter's substantiation, with the clarification that the definition appears in NEC 645.2.

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**75-12 3.4 Aisle Containment Definitions (Log # 27)**

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**Affirmative with Comment**

**McCluer, S.** We understand the final paragraph to refer to A.3.4.6, not to A.3.3.10 as shown, and it is meant to be deleted.

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**75-18 5.7 (New) (Log # 28)**

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**Affirmative with Comment**

**McCluer, S.** Clause 5.7.9 is redundant and should have been deleted

- The requirement for a suppression system to be designed to develop the required concentration for the entire volume served is already addressed in 8.4.2.

- Requiring a system to be designed after it already exists is a nonsequitur.

5.7.10 is worded clumsily and contains two provisions. It should have been worded something as follows:

5.7.9 When an aisle containment system or a hot air collar is installed into a space with an existing gaseous suppression system, one of the following shall apply:

(1) The aisle containment system or hot air collar permits the existing gaseous suppression system to produce the required concentration throughout the volume served; or

(2) the gaseous suppression system is modified to ensure that it can produce the required concentration within the contained area .

A.5.7.6 - The rewording did not add clarity. Temperatures in a hot aisle can exceed 100F for short, prolonged, or continuous time periods during normal facility operations. We have observed hot aisle temperatures as high as 125F under normal operating conditions.

A.5.7.8.1 the final sentence should read "...timed response and effective performance..."

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**75-21 8.1.1.2** (Log # 13)

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**Affirmative with Comment**

**Langer, R.** I believe the committee action should refer to 75-25, (Log #CC4) not 75-30, (Log #4).

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**75-25 8.1.1.2** (Log # CC4)

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**Negative**

**Willard, R.** The text of 8.1.1.2 (2) results in a near universal requirement to provide underfloor suppression, even in spaces having only minute quantities of combustible materials that would normally be exempted by standards such as NFPA 13. This requirement for suppression in underfloor spaces has never been justified by any data such as loss history or fire location analysis. The absolute requirement for underfloor suppression can result in an undue and unjustified burden.

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**75-27 8.1.3** (Log # CC5)

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**Negative**

**Willard, R.** The 2009 verbiage of section 8.1.3 "valved separately from" is not clear and can be open to multiple interpretations. The committee action and particularly the substantiation will now permit the sprinkler system serving the Information Technology Equipment areas to be arranged as sub-systems to larger systems serving other areas. Thus, whenever an outage is required to accommodate work in these other areas, an outage of the IT area sprinkler system will also occur. Such an arrangement reduces the level of protection within the IT area.

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**75-30 8.2.2** (Log # 4)

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**Negative**

**McCluer, S.** The committee action should have been to accept in principle. The submitter's comment was on proposal #75-49 and clause 8.2.2, both of which address the use of automatic smoke detectors with interlocks and shutdown devices. Submitter asks to create an Annex A.8.2.2. The committee's action on the original proposal 75-49, while vague, was to refer to its actions on proposals #75-32 and 75-29. Both require interlock and automatic damper operation. Clause 8.2.2. of the existing standard addresses shutdown devices. Annex A.8.2.1 (previous clause) raises concerns about sensor sensitivity. Cross zoning to prevent false alarms is an established practice which, while not mandatory, deserves to be recognized as a good idea in Annex A.8.2.2.