

Report of the Committee on

**Fire and Emergency Service Organization and Deployment
— Volunteer**

Peter A. McMahon, *Chair*
Town of Grand Island, NY [C]

Alden H. (Andy) Andersen, Deer Park, MD [C]
Robert T. Bettenhausen, Village of Tinley Park, IL [E]
Rep. International Association of Fire Chiefs
Douglas E. Chappell, Village of Hazel Crest, IL [U]
Rep. Nat'l Volunteer Fire Council
Alan Corner, Alan Corner, Esq., WA [E]
Rep. International Association of Fire Chiefs
Larry W. Curl, Wayne Township Fire Dept., IN [E]
Rep. International Association of Fire Chiefs
Ronald R. Farr, Kalamazoo Township Fire Department, MI [L]
Rep. National Association of Town and Township
James L. Gordon, City of Pierre Fire Department, SD [U]
Rep. National Volunteer Fire Council
James G. Hannigan, New York State Association of Fire Chiefs,
NY [E]
Rep. New York State Association of Fire Chiefs
Maureen Hennessy, Prince George's County Fire/EMS Dept., MD
[L]
Rep. NFPA Fire Service Section
Richard C. Maddox, Creedmoor Psychiatric Center, NY [U]
Rep. Fire Department Safety Officers Association
John J. McAuliffe, Wethersfield, CT [U]
Rep. National Volunteer Fire Council
Kenneth H. McMahon, MOTIVA LLC., DE [L]
Rep. Delaware Volunteer Firemen's Association
Dale Moon, City of Williams Lake Fire Department, Canada [E]
Vernon J. Patton, First Energy Corporation, OH [C]
Timothy N. Pelton, Do It Better.com, Inc., CT [L]
Richard Trexler, Colfax Volunteer Fire Department, NC [I]
Rep. Volunteer Firemen's Insurance Services, Inc.

Alternates

Stephan D. Cox, National Volunteer Fire Council, MD [U]
(Alt. to D. E. Chappell)
Jay Howell, Pikeville Insurance Agency, Inc., NC [I]
(Alt. to R. Trexler)

Robert J. Kilpeck, Brandon Fire Department, VT [U]
(Alt. to J. L. Gordon)

Jeremiah O'Sullivan, Association of Fire Districts – New York
State, NY [E]
(Alt. to J. G. Hannigan)

Staff Liaison: **Stephen N. Foley**

Committee Scope: This Committee shall have primary responsibility for documents on the organization, operation, deployment, and evaluation of substantially all volunteer public fire protection and emergency medical services.

This list represents the membership at the time the Committee was balloted on the text of this edition. Since that time, changes in the membership may have occurred. A key to classifications is found at the front of this book.

This portion of the Technical Committee Report of the Committee on **Fire and Emergency Service Organization and Deployment — Volunteer** is presented for adoption.

This Report on Comments was prepared by the **Technical Committee on Fire and Emergency Service Organization and Deployment — Volunteer**, and documents its action on the comments received on its Report on Proposals on NFPA 1720, **Standard for the Organization and Deployment of Fire Suppression, Emergency Medical Operations and Special Operations to the Public by Volunteer Fire Departments**, as published in the Report on Proposals for the 2001 May Meeting.

This Report on Comments has been submitted to letter ballot of the **Technical Committee on Fire and Emergency Service Organization and Deployment — Volunteer**, which consists of 17 voting members; of whom 16 voted affirmatively, and 1 ballot was not returned (Corner).

Mr. Curl voted affirmatively with the following comment:
I support the 1720 document content but would like the records to show that I still oppose the two document process.

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

(Log #3)
1720- 1 - (Entire Document): Reject
SUBMITTER: Pete Holtman, Pierce County Fire District 8
COMMENT ON PROPOSAL NO: 1720-59
RECOMMENDATION: Delete 1710 in its entirety as it is not in the best interests of the local fire departments.
SUBSTANTIATION: None.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

Delete all of Chapter 5 in regard to staffing minimum four personnel engine crews, companies and to staffing five or six personnel engine (no 5 or 6 person companies)
Delete all of Chapter 5 NFPA 1710 regard to deployment and staffing.
SUBSTANTIATION: We consider it outrageous to this unfair process which is an attempt to circumvent local control of personnel and staffing issues. We are not metro fire departments. We man within our resources and not for large cities. Brush trucks included.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #4)
1720- 2 - (Entire Document): Reject
SUBMITTER: Verne Pierson, Graham Fire & Rescue
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: 1. Delete 1710 in its entirety. Most western rural departments not able to comply.
2. Delete 1710 Chapter 5.2.3.1.1 four minute requirement. Not possible in rural environments.
3. Delete minimum four person staffing and five - six tactical staffing. Not financially feasible.
4. Delete all Chapter 5 (NFPA 1710) deployment and staffing - Not financially responsible nor realistic for non-metro rural fire departments.
SUBSTANTIATION: As an elected official in a primarily rural fire district, I find many of the requirements of NFPA 1710 beyond the abilities of a fire department to meet. With state restrictions on taxing ability, the standards with above items included would be absolutely impossible to meet.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #8)
1720- 6 - (Entire Document): Reject
SUBMITTER: Larry Ericksen, Chelan County Fire District #4
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: ~~1710~~—1720
SUBSTANTIATION: These standards would be almost impossible to fulfill as to budget restrictions and availability of manpower.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The Technical Committee, through its deliberations has recognized that the development of a standard would provide a basic template from which "substantially" volunteer fire departments could work. This standard provides that template in such a manner that fire departments, working in conjunction with their "authority having jurisdiction" (AHJ), and as part of a municipalities overall management plan can provide a level of service to the citizens by the fire department. Nothing in this standard prohibits either the fire department or the AHJ from developing an implementation plan to meet this standard.

(Log #5)
1720- 3 - (Entire Document): Reject
SUBMITTER: Bill Knannlein, Grays Harbor Fire Commission Assn.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete 1710.
Delete four minute response time.
Delete all Chapter 5 staffing.
Delete minimum four person engine company.
SUBSTANTIATION: Volunteer fire departments cannot meet four man pumper companies or four minute response time. We have no one in stations. We are unable to pay for station personnel. They respond from all distances.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #14)
1720- 7 - (Entire Document): Reject
SUBMITTER: Richard Kistler, Thurston County Fire Protection District # 7
COMMENT ON PROPOSAL NO: 1710-259
RECOMMENDATION: Delete "volunteer".
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee rejected the submitter's comment as it is outside the scope of this standard.

(Log #6)
1720- 4 - (Entire Document): Reject
SUBMITTER: Jack R. Dillon, Yakima Fire District #9
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Need to delete 1710. It's not good for fire departments.
Need to delete Chapter 5. It is not financially feasible. We are a small fire district . There is not enough money in our budget now.
SUBSTANTIATION: We are all volunteer, including commissioner. We strive to keep up. 1710-1720 is not reasonable.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #20)
1720- 8 - (Entire Document): Reject
SUBMITTER: Richard Gleckler, Thurston County Fire Protection District #7
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "volunteer".
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee rejected the submitter's comment as it is outside the scope of this standard.

(Log #7)
1720- 5 - (Entire Document): Reject
SUBMITTER: Donald E. Foster, Spokane County Fire District #9
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete 1710 in its entirety, not best interests of local fire departments.
Delete four minute response time requirements in 1710. Delete chapter 5.2.3.1.1.

(Log #22)
1720- 9 - (Entire Document): Reject
SUBMITTER: Mike Berman, Thurston County Fire Protection District #7
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "volunteer".
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee rejected the submitter's comment as it is outside the scope of this standard.

(Log #24)

1720- 10 - (Entire Document): Reject
SUBMITTER: Raymond L. Harry, Thurston County Fire Protection District # 7
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "volunteer".
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee rejected the submitter's comment as it is outside the scope of the standard.

(Log #26)

1720- 11 - (Entire Document): Reject
SUBMITTER: Jerry Davis, Selah Fire Department YCFD #2
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete 1710 in its entirety not at best of local fire departments.
Delete 4 minutes response time 1710 5.2.3.1.1.
Delete all of Chapter 5 minimum staffing not feasible for non-metro departments.
SUBSTANTIATION: NFPA 1500 was tough on us. 1710 and 1720 will close small city and rural departments. The America will really be burning. Please use common sense.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #27)

1720- 12 - (Entire Document): Reject
SUBMITTER: Patrick J. Kennedy, Spokane County Fire District 9
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Following are major objections to the standards as they are currently written.
1. Delete 1710 in its entirety as it is not in the best interests of the local fire departments.
2. Delete the four-minute response time requirement in 1710 (delete Chapter 5.2.3.1.1).
3. Delete all of Chapter 5 in regard to staffing of minimum four-person engine companies and to tactical hazards where there will be a requirement of five or six persons per engine (Chapter 5.2.2.1.1).
4. Delete all of Chapter 5 (NFPA 1710) in regard to deployment and staffing. It is neither financially feasible nor realistic for non-metro fire departments and districts.
SUBSTANTIATION: Proposed deployment standards in NFPA 1710-1720 cannot in any way be funded by non-metro fire departments!
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #29)

1720- 13 - (Entire Document): Reject
SUBMITTER: Thomas M. Shaughnessy, Camano Island, WA
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: 1) Delete 1710 entirely - it is not in the best interest of the fire district (rural).
2) Delete 4 minute response time (1710 Chapter 5.2.3.1.1) not possible for our district.
3) Delete all of Chapter 5 regard to staffing minimum of 4-person engine co. to "tactical hazards" requirements of 5 or 6 person engine co. (Chapter 5.2.2.1.1).
4) Again "Delete" All of Chapter 5 (1710) regard, "Deployment and Staffing", not financially realistic for our Rural District.
SUBSTANTIATION: I'm a fourteen Fire Comm. - we have a limited budget - virtually "All Volunteer Department" - "Rural Area" our tax base simply could not and would not agree to finance such an extravagant proposal!
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #30)

1720- 14 - (Entire Document): Reject
SUBMITTER: Floyd E. Davis, Grays Harbor Fire District # 4
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete all of proposal 1710 - our department could not comply.
Delete Chapter 5.2.3.1.1.
Delete Chapter 5.2.2.1.1.
Delete all of Chapter 5 in NFPA 1710.
SUBSTANTIATION: A 4 minute response time is totally unrealistic for our department, especially during the night. During the day, we are lucky to have six responders, total! If these requirements are approved, our department would have to disband. No one wants that to happen.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #31)

1720- 15 - (Entire Document): Reject
SUBMITTER: John C. Gordon, Chelan County Fire District # 7
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete 1710 in its entirety as it is not in the best interests of the local fire departments.
SUBSTANTIATION: Most rural fire districts in the western part of the United States do not have the funding or tax base to realistically fund these NFPA proposals. I urge you to stop and think about the financial burdens you are putting on rural taxpayers when you draft these proposals!
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #44)

1720- 16 - (Entire Document): Reject
SUBMITTER: Pete Holtman, Pierce County Fire District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete all of Chapter 5 (NFPA 1710) in regard to deployment and staffing. It is neither financially feasible nor realistic for non-metro fire departments and districts.
SUBSTANTIATION: None.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #45)

1720- 17 - (Entire Document): Reject
SUBMITTER: Thomas M. Shaughnessy, Camano Island, WA
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: 1) Delete 1710 entirely - it is not in the best interest of the fire district (Rural).
2) Delete 4 minute response time (1710 Chapter 5.2.3.1.1) not possible for our district.
3) Delete all of Chapter 5 regard to staffing minimum of 4-person engine co. to "tactical hazards" requirements of 5-6 person engine co. (Chapter 5.2.2.1.1).
4) Again "Delete" All of Chapter 5 (1710) regard, "Deployment and Staffing" not financially realistic for our Rural District.
SUBSTANTIATION: I'm a 14 year Fire Comm. - we have a limited budget - virtually "All" Volunteer Dept. - "Rural Area" our tax base simply could not and would not agree to finance such an extravagant proposal!
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #46)

1720- 18 - (Entire Document): Reject
SUBMITTER: Wayne Kier, Sr., Jefferson County Fire Protection Dist. #3
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete 1710 in its entirety.

SUBSTANTIATION: I object to this standard in its entirety, because it deprives taxpayers and local jurisdictions to determine their own level of service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #68)

1720- 19 - (Entire Document): Reject
SUBMITTER: Richard Small, Thurston County Fire Protection District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "volunteer".
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee rejected the submitter's comment as it is outside the scope of this standard.

(Log #51)

1720- 20 - (Entire Document): Reject
SUBMITTER: Ken Parsons, Thurston County Fire Protection District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "volunteer".
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee rejected the submitter's comment as it is outside the scope of this standard.

(Log #53)

1720- 21 - (Entire Document): Reject
SUBMITTER: Arthur Getchman, Thurston County Fire Protection District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "volunteer".
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee rejected the submitter's comment as it is outside the scope of this standard.

(Log #55)

1720- 22 - (Entire Document): Reject
SUBMITTER: Brian K. VanCamp, Thurston County Fire Protection District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "volunteer".
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee rejected the submitter's comment as it is outside the scope of this standard.

(Log #58)

1720- 23 - (Entire Document): Reject
SUBMITTER: Walter Schoonmaker, Hartsdale Fire Dist.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete entire proposal.
SUBSTANTIATION: Many departments will not be able to comply and the standard will be used against fire departments and officers in legal action.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #64)

1720- 24 - (Entire Document): Reject
SUBMITTER: Dwight James, Rochester, WA
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete entire 1710 proposal and rewrite to recognize the differences between the capabilities of the small rural volunteer organizations, and the fully paid departments.
SUBSTANTIATION: Small rural volunteer departments must be given a different standard, or level of response capabilities, from municipal or fully paid departments. Our areas of coverage, in many cases, makes this standard unreachable for us, and to set a standard above the capability of a vast number of districts is unacceptable.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Action taken on Comment 1720-2 (Log #4).

(Log #70)

1720- 25 - (Entire Document): Reject
SUBMITTER: Richard J. Nosal, Eagle Point Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-257
RECOMMENDATION: Agree with Proposal 1720-257. Reject entire document.
SUBSTANTIATION: None.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #72)

1720- 26 - (Entire Document): Reject
SUBMITTER: Robert J. Kolva, Spokane Company FPD 13
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: These requirements are unrealistic and cannot be met by rural volunteer fire departments. Even with all of our volunteers responding with our equipment we could not fight fire within 2 minutes.
SUBSTANTIATION: None.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #73)

1720- 27 - (Entire Document): Reject
SUBMITTER: Ed Lowe, Lewis County Fire Protection District #14
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: The whole thing should be deleted!
SUBSTANTIATION: I am a member of a rural volunteer fire department and I do not feel this proposed standard is in the best interest of the people we serve. This proposed standard would put an unbearable load on many rural fire departments and could cause many of them to fold leaving their taxpayers without their valuable services.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #74)

1720- 28 - (Entire Document): Reject
SUBMITTER: Aranda Justici, Lewis County Fire District #14
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: 1720 should be deleted completely.
SUBSTANTIATION: 1720 is really not in the best interests of our rural fire districts. It is neither logistically or economically feasible for rural fire districts to provide minimum response times and manning required by 1720. The people living in these rural areas chose to reside here and are accepting these facts. 1720 could force a heavy burden on them, either by the loss of providing the proposed response times and responding. Volunteers or the possible loss of their fire district altogether due to financial ruin of rural district.

These additional requirements added to others and decreasing revenue could add to the demise of rural districts.

If people want these response times and manning requirements, they have the power to lobby the fire districts, approve levies that would provide funding for these services. 1720 would take this freedom away from the people.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #75)

1720- 29 - (Entire Document): Reject

SUBMITTER: Linda Lowe, Randle, WA

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete 1720 entirely.

SUBSTANTIATION: 1720 would not be a good idea for local rural fire districts. A 4 minute response time and manning levels would be impossible for volunteer firefighters. The people living in these small fire districts could not afford to pay for manning their fire stations.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #77)

1720- 30 - (Entire Document): Reject

SUBMITTER: Calvin Augur, Lewis County Fire Protection District #14

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete entire NFPA No. 1720.

SUBSTANTIATION: NFPA No. 1720 cannot be followed logically by rural volunteer fire departments.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #78)

1720- 31 - (Entire Document): Reject

SUBMITTER: Joni Mullins, Lewis County Fire Protection District #4

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete 1720 completely.

SUBSTANTIATION: Being from a rural volunteer department without financial means to be able to hire full-time firefighters that would be required by 1720 (to provide the minimum response times and manning of the station).

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #79)

1720- 32 - (Entire Document): Reject

SUBMITTER: Jeffrey J. Jaques, Lewis County Fire Protection District #14

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete 1720 in its entirety. 1720 is not in the best interest of the citizens of local rural volunteer fire departments. It is not financially nor logistically feasible for the taxpayers of these sparsely populated districts to provide the response times nor manning levels specified in 1720. The citizens living in these rural districts choose this way of life and accept these facts. Forcing these requirements on them could place a tremendous burden on them either by the costs of increased service requirements or by the total elimination of their fire protection altogether due to the financial collapse of the rural fire departments.

SUBSTANTIATION: Deletion of 1720 in it's entirety will leave the minimum manning and response times up to the commissioner of the rural fire districts. The commissioners were elected by the citizens to provide the best level of fire protection that is feasible for each unique fire district. The rural district's such as ours with \$80 K budget, population of 3500 and 105 square miles of district cannot provide the same levels of service

that larger districts with million dollar budgets can but we provide the best service we can within our financial situation.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #82)

1720- 33 - (Entire Document): Reject

SUBMITTER: Darren Player, Rep. Lancaster County Fire Chiefs Assoc

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: We believe NFPA 1710 and 1720 should be deleted in its entirety.

SUBSTANTIATION: I represent 19 volunteer and 1 paid fire departments. We believe NFPA is trying to involve itself in fireground decisions better handled by local people familiar with their particular situations. These two standards will divide the fire service needlessly and cause unmeasurable hardship on the small communities across the U.S.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #89)

1720- 34 - (Entire Document): Reject

SUBMITTER: Roy A. Rodriguez, Barstow Fire District

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: I ask that you not approve any new changes or create new codes that fire departments cannot pay for. Unless you have already established a funding source that is available to all fire departments that may be affected by your decisions.

SUBSTANTIATION: In response to the proposed changes to NFPA 1710 and 1720, I must ask that you seriously consider all the implications of the changes you are proposing. To any fire department the number one issue will always be the financial costs of implementing any new programs or changes necessary to meet new requirements.

These changes are considered unfunded mandates. Creating new rules or standards that will affect a fire department's ability to fulfill those changes without giving them the funding to implement, is an unfunded mandate.

I hope that you will consider the comments I have expressed to your Council.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #90)

1720- 35 - (Entire Document): Reject

SUBMITTER: Bob Close, Mason County Fire District #6

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: We urge you to reconsider your position and reject these standards as they are written.

SUBSTANTIATION: As the governing Board of Commissioners of a Combination Fire Department in Union, Washington, we would like to take this opportunity to express our dismay and disapproval of the proposed standards NFPA 1710 and NFPA 1720.

We have the utmost respect for the long history of the NFPA and its efforts to ensure the safety of all Fire Service personnel. However, after careful review of these two proposed standards, we are convinced that the committee has somehow strayed from that honorable past and entered into an area which it is neither qualified nor empowered to dictate standards.

The dictate of service levels has always been borne by, and should remain in the hands of the "Authority having Jurisdiction" and the community which it serves. While we are sure that the committee intends only the best for our constituents, it is impossible for the committee to know or understand the demographics of our community. Surely you can all understand the need to establish service levels based on those many factors.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #91)

1720- 36 - (Entire Document): Reject
SUBMITTER: Larry Plumer, Wisconsin State Firefighter's Association, Inc.

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Our Board of Directors has not met for awhile and realizes this is not the appropriate method to handle this situation, but in roughly going over NFPA 1710 and NFPA 1720, we feel many of these changes should be left at the local level.

SUBSTANTIATION: The Wisconsin State Firefighters Association, serving approximately 11,000 volunteer firefighters throughout the State of Wisconsin is more than willing to work with your committee in these areas because we are made up basically of volunteer firefighters of which these changes will affect.

Thank you for any consideration you may give us in this area.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #92)

1720- 37 - (Entire Document): Reject

SUBMITTER: Walter Schoonmaker, Hartsdale Fire Dist.

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Oppose in its entirety.

SUBSTANTIATION: As an NFPA member and Fire Chief of the Hartsdale Fire District, I adamantly oppose the proposed standards 1710 and 1720 for the following reasons:

1. As far as I can see, 1710 is just another ploy by the IAFF to force minimum manpower requirements through recognized standards. This was the reason for the defeat of 1500 and the abolishment of the 1200 committee. For the NFPA to establish standards which will be forced upon communities through legal action is just plain wrong. Let the IAFF negotiate manpower, unless the NFPA is considering funding the additional manpower they are advocating.

2. We are not aware of scientifically documented data which would suggest a direct relationship between staffing and fire fighter safety. We strongly oppose the inclusion of any staffing minimums in NFPA 1710 or any other national standard or regulation. The way I see it, the more people involved the greater the chance of more injuries. Let the authority having jurisdiction make the manpower decision.

3. 1720 looks like a plan to get rid of volunteer fire fighters, not immediately but as a long range plan.

4. The vast majority of what is included in 1710 and 1720 is like a reinvention of the wheel, it's in place and in use and can be found in many writings throughout the fire service, so there is no legitimate reason for these standards.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #99)

1720- 38 - (Entire Document): Reject

SUBMITTER: Ron Malaspino, North Highline Fire Dept.

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: We are opposed to dual standards for paid and volunteer fire service.

SUBSTANTIATION: Paid or volunteer, firefighters must do the same job. We do not want two standards.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #100)

1720- 39 - (Entire Document): Reject

SUBMITTER: Mike Rusch, Adams County Fire District

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete 1720 - revised document to serve as a general guideline.

SUBSTANTIATION: The standards set by 1720 are not attainable to smaller volunteer fire departments operating with limited resources.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: The Technical Committee has discussed this option since it first met, and again at the Report on Proposal (ROP) stage of review. The Technical Committee feels that the "minimum" requirements of this standard are not prohibitive, and should be a standard within the NFPA's Standards Making Process. The Technical Committee has provided for a phase-in implementation plan that allows both the fire department, working with the authority having jurisdiction to develop a plan to meet the minimum requirements of this standard.

(Log #101)

1720- 40 - (Entire Document): Reject

SUBMITTER: Bruce Carman, Island County Fire District No. 2

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete NFPA 1720 in its entirety.

SUBSTANTIATION: Rural fire districts cannot financially or logistically comply with these unrealistic proposed standards. It is in the best interests of the taxpayer that these deployment decisions be left to local elected officials who are responsible for the operations of the fire department. These decisions are local policy issues which should not be mandated by special interest groups.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #108)

1720- 41 - (Entire Document): Reject

SUBMITTER: David Lynam, Clark County Fire Marshal

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete the standard in its entirety.

SUBSTANTIATION: The proposed standard does not recognize the dependent connection of a community's building and fire codes, its fire prevention programs and its emergency response resources in defining acceptable levels of fire protection. The relative levels of each of these and other protection components should be decided locally based upon available conditions and resources.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #109)

1720- 42 - (Entire Document): Accept in Principle

SUBMITTER: Brian D. Johnson, International Association of Fire Chiefs

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Accept entire document as proposed in current draft.

SUBSTANTIATION: The Board of Directors of the International Association of Fire Chiefs, present at the August 28, 2000 special board meeting, voted unanimously to support the current ROC draft document of the proposed standard. The IAFC Board of Directors reserve the right to change their support for the proposed standard if changes to the final draft are determined to be detrimental to its members.

COMMITTEE ACTION: Accept in Principle.

COMMITTEE STATEMENT: See actions taken on Committee Comment 1720-58 (Log #CC1).

(Log #113)

1720- 43 - (Entire Document): Reject

SUBMITTER: John P. McDonald, East Pierce Fire and Rescue

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete the standard in its entirety.

SUBSTANTIATION: The proposed standard does not recognize the dependent connection of a community's building and fire codes, its fire prevention programs and its emergency response resources in defining acceptable levels of fire protection. The relative levels of each of these and other protection components

should be decided locally based upon available conditions and resources.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #124)

1720- 44 - (Entire Document): Reject
SUBMITTER: David M. Durgin, Northborough Fire Department
COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: As the fire chief of the Town of Northborough and and NFPA member since 1987, I wish to go on record as opposing the drafts of NFPA 1710 and 1720, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments and by Volunteer Fire Departments.

In addition I would offer the following concerns:

- In a combination department of career and call firefighters, which standard would apply? Would there be two standards?
- There is no accommodation for the EMT-Intermediate level of emergency medical care. Currently, this department operates at this level of care.

- The requirement of two paramedics for ALS staffing is excessive and not cost effective. The alternate staffing of EMT-1 and EMT-P or EMT-P with an EMT-P assistant should be allowed.

- The current requirements of six hours initial SAED/AED training and two hours of quarterly training, coupled with an every two-year physician assessment, make this level of First Responder care cost prohibitive.

- The staffing requirement for structure suppression and IRIC are unobtainable for this department in the first eight minutes. While agreeing with this staffing level for effective operations and safety, major budget increases would be required, and mutual aid travel companies to fill the staffing void could not achieve this time restriction.

- Use of response time objectives and percentages are unrealistic given travel distances and road infrastructure. This community's roads range from two interstate highways to early New England hilly roads laid out in the 1700's.

- Wild land suppression staffing is excessive, and the need for two apparatus to respond to each incident is not realistic. With the average fire of one quarter acre on a Class Three day, two firefighters responding in a Type Six unit is safe and effective.

SUBSTANTIATION: In a perfect world with an unlimited budget, I would love to have the department you have outlined in NFPA 1710 and 1720. Unfortunately, this community could not afford the outlined staffing requirements for structure, EMS, and wild land suppression. I respectfully request that you rethink your position and adopt a standard which is safe, cost effective, and achievable.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #138)

1720- 45 - (Entire Document): Reject
SUBMITTER: Daniel J. Stevens, Waldorf Vol. Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete standard in its entirety.
SUBSTANTIATION: The Waldorf VFD is 250 members strong and responds to 13000+ calls annually. The administrative and legal burden placed on our organization by this standard will move us closer to a career system. NFPA continues to move into the management area vs the technical area where you do the fire service more good.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #139)

1720- 46 - (Entire Document): Reject
SUBMITTER: Daniel J. Stevens, Waldorf Vol. Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete 1720 in its entirety.
SUBSTANTIATION: The burden this will place on volunteer departments in certain areas of the country will not only reduce

their efficiency because of the added administrative burden but it will also increase the liability exposure. These two things will weaken the volunteers service as it will be more difficult to attract qualified people because of the liability issue and the talent in place will be diverted to administrative activities.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #143)

1720- 47 - (Entire Document): Reject
SUBMITTER: Mike Harris, Olympia, WA
COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Please delete proposed 1710 and 1720 in their entirety.
SUBSTANTIATION: All of these proposals are decisions that must be made at the local level without the pressure that NFPA adds.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #153)

1720- 48 - (Entire Document): Reject
SUBMITTER: Wayne Waggoner, Tennessee Fire Code Development Committee
COMMENT ON PROPOSAL NO: 1720-239

RECOMMENDATION: This standard needs to be returned back to the committee and combined to show no difference between Combination, Volunteer, and Career department.

SUBSTANTIATION: The TFCDC representing the TFC TFSIA feels that there should be one standard for the deployment of fire service for all types of departments (name dept). This standard should address the basic services provided by all fire department including suppression, prevention, public education, EMS, code enforcement, and special operations. This standard should address what services fire department provide not how to provide them. This standard should serve as a series of benchmarks or goals for all communities to follow rather than a requirement. It is contrary to the political climate of our nation to dictate how services are provided at the local level. In every aspect of our society, decisions such as these are made at the local level. Once time elements are removed from both NFPA 1710 & 1720 the similarities between the two, should allow the two standards be combined as one. Both NFPA 1710 & 1720, or as the TFCDC proposal of combining the documents, should be produced as a RECOMMENDED PRACTICE instead of a Standard.

As stated by Cortez Lawrence, Auburn Public Safety Dept., AL [E] in his statement regarding his negative vote on NFPA 1710 which applies to NFPA 1720 as well, Mr. Lawrence said: "Conceptually I favor community based performance standards. Competent fire service leadership together with other interested groups can develop and evaluate deployment and response standards that best fit a community. While I consider the performance standard for staffing as reasonable for most suburban/urban communities, it is reasonable to allow alternative methodologies to be used to achieve desired outcomes. There is no empirical evidence to support the proposed standard."

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #154)

1720- 49 - (Entire Document): Reject
SUBMITTER: Southern Regional Fire Code Dev. Committee
COMMENT ON PROPOSAL NO: 1720-1

RECOMMENDATION: Approve the original proposal and retile the document to "Guide for Fire Service Deployment".

SUBSTANTIATION: We agree with the submitters substantiation as originally submitted. The determination of levels of service is a public policy determination to be established by the AHJ associated with paying for the level of services adopted. Since basic fire suppression is not a mandated level of service statewide let alone nationally, a national standard does not make sense.

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

However, once a AHJ has decided to provide a level of service they may appreciate a guide for formulating public policy. NFPA 1720 allows for the AHJ to set public policy, unlike NFPA 1710 which mistakenly presumes to know what's best for the AHJ. This proposal also supports the total withdrawal of NFPA 1710.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #157)

1720- 50 - (Entire Document): Reject
SUBMITTER: Southern Regional Fire Code Dev. Committee
COMMENT ON PROPOSAL NO: 1720-257
RECOMMENDATION: Delete the proposed standard.
SUBSTANTIATION: This is a tremendous unfunded mandate for all communities.

Both NFPA 1710 and NFPA 1720 take away a local government's ability to decide how to best deal with fire protection, depending on the local environment. Minimum manning standards, as expressed in the NFPA proposal, take away the ability of each local government to respond to local needs and conditions-which includes fire prevention and EMS-not just fire suppression. One broad-brush mandate for all situations does not work and we are strongly opposed to an agency or association such as NFPA mandating yet another set of costly proposals, without regard and deference to decision making of local elected officials and fire chiefs.

NFPA is assuming a legislative role that it has no authority for. Congress, state legislatures, OSHA and state labor agencies are the appropriate forums for this type of rule making, where a vehicle for public hearings can take place.

For your information, lots of American cities are dealing with severe financial constraints placed on them as a result of the passage of Initiative 695, a measure passed by the people of Washington which takes away revenues and requires any new tax measures to be approved by the people. Such financial limitations make it essential for each local government to make the most efficient use of its resources to provide the services and priorities as determined by their local elected officials. Many of our fire chiefs, and the Washington State Association of Fire Chiefs, have expressed technical concerns with the proposals, as indicated in their comments, which have been submitted directly to you.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #158)

1720- 51 - (Entire Document): Reject
SUBMITTER: Beverly Estes, Pierce County Fire Dist. 13
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 in its entirety.
SUBSTANTIATION: Rural Fire Districts cannot financially or logistically comply with these unrealistic proposed standards. It is in the best interests of the taxpayer that these deployment decisions be left to local elected officials who are responsible for the operations of the Fire Department. These decisions are local policy issues which should not be mandated by special interest groups.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #159)

1720- 52 - (Entire Document): Reject
SUBMITTER: Rick Ujelle, Snohomish County Fire Protection District 17
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete 1710 in its entirety. Delete the four minute response time requirement in 1710 5.2.3.1.1. Delete all of Chapter 5 in regard to staffing minimums.
SUBSTANTIATION: These standards are not fiscally obtainable for non-metro fire departments of the 70 fire stations in Snohomish County. Approximately half rely on from home volunteer response for apparatus staffing.
COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #160)

1720- 53 - (Entire Document): Accept
SUBMITTER: Michael Chiaramonte, Lynbrook Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: The Volunteer Chief Officers Section of the International Association of Fire Chiefs feels that the NFPA 1720 Standard for the Organization and Deployment of Fire Suppression, Emergency Medical Operations and Special Operations to the Public by Volunteer Fire Departments is a fair and equitable standard.
SUBSTANTIATION: However, we feel that it promotes discrimination in the fire and EMS service. It does this by establishing a dual standard for these services. As a group we are largely responsible for the implementation of standards, we have historically expressed that a dual standard is not acceptable, again due to its discriminatory nature. If we are to have a standard at all, it should be a single standard for the entire fire and EMS service, including combination departments. This standard should be a menu driven standard giving the Authority Having Jurisdiction (AHJ) the sole right to determine the level of service that is to be provided for that community.
COMMITTEE ACTION: Accept.

(Log #162)

1720- 54 - (Entire Document): Reject
SUBMITTER: Michael O'Brien, Tilden Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Reject this idea.
SUBSTANTIATION: Reject this idea.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #171)

1720- 55 - (Entire Document): Reject
SUBMITTER: C. Barrett Graham, C. Barrett Graham, Pa, Attorney at Law
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: I propose that the standard NOT BE ADOPTED.
SUBSTANTIATION: Whenever a court is called upon to examine the conduct of an entity, eg. a fire department, it searches for a baseline standard of conduct which can be used to judge the behavior of the department. NFPA 1720 is one such baseline standard. It becomes a very useful weapon in the hands of a competent trial lawyer to establish the liability of the department. Unless something else is offered to the Court, 1720 will be the baseline standard the Court will use when instructing the jury on whether or not the department's performance was adequate.

This standard makes no allowance for the wide diversity of regulatory, social, economic, geographical, demographic, meteorological and cultural factors which influence volunteer fire department operations nationwide (and, of course, North Carolina). Given this diversity of influences on the operations of volunteer departments both nationally and in North Carolina, a written standard of performance for all of them imposes burdens on some departments and may not be sufficiently comprehensive for others. Such standards cause more problems than they solve.

The concept of OSHA is a very good thing. However, I question the sometimes vigorous enforcement of some small details in the regulations. In turn, I see two major problems with our volunteer departments and OSHA.

The first problem is the obvious one of funding the compliance requirements. Most volunteer departments in North Carolina are stretched financially about as far and tight as they can be stretched already. The second problem is, to me, far more dangerous. The highly political nature of a volunteer fire department makes it a prime target for actual or bogus OSHA complaints generated by disgruntled active or former members.

They in turn, can hide behind whistle-blower statutes and snipe to their hearts' content.

Trial lawyers have discovered North Carolina's (as well as other States') volunteer fire departments. They now realize that most departments are insured (carrying "deep pockets") and therefore are economically viable targets for litigation. This activity is driven by several factors. Lawyers are created by (or moving into) most States (and North Carolina) faster than the employment market can absorb them. This causes them to "hang out their shingles" and go in search of pieces of the economic pie wherever they can be found. In addition, law firms constantly seek mechanisms for economic expansion. This leads to creative ideas for litigation and/or exploration of areas of activity which heretofore have been ignored. The rules of the North Carolina State Bar (and, I suspect, most other States) governing the conduct of a lawyer require a lawyer to pursue a matter on behalf of a client zealously until it is concluded. This causes the lawyer to pursue a matter even though he or she may not really want to do so. Then, being "stuck" with the case, the lawyer must pursue the thing in order to try to get paid.

Your correspondent is a member of the Newport Fire Department (Newport, NC) and a North Carolina Certified Firefighter II and North Carolina Certified Fire Service Instructor II, with 21 (+) years experience in the Fire Service.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #175)

1720- 56 - (Entire Document): Reject

SUBMITTER: Dwight B. Van Zanen, Maple Valley Fire and Life Safety

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Delete "volunteer" and "substantially all volunteer" in all locations they are found.

Add "serving a population of 250,000 or less directly or by contract", as the controlling criteria for applicability.

SUBSTANTIATION: This standard is all that should be necessary as a minimum deployment standard for all but the larger metro fire departments. This proposal in combination with a companion proposal for 1710, will clearly identify which standard should apply to all organizations.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: The committee, prior to beginning their development of the standard requested from NFPA Standards Council permission to remove the term "substantially" from the scope. The Council was clear in their decision that the term remain in both standards, NFPA 1710 and 1720 and that the AHJ determine a definition for how they implement the standard(s) in either a "substantially" career or "substantially" volunteer department.

(Log #176)

1720- 57 - (Entire Document): Reject

SUBMITTER: William A. Jetter, Sycamore Township EMS & Fire Department

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: These comments are in regard to NFPA 1710/1720 proposed standards. In general I have a philosophical problem with the NFPA getting into manning standards for Fire Departments because of the vast number of diverse departments in this nation. The NFPA has no business getting involved in the local jurisdictional issues which are represented in the 1710/1720 proposals. I feel you have overstepped your bounds. As a member of the NFPA (Membership ID# 000144922) I feel the sole purpose of the NFPA is to provide a working environment in the various areas of fire prevention and fire safety. As a member I feel you are misrepresenting this issue. This is not in the best interest of my department or the community at large. This is not a dictatorship. I realize this is only a standard from the NFPA. However, in the past these standards have been used against us in a court of law, thereby doing more damage than good.

SUBSTANTIATION: I feel the NFPA is placing undue hardship on the community of Sycamore Township with this proposed action. You are creating not only funding issues, but future staffing issues that will impact the growth of this department. I realize these standards are meant to provide some resolution to the problem of full time staffing, but if you look at the

environment in certain parts of the country you will find there are not enough qualified people available to work in our service. Furthermore I object to these proposals and submit to you as a member that the standards committee cease and desist in this area. I feel if the NFPA continues along this road with these standards you can expect to have some outside litigation in the future.

I will be happy to sit and discuss this with you in committee form, however, my comments in this letter are pretty straightforward. Also, I would like these comments to be counted separately from the compilation of responses to the 1710/1720 standards. I have an individual voice and it should be heard.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #CC1)

1720- 58 - (Entire Document): Accept

SUBMITTER: Technical Committee on Fire and Emergency Service Organization and Deployment - Volunteer

COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Accept the document with changes made based on public comments.

SUBSTANTIATION: While the committee is divided on the issue of separate standards they have developed a standard that is based on a "substantially" volunteer fire departments ability to provide service(s) to the municipality. The standard outlines the need for the fire department to be involved in community planning, and working cooperatively with the authority having jurisdiction. The committee is committed to working with the other technical committee on deployment (NFPA 1710) to resolve conflicts regarding combination fire departments. It is the intent of this Technical Committee to work within the standards-making process to address those concerns which were held for further study. The work done by this technical committee has been endorsed by the IAFC Board of Directors, as well as the Volunteer Section of the IAFC.

COMMITTEE ACTION: Accept.

(Log #148)

1720- 59 - (Title): Reject

SUBMITTER: Wayne Waggoner, Tennessee Fire Code Development Committee

COMMENT ON PROPOSAL NO: 1720-2

RECOMMENDATION: Revise the title to read:

"Standard for Combination and Volunteer Fire Service Deployment."

SUBSTANTIATION: A title change is needed to allow the departments that are combination, this standard will be applicable. There is no guidance for the AHJ to use when trying to determine if a fire department is a combination department while reviewing 1710 or 1720. How do we substantiate substantially, is it 51%, 66% or what? The committee uses the word substantially in the scope and the manual of Style states that substantially is not to be used in the development of Code or Standards. After reviewing 1710 we cannot find any reference to AHJ being able to identify if the fire department is a combination department, therefore a combination department should be addressed in 1720.

In the Committee Statement you reference log number 252, which has no bearing on the submitted proposal. The word combination was not added to the title.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: The committee feels that this issue is addressed by Section 1.2.3* and accompanying annex material, that allows the AHJ to determine if this standard, or it's companion standard NFPA 1710 is applicable to their fire department. Both technical committees have discussed the issue of combination departments and they felt that was a decision to be made by the AHJ. There are many variations of combination fire departments that the committee did not feel that is within the scope of this project, or document to write text those many variations.

(Log #151)

1720- 60 - (Title): Reject
SUBMITTER: Wayne Waggoner, Tennessee Fire Code Development Committee
COMMENT ON PROPOSAL NO: 1720-4
RECOMMENDATION: Revise the title of the document to read as follows:
 "Standard for the Organization and Deployment of Fire Suppression, Emergency Medical Operations and Special Operations to the Public by Volunteer or Combination Fire Departments."
SUBSTANTIATION: Even though the change was submitted and accepted the title does not reflect the purpose of the standard. There is no guidance for the authority having jurisdiction to use when trying to determine if a fire department is a combination department while reviewing 1710 or 1720. How do we substantially, is it 51 percent or 66 percent or what? The committee uses the word substantiate substantially in the purpose 1.2.3 and the Manual of Style states that substantially is not to be used in the development of Code or Standards. After reviewing 1710 we cannot find any reference to authority having jurisdiction being able to identify if the fire department is a combination department, therefore a combination department should be addressed in 1720. The word combination was not added to the title. The title should read Standard for the Organization and deployment of fire suppression, emergency medical operations and special operations to the public by Volunteer and/or Combination Fire Departments.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-59 (Log #148).

(Log #152)

1720- 61 - (Title): Reject
SUBMITTER: Wayne Waggoner, Tennessee Fire Code Development Committee
COMMENT ON PROPOSAL NO: 1720-1
RECOMMENDATION: Revise the document title to read:
 "Standard Guide for Volunteer Fire Service Deployment."
SUBSTANTIATION: We feel that this document should be a guideline and provide benchmarks for the Organization and deployment of fire suppression, emergency medical operations and special operations to the public by Volunteer and/or Combination Fire Departments. On several proposals the committee in their statement has used the word parallel, if the 2 proposed standards, 1710 and 1720 are attempting to be parallel then there is only a need for one guideline for the fire service.
 The submitter's substantiation has a lot of merit. NFPA should not dictate public policy.

- This is a tremendous unfunded mandate for all communities.
- Both NFPA 1710 and NFPA 1720 take away a local government's ability to decide how to best deal with fire protection, depending on the local environment. Minimum manning standards, as expressed in the NFPA proposal, take away the ability of each local government to respond to local needs and conditions-which includes fire prevention and EMS-not just fire suppression. One broad brush mandate for all situations does not work and we are strongly opposed to an agency or association such as NFPA mandating yet another set of costly proposals, without regard and deference to decision making of local elected officials and fire chiefs.
- NFPA is assuming a legislative role that it has no authority for. Congress, state legislatures, OSHA and state labor agencies are the appropriate forums for this type of rule making, where a vehicle for public hearings can take place.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-59 (Log #148).

(Log #155)

1720- 62 - (Title): Reject
SUBMITTER: Southern Regional Fire Code Dev. Committee
COMMENT ON PROPOSAL NO: 1720-1
RECOMMENDATION: Retitle the document to "Guide for Volunteer Fire Service Deployment".
SUBSTANTIATION: The determination of levels of service is a public policy determination to be established by the authority having jurisdiction associated with paying for the level of services adopted. Since basic fire suppression is not a mandated level of

service statewide let alone nationally, a national standard does not make sense.
 However, once a authority having jurisdiction has decided to provide a level of service they may appreciate a guide for formulating public policy. NFPA 1720 allows for the authority having jurisdiction to set public policy.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-59 (Log #148).

(Log #156)

1720- 63 - (Title): Reject
SUBMITTER: Southern Regional Fire Code Dev. Committee
COMMENT ON PROPOSAL NO: 1720-1
RECOMMENDATION: Revise the document title to "Guide for Combination and Volunteer Fire Service Deployment".
SUBSTANTIATION: Combination departments are not covered by either 1710 or 1720 and should be addressed by this document. There are many departments that are both volunteer and combination and this document leaves a large void in determining levels of service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-59 (Log #148).

(Log #13)

1720- 64 - (1-1): Reject
SUBMITTER: Richard Kistler, Thurston County Fire Protection District # 7
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "substantially all volunteer" from the scope.
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee, prior to beginning their development of the standard requested from NFPA's Standards Council permission to remove the term "substantially" from the scope. The Council was clear in their decision that the term remain in both standards, NFPA 1710 and 1720 and that the authority having jurisdiction determine a definition for how they implement the standard(s) in either a "substantially" career or "substantially" volunteer department.

(Log #19)

1720- 65 - (1-1): Reject
SUBMITTER: Richard Gleckler, Thurston County Fire Protection District #7
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "substantially all volunteer" from the scope.
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-64 (Log#13).

(Log #21)

1720- 66 - (1-1): Reject
SUBMITTER: Mike Berman, Thurston County Fire Protection District #7
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "substantially all volunteer" from the scope.
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-64 (Log#13).

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

(Log #23)

1720- 67 - (1-1): Reject
SUBMITTER: Raymond L. Harry, Thurston County Fire Protection District # 7
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "substantially all volunteer" from the scope.
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-64 (Log#13).

(Log #48)

1720- 68 - (1-1): Reject
SUBMITTER: Dwight B. Van Zanen, Maple Valley Fire and Life Safety KCFD #43
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text as follows:
"1.1 ...by substantially all volunteer fire departments."
(throughout) delete "volunteer" as a descriptive condition.
SUBSTANTIATION: With minor modifications, the standard can be used by all fire departments. Service delivery issues do not change due to the employment status of the staff. A single standard should be adopted for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-64 (Log#13).

(Log #52)

1720- 69 - (1-1): Reject
SUBMITTER: Richard Small, Thurston County Fire Protection District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "substantially all volunteer" from the scope.
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-64 (Log#13).

(Log #54)

1720- 70 - (1-1): Reject
SUBMITTER: Ken Parsons, Thurston County Fire Protection District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "substantially all volunteer" from the scope.
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-64 (Log#13).

(Log #56)

1720- 71 - (1-1): Reject
SUBMITTER: Arthur Getchman, Thurston County Fire Protection District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "substantially all volunteer" from the scope.
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-64 (Log#13).

(Log #57)

1720- 72 - (1-1): Reject
SUBMITTER: Brian K. VanCamp, Thurston County Fire Protection District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete "substantially all volunteer" from the scope.
SUBSTANTIATION: With these modifications, this standard could be used by career, volunteer, and combination organizations, promoting one standard for the fire service.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-64 (Log#13).

(Log #85)

1720- 73 - (1-1): Hold
SUBMITTER: Edward F. Busch, East Islip Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding text to read as follows:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: The committee feels that the issue of combination fire departments needs to be discussed and addressed in the standards-making process. To introduce numbers, or some form of quantification at the ROC stage would not allow for public review and comment. The committee will be working with the career deployment committee, and will address this issue with NFPA's Standards Council. It is the intent of this committee to work within the process and resolve this issue in the next edition of the standard.

(Log #88)

1720- 74 - (1-1): Hold
SUBMITTER: John C. Harrison, Mattituck Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #94)

1720- 75 - (1-1): Hold
SUBMITTER: Steve Fellmeth, Greenlawn Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #98)

1720- 76 - (1-1): Hold
SUBMITTER: Steven Schaefer, Eastport Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

(Log #102)
1720- 77 - (1-1): Hold
SUBMITTER: Edmund J. Downes, Sag Harbor Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #111)
1720- 78 - (1-1): Hold
SUBMITTER: David Crohan, Flanders Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of the standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #118)
1720- 79 - (1-1): Hold
SUBMITTER: Richard McGowin, Montauk Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #121)
1720- 80 - (1-1): Hold
SUBMITTER: Rudolph A. Sunderman, Mastic Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #126)
1720- 81 - (1-1): Hold
SUBMITTER: James M. Feeley, Centerport Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #130)
1720- 82 - (1-1): Hold
SUBMITTER: Joseph R. Jahelka, Quogue Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."

SUBSTANTIATION: "Substantially all volunteer" is vague and does not define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #131)
1720- 83 - (1-1): Hold
SUBMITTER: William Mirabelli, Brookhaven Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #135)
1720- 84 - (1-1): Reject
SUBMITTER: Alan D. Predmore, City of Buckley Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
"This standard contains minimum suggested best practice requirements relating to the organization and deployment of fire suppression operations, emergency medical operations, and special operations to the public by substantially all volunteer fire departments."
SUBSTANTIATION: While NFPA 1720 attempted to establish a level or requirements, and identifies them as minimum requirements, nothing establishes what a high level of standard would be. The intent should be to establish what is a best practice, rather than a minimum requirement. NFPA has not before, and should not now create dual standards for the fire service. I am also proposing the deletion of NFPA 1710 in its entirety, and propose that NFPA 1720 be for all fire departments regardless of their composition.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-39 (Log #100).

(Log #142)
1720- 85 - (1-1): Hold
SUBMITTER: Christopher Mele, Smithtown Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #144)
1720- 86 - (1-1): Hold
SUBMITTER: Frank Rosciano, Dix Hills Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding and combination fire departments having less than 50% career firefighters.
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #177)
1720- 87 - (1-1): Hold
SUBMITTER: Thomas R. Cullins, Eastport Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding "and combination fire departments having less than 50% career firefighters".

SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #136)

1720- 91 - (1-1.2): Reject
SUBMITTER: Alan D. Predmore, City of Buckley Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Revise text to read as follows:
"This standard also contains ~~minimum requirements~~ suggested best practice requirements for managing resources and systems, such as health and safety, incident management, training, communications, and pre-incident planning."

SUBSTANTIATION: While NFPA 1720 attempted to establish a level of requirements, and identifies them as minimum requirements, nothing establishes what a high level of standard would be. The intent should be to establish what is a best practice, rather than a minimum requirement.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-39 (Log #100).

(Log #114)

1720- 88 - (1-1.1): Hold
SUBMITTER: David H. Fischler, Yaphank, NY
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Continue by adding:
"...and combination fire departments having less than 50 percent career firefighters."
SUBSTANTIATION: "Substantially" is vague and does not properly define the application of this standard.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #134)

1720- 92 - (1-2.1): Reject
SUBMITTER: Alan D. Predmore, City of Buckley Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259

RECOMMENDATION: Revise text to read as follows:
"The purpose of this standard is to specify the minimum criteria addressing the effectiveness and efficiency of the ~~volunteer~~ public fire suppression operations, emergency medical service, and special operations delivery in protecting the citizens of jurisdiction."

SUBSTANTIATION: I am proposing the deletion of NFPA 1710 in its entirety. This proposed deletion of text allows NFPA 1720 to be used by all fire service jurisdictions.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Action taken on Comment 1720-59 (Log #148).

(Log #149)

1720- 89 - (1-1.1.3): Reject
SUBMITTER: Wayne Waggoner, Tennessee Fire Code Development Committee
COMMENT ON PROPOSAL NO: 1720-14
RECOMMENDATION: Revise text to read as follows:
1-1.1.3 This standard is applicable to those fire departments whose emergency response deployment is ~~substantially all either combination or volunteers.~~
SUBSTANTIATION: There is no guidance for the AHJ to use when trying to determine if a fire department is a combination department while reviewing 1710 or 1720. How do we substantiate substantially, is it 51%, 66% or what? The committee uses the word substantially in the scope and the manual of Style states that substantially is not to be used in the development of Code or Standards. After reviewing 1710 we cannot find any reference to AHJ being able to identify if the fire department is a combination department, therefore a combination department should be addressed in 1720.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-59 (Log #148).

(Log #123)

1720- 93 - (1-2.3): Reject
SUBMITTER: Cotton Cole, South Carolina State Association of Fire Chiefs

COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
"The authority having jurisdiction ~~determines~~ should use this standard as a goal for their department to achieve ~~if this standard is applicable to their fire department.~~"

SUBSTANTIATION: This statement is somewhat ambivalent - it is either a recommended standard for all volunteer departments or it is not. It is also confusing (NFPA 1720) how it relates to combination departments.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-39 (Log #100).

(Log #150)

1720- 90 - (1-1.1.3): Hold
SUBMITTER: Wayne Waggoner, Tennessee Fire Code Development Committee
COMMENT ON PROPOSAL NO: 1720-12
RECOMMENDATION: This standard should apply to all but the 100 percent career department that falls under NFPA 1710.
SUBSTANTIATION: There is no guidance for the AHJ to use when trying to determine if a fire department is a combination department while reviewing 1710 or 1720. How do we substantiate substantially, is it 51 percent, 66 percent or what? The committee uses the word substantially in the scope and the manual of Style states that substantially is not to be used in the development of Code or Standards. After reviewing 1710 we cannot find any reference to AHJ being able to identify if the fire department is a combination department, therefore a combination department should be addressed in 1720.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-73 (Log #85).

(Log #178)

1720- 94 - (2-3.1.6): Reject
SUBMITTER: Gary F. Duignan, Forestville Fire Protection District

COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete.
SUBSTANTIATION: Sometimes a company must be broken up at the scene to perform various tasks. The Officer may not be in the immediate area.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee feels that the current text reflects the intent of the committee, and that the officer serves an important role in the communication process. Supervising a company/crew is a primary responsibility of an officer and the text reflects current language in NFPA 1500, and requirements under 29CFR1910.134 of the OSHA Respiratory Protection Regulations promulgated in January of 1998.

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

(Log #147)

1720- 95 - (2-3.2): Reject
SUBMITTER: Wayne Waggoner, Tennessee Fire Code Development Committee
COMMENT ON PROPOSAL NO: 1720-137
RECOMMENDATION: Replace existing text with the following:
2-3.2 The fire department's fire suppression resources shall be deployed to provide for the arrival of an Engine Company and full initial alarm assignment as quickly as possible and in accordance with NFPA 1500.
Delete:
2-3.2 Upon assembling the necessary resources, the fire department shall have the capability to safely initiate an initial attack in accordance with NFPA 1500, within two minutes 90 percent of the time.
SUBSTANTIATION: There are no mechanisms to measure the 2 min attack time 90 percent of the time. The reference to NFPA 1500 is primarily a safety issue, although NFPA 1500 does identify the initial attack in section 6-4.4.5 Emergency Operations Chapter 6. The AHJ should be able to initiate the attack at any time they feel they have all the necessary resources to safely make the attack. Section 4-2.2. Initial Attack covers the operations for initiating an attack. Time restraints in the standard will create or contribute to unsafe operating and scene conditions for personnel.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: This is currently 4.2.2.3 in the ROP draft, and the committee feels that the current text is sufficient and allows the fire department to meet the intent of the submitter.

(Log #179)

1720- 96 - (2-3.2): Accept in Principle
SUBMITTER: Gary F. Duignan, Forestville Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: None.
SUBSTANTIATION: Confusing. Is this after arrival at the hydrant, in front of the involved structure, or what?
COMMITTEE ACTION: Accept in Principle.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log#8)

(Log #59)

1720- 97 - (3-1.3 Crew, Team): Reject
SUBMITTER: Gregory C. Berk, Fire Chief, Flossmoor Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: The committee defined company (3.1.3) but uses the terms "crew" and "team" in the document without definition. Provide definitions for "crew" and "team" or be consistent in the use of these terms.
SUBSTANTIATION: Interchanging terms can confuse people using this document.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The Technical Committee feels that the submitters request is already identified in the definition 3.1.3* Company, where the term team and crew are used within the definition as their are synonymous with the term company.

(Log #12)

1720- 98 - (Chapter 4): Reject
SUBMITTER: Tommie Brice, King County Fire Protection District No 27
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 Chapter 4 in its entirety. (Chapter 4 Organization, Operation, and Deployment)
Delete Chapter 4 Text and Title entirely.
SUBSTANTIATION: Deletion of Chapter 4 of NFPA 1720 second draft will preserve the responsibility of local elected officials of the jurisdiction having authority, to determine and implement an appropriate level of fire and emergency services, commensurate with the risk exposure and available funding of the community served.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #49)

1720- 99 - (Chapter 4): Reject
SUBMITTER: David Hart, King County Fire Protection District No 27
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 Chapter 4 in its entirety.
(Chapter 4 Organization, Operation, and Deployment)
Delete Chapter 4 Text and Title entirely.
SUBSTANTIATION: Deletion of Chapter 4 of NFPA 1720 second Draft will preserve the responsibility of local elected officials of the jurisdiction having authority, to determine and implement and appropriate level of fire and emergency services, commensurate with the risk exposure and available funding of the community served.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log#8).

(Log #50)

1720- 100 - (Chapter 4): Reject
SUBMITTER: Christopher J. Connor, King County Fire Protection District No. 27
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 Chapter 4 in its entirety.
(Chapter 4 Organization, Operation, and Deployment)
Delete Chapter 4 Text and Title entirely.
SUBSTANTIATION: Deletion of Chapter 4 of NFPA 1720 second Draft will preserve the responsibility of local elected officials of the jurisdiction having authority, to determine and implement an appropriate level of fire and emergency services, commensurate with the risk exposure and available funding of the community served.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log#8).

(Log #69)

1720- 101 - (Chapter 4): Reject
SUBMITTER: Ronald J. Davis, Hoquiam, WA
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 in its entirety.
SUBSTANTIATION: Rural fire districts are unable to financially or logistically comply with these unrealistic proposed standards. The deployment decisions should be determined by the elected officials at the local level. Our decisions at the local level are far better than a mandated special interest group making decisions about concerns they know nothing about.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #71)

1720- 102 - (Chapter 4): Reject
SUBMITTER: Carl A. Koch, Snohemish County Fire District # 14
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Do away with 1720 completely - Delete NFPA 1720 in its entirety.
SUBSTANTIATION: Rural fire districts cannot financially or logistically comply with these unrealistic proposed standards. It is in the best interest of the taxpayer that these deployment decisions be left to local elected officials who are responsible for the operations of the fire department. These decisions are local policy issues not special interest groups.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #76)

1720- 103 - (Chapter 4): Reject
SUBMITTER: Troy Finlayson, Pierce Co, Fire Dist. 13/Rep. PCFD 13
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 in its entirety.
SUBSTANTIATION: Rural Fire Districts cannot financially or logistically comply with these unrealistic proposed standards. It is in the best interests of the taxpayers that these deployment decisions be left to local elected officials who are responsible for the operations of the Fire Department. These decisions are local policy issues which should not be mandated by special interest groups.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

SUBSTANTIATION: Rural Fire Districts cannot financially or logistically comply with these unrealistic proposed standards. It is in the best interests of the taxpayer that these deployment decisions be left to local elected officials who are responsible for the operations of the Fire Department. These decisions are local policy issues which should not be mandated by special interest groups.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #47)

1720- 108 - (4-1, 4-2): Reject
SUBMITTER: Anthony E. Conrardy, Centereach Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Add new text (either Section 4.1 or 4.2) as appropriate:

(Log #81)

1720- 104 - (Chapter 4): Reject
SUBMITTER: Charles E. Campbell, Rep. Commissioner Chelan County Fire District No. 5
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 in its entirety as a mandated standard.
SUBSTANTIATION: There are too many "shalls" in this document. In small Fire Districts it is necessary to prioritize what things we "shall" do and what things we should do if resources become available. If each "shall" were changed to "should" they would represent reasonable expectations as it is now 1720 mandates items which may or may not be achievable with available resources. 1720 appears to be an attempt to force centralized micro management on decentralized organizations.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement by the committee on Comment 1720-6 (Log #8).

The Incident Commander shall conduct a cause and origin investigation, or cause such investigation to be conducted, of all fires and/or explosions within their jurisdiction. The Incident Commander shall conduct or initiate this investigation as soon as reasonably possible to ensure that fire and/or explosion scene conditions and evidence are secured and preserved. When local, state, or federal statutes require such investigations, they shall be conducted in accordance with NFPA 921, Guide for Fire and Explosion Investigations.

SUBSTANTIATION: Most fire departments are subject to local and state statutes that require this action be conducted (usually by the Chief Officer) and it is important that the incident commander initiates these investigations and contacts the appropriate investigatory agencies promptly. Chief Officers may not necessarily be the Incident Commander and other officers should be made aware of this need.

The information gathered through a thorough and prompt cause and origin investigation provides the Fire Department with accurate information that may be required for reports that are required in Section 4.1.6 and further elaborated in Section A.4.1.6.

(Log #172)

1720- 105 - (Chapter 4): Reject
SUBMITTER: Ralph Schaefer, Spokane County Fire District #8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 in its entirety.
SUBSTANTIATION: Rural Fire Districts cannot financially or logistically comply with these unrealistic proposed standards. It is in the best interests of the taxpayer that these deployment decisions be left to local elected officials who are responsible for the operations of the Fire Department. These decisions are local policy issues which should not be mandated by special interest groups.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

Evidence or suspected incendiary fires or explosions can be properly identified and preserved by individuals certified and trained to conduct such investigations. In addition, the chain of custody of evidence can be preserved and contamination of the scene can be kept to a minimum. These people can advise the Incident Commander on these situations.

Though sections of Chapter 4 provide general guidelines, it does not go far enough to ensure proper fire data is acquired and these investigations are initiated promptly and conducted by trained personnel. Some volunteer fire departments, as well as some career, may not understand the importance of this need and the resources available to them. It is important to make them aware.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The submitters request is outside the scope of this document.

(Log #173)

1720- 106 - (Chapter 4): Reject
SUBMITTER: Ken Kessler, Spokane County Fire District #8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 in its entirety.
SUBSTANTIATION: Rural Fire Districts cannot financially or logistically comply with these unrealistic proposed standards. It is in the best interests of the taxpayer that these deployment decisions be left to local elected officials who are responsible for the operations of the Fire Department. These decisions are local policy issues which should not be mandated by special interest groups.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-6 (Log #8).

(Log #60)

1720- 109 - (4-1.2): Reject
SUBMITTER: Fred C. Windisch, Harris County Fire & Rescue
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:

"...shall identify the need to develop a community risk management plan regarding hazardous materials and produce a plan that addresses the specific community's exposure to hazardous materials."

SUBSTANTIATION: Some communities may not have the resources or the community support to participate in a process as the original wording states. This proposal allows the fire department and the community to determine the need of a RMP and then implement if resources are available.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee feels that the fire department is required to be involved in the planning process as required by SARA Title III legislation. The current text reflects that requirement.

(Log #174)

1720- 107 - (Chapter 4): Reject
SUBMITTER: Gregory Hesse, Spokane County Fire District #8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1720 in its entirety.

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

1720- 110 - (4-1.2): Reject (Log #163)
SUBMITTER: Lyle Beard, Seal Rock Rural Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: The fire department shall ~~shall~~ should.
SUBSTANTIATION: Many volunteer fire dept. do not have the manpower to do this. With the wording "shall" it would make them open to litigation. In rural areas some or/all these catagoreis are regulated by other agencies that the fire service has no control over.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The standard requires the use of manadatory text.

1720- 111 - (4-1.6): Reject (Log #61)
SUBMITTER: Fred C. Windisch, Harris County Fire & Rescue
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
Old - The fire department shall maintain a standard reporting system.
Proposed - The fire department must participate in the NFIR System.
SUBSTANTIATION: This proposal allows for a Standard Reporting System that will enhance the fire service's data availability and accuracy.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The current annex text A.4.1.6 allows for the use of NFIRS.

1720- 112 - (4-1.8): Accept in Principle (Log #164)
SUBMITTER: Lyle Beard, Seal Rock Rural Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: ~~shall~~ should
Wording should include special structures, businesses etc. but not necessary for normal residences.
SUBSTANTIATION: We do not have the manpower, nor will many residences even let us in to do pre-plans on their homes. People consider this infringement on their right to privacy. In specific cases, this could show the Dist. to be at fault in situations we do not have control of.
COMMITTEE ACTION: Accept in Principle;

The committee agrees with the intent of the submitter and have modified 4.1.9* to read as follows:
"The number and type of units assigned to respond to a reported incident shall be determined by either risk analysis and/ or pre-fire planning."
COMMITTEE STATEMENT: The committee feels that this is a requirement and not a recommendation, and that the use of the term "shall" is mandatory text.

1720- 113 - (4-2, 4-2.2, 4-2.2.2): Reject (Log #110)
SUBMITTER: Ronald Caster, Washougal Fire & Rescue
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
"4.2.2.2 Initial attack operations shall be organized to ensure that at least (five) ~~four~~ members shall be assembled before initiating interior fire suppression operations at a working structure fire."
SUBSTANTIATION: Five assembled members will allow for an Incident Commander dedicated solely to that position. Under the current text, an Incident Commander can be part of the two in or two out. I believe this unduly jeopardizes the firefighter safety personnel accountability and implementation of an Incident Command System.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: This is a minimum standard. The committee feels that by specifying four that they meet the requirements of OSHA 29CFR. 1910.134, and NFPA 1500. Nothing within the standard prohibits the authority having jurisdiction from exceeding the minimum requirements of this standard.

1720- 114 - (4-2.1.6): Reject (Log #84)
SUBMITTER: Edward F. Busch, East Islip Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: This is a standard and requires the use of mandatory text.

1720- 115 - (4-2.1.6): Reject (Log #87)
SUBMITTER: John C. Harrison, Mattituck Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

1720- 116 - (4-2.1.6): Reject (Log #93)
SUBMITTER: Steve Fellmeth, Greenlawn Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

1720- 117 - (4-2.1.6): Reject (Log #97)
SUBMITTER: Steven Schaefer, Eastport Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

1720- 118 - (4-2.1.6): Reject (Log #103)
SUBMITTER: Edmund J. Downes, Sag Harbor Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

(Log #112)

1720- 119 - (4-2.1.6): Reject
SUBMITTER: David Crohan, Flanders Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep word "shall" directly conflicts with other NFPA standards for firefighters safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

(Log #128)

1720- 124 - (4-2.1.6): Reject
SUBMITTER: Joseph R. Jahelka, Quogue Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflict with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

(Log #115)

1720- 120 - (4-2.1.6): Reject
SUBMITTER: David H. Fischler, Yaphank, NY
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

(Log #133)

1720- 125 - (4-2.1.6): Reject
SUBMITTER: William Mirabelli, Brookhaven Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighters safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

(Log #117)

1720- 121 - (4-2.1.6): Reject
SUBMITTER: Richard McGowin, Montauk Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

(Log #141)

1720- 126 - (4-2.1.6): Reject
SUBMITTER: Christopher Mele, Smithtown Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

(Log #122)

1720- 122 - (4-2.1.6): Reject
SUBMITTER: Rudolph A. Sunderman, Mastic Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflict with other NFPA standards for firefighters safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

(Log #145)

1720- 127 - (4-2.1.6): Reject
SUBMITTER: Frank Rosciano, Dix Hills Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflicts with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log #84).

(Log #125)

1720- 123 - (4-2.1.6): Reject
SUBMITTER: James M. Feeley, Centerport Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflict with other NFPA standards for firefighters safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See action taken on Comment 1720-114 (Log #84).

(Log #165)

1720- 128 - (4-2.1.6): Reject
SUBMITTER: Lyle Beard, Seal Rock Rural Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete entire text. Orders should go through the chain of comand when possible if they have implications to other areas or scene safety. Changes in orders that effect overall operation should be through officers.
SUBSTANTIATION: If all orders on the fire ground had to go through officers, a fire fighter could not request a tool etc. from another fire fighter with out an officer. Officers have enough to worry about without this kind of distraction.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee feels that the communication process as required is an integral component of IMS, and enhances firefighter safety.The current text reflects the intent of the committee.

(Log #181)

1720- 129 - (4-2.1.6): Reject
SUBMITTER: Thomas R. Cullins, Eastport Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This section can have adverse impact on firefighter safety. An officer may be required to give orders directly to a firefighter to protect the firefighter from injury or death. To keep the word "shall" directly conflict with other NFPA standards for firefighter safety.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-114 (Log#84).

(Log #15)

1720- 130 - (4-2.2.1): Accept
SUBMITTER: Ken Walkington, Kitsap Co. Fire Dist #14
COMMENT ON PROPOSAL NO: 1710-259
RECOMMENDATION: Revise text to read as follows:
"Upon assembling the necessary resources at the emergency scene, the fire department shall have the capability to safely initiate attack within 2 minutes 90 percent of the time."
SUBSTANTIATION: When reading the original text, it could be misinterpreted as to where the resources are to be assembled. Adding the clarifier makes the intent crystal clear.
COMMITTEE ACTION: Accept.

(Log #166)

1720- 131 - (4-2.2.1): Reject
SUBMITTER: Lyle Beard, Seal Rock Rural Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: The fire department ~~shall~~ should have the capability to safely initiate an initial ~~attack within 2 min 90 percent of the time~~ as quickly as safety will allow.
SUBSTANTIATION: Fire fighters should not jeopardize there safety to meet a time requirement. They should respond in a timely manner. In rural areas there are too many variables to make a time minimum.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #16)

1720- 132 - (4-2.2.2): Accept in Principle
SUBMITTER: Ken Walkington, Kitsap Co. Fire Dist #14
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
"Initial attack operations shall be organized to ensure that at least four members shall be assembled and at-the-ready before initiating interior fire suppression operations at a working structure fire."
SUBSTANTIATION: When reading the original text, it could be misinterpreted as to where the resources are to be assembled since there is no definition of Assembled. Adding the clarifier makes the intent crystal clear.
COMMITTEE ACTION: Accept in Principle.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-130 (Log#15).

(Log #167)

1720- 133 - (4-2.2.4): Reject
SUBMITTER: Lyle Beard, Seal Rock Rural Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: The fire department ~~shall~~ should ... (last line) ... of the initial attack as much as manpower available allows.
SUBSTANTIATION: In volunteer service there is no way to insure this can happen. There will be times operation may need to stop for the safety and health of people on the fire ground.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #83)

1720- 134 - (4-3.3): Reject
SUBMITTER: Edward F. Busch, East Islip Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The NFPA Standards Making Process requires the use of the term shall to require mandatory text. Since this is a standard mandatory text is required. The submitters comment was addressed at the public proposal period and the committee feels that this document shall remain as a standard, and therefore will not be using permissive text.

(Log #86)

1720- 135 - (4-3.3): Reject
SUBMITTER: John C. Harrison, Mattituck Fire District
COMMENT ON PROPOSAL NO: 1720-599
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #95)

1720- 136 - (4-3.3): Reject
SUBMITTER: Steve Fellmeth, Greenlawn Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #96)

1720- 137 - (4-3.3): Reject
SUBMITTER: Steven Schaefer, Eastport Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #104)

1720- 138 - (4-3.3): Reject
SUBMITTER: Edmund J. Downes, Sag Harbor Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #116)

1720- 139 - (4-3.3): Reject
SUBMITTER: David H. Fischler, Yaphank, NY
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134(Log #83).

(Log #119)

1720- 140 - (4-3.3): Reject
SUBMITTER: Richard McGowin, Montauk Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #120)

1720- 141 - (4-3.3): Reject
SUBMITTER: Rudolph A. Sunderman, Mastic Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #127)

1720- 142 - (4-3.3): Reject
SUBMITTER: James M. Feeley, Centerport Fire Dept.
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #129)

1720- 143 - (4-3.3): Reject
SUBMITTER: Joseph R. Jahelka, Quogue Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly related to firefighter safety. The FCC has not provided a coordinated plan for public

safety communications. It is impossible to have each company have all of the equipment to communicate with all designated personnel. A communications plan's needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #132)

1720- 144 - (4-3.3): Reject
SUBMITTER: William Mirabelli, Brookhaven Fire District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #140)

1720- 145 - (4-3.3): Reject
SUBMITTER: Christopher Mele, Smithtown Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #146)

1720- 146 - (4-3.3): Reject
SUBMITTER: Frank Rosciano, Dix Hills Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change ~~shall~~ to should.
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #180)

1720- 147 - (4-3.3): Reject
SUBMITTER: Thomas R. Cullins, Eastport Volunteer Fire Department
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Change "shall" to "should".
SUBSTANTIATION: This change is directly to firefighter safety. FCC has failed to provide a coordinated plan for public safety communications. It is impossible to have each company have all equipment to communicate with all designated personnel. A communication plan is needed to coordinate communications between all agencies operating.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The standard requires the use of mandatory text.

(Log #17)

1720-148 - (4-4.3.1(1)): Reject
SUBMITTER: Ken Walkington, Kitsap Co. Fire Dist #14
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
"Initial response with a fire department apparatus to provide medical treatment at the location of the emergency [first responder with (AED) capability or higher]."
SUBSTANTIATION: Initial Responders who respond via personally owned vehicles are not always equipped with an AED. Often these people are the closest available resource and are an integral part of service delivery. Duty personnel respond in some kind of fire district apparatus, in those cases AED's should be required on all licensed BLS and ALS units. Adding the clarifier makes the intent crystal clear.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee feels that their intent is reflected in the current text.

(Log #18)

1720-149 - (4-4.3.1(1)): Hold
SUBMITTER: Ken Walkington, Kitsap Co. Fire Dist #14
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Add text to read as follows:
4.1.1 Scope: Include: In an attempt to bring greater clarity to the standard the following definition may be adopted by the jurisdiction having authority. "substantially shall mean greater than 49 percent of the response force"
SUBSTANTIATION: The dictionary defines substantially as "mostly or mainly." By providing a clearer definition jurisdictions will be able to identify which standard applies.
COMMITTEE ACTION: Hold.
COMMITTEE STATEMENT: See Committee Statement on 1720-73 (Log#85).

(Log #80)

1720-150 - (4-4.3.1(1)): Reject
SUBMITTER: Leon J. Thomas, Kitsap Fire District #14
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
"Initial response with a fire department apparatus to provide medical treatment at the location of the emergency [first responder with (AED) capability or higher]"
SUBSTANTIATION: Initial responders who respond via personally owned vehicles are not always equipped with an AED. Often these people are the closest available resource and are an integral part of service delivery. AED's should be required on all BLS and ALS units.
As an elected Fire Commissioner in a small Fire District of 25 square miles, I find that the proposed standards 1710 and 1720 are not attainable with our present financial and community base. We have 2200 registered voters in our community and have a budget of approximately \$480,000 per year with a budget of 106 percent increase for the next year. We have a total of 290 calls per year, 91 percent medical and 9 percent fire. We are staffed by two paid Fire Fighter/EMT Monday through Friday 8AM-4:30PM, with the help of 14 volunteers (8 EMT and 5 Fire Fighters) for nights and weekends.
Our three Commissioner Board does not feel that we need the minimum standard of response time and crew size set for us by an outside body. The response time and crew size is dictated to us by our community and their willingness to provide us with volunteers and tax money to support a paid staff.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement by the committee on Comment 1720-148 (Log #17).

(Log #168)

1720-151 - (4-4.3.2): Reject
SUBMITTER: Lyle Beard, Seal Rock Rural Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: The fire department ~~shall~~ can be involved ...

SUBSTANTIATION: The fire department can not be held responsible to provide service beyond their resources, possibly competing with privatized services in their area. This says we would have to provide transport even though a private amb. co. does that in part of our area.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee feels that the current text in 4.1.1 and 4.1.2 addresses service level issues.

(Log #169)

1720-152 - (4-6.4): Reject
SUBMITTER: Lyle Beard, Seal Rock Rural Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: ~~Shall~~ should
Does this mean the first three people on scene can do nothing until more help (that might be one-2 hours away) gets there?
SUBSTANTIATION: Fire F. and EMS and Haz Mat personnel should never take undue risks, but also we should not be handcaped by rules or threat of litigation when we try to do our jobs - save lives & property.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The committee feels that the current text in 4.1.6 addresses the submitters comment.

(Log #1)

1720-153 - (Chapter 5): Reject
SUBMITTER: Pete Holtman, Pierce County Fire District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete all of Chapter 5 in regard to staffing of minimum four-person engine companies and to tactical hazards where there will be a requirement of five or six persons per engine (Chapter 5.2.2.1.1)
SUBSTANTIATION: None.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The submitters comment was rejected because there is no reference in this standard to Chapter 5 in the proposed NFPA 1710, Standard for the Organization and Deployment of Fire Suppression, Emergency Medical Operations and Special Operations to the Public by Career Fire Departments.

(Log #9)

1720-154 - (Chapter 5): Reject
SUBMITTER: Victor Rasmussen, Clark County Fire District #9
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete ~~NFPA 1710~~ in its entirety.
Delete ~~Chapter 5.2.3.1.1~~ in NFPA 1710.
Delete all of Chapter 5 in regard to staffing. (minimum 4/engine) (~~Chapter 5.2.2.1.1~~)
Delete all of ~~Chapter 5 (NFPA 1710)~~
SUBSTANTIATION: NFPA 1710 is not in the best interests of the local fire departments.
NFPA 1710-1720 is not financially feasible or realistic for non-metro fire departments and districts.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-153 (Log #1).

(Log #10)

1720-155 - (Chapter 5): Reject
SUBMITTER: Gary L. Larson, Clark County Fire District #9
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete ~~NFPA 1710~~ in its entirety.
Delete ~~Chapter 5.2.3.1.1~~ in NFPA 1710.
Delete all of Chapter 5 in regard to staffing. (minimum 4/engine) (~~Chapter 5.2.2.1.1~~)
Delete all of ~~Chapter 5 (NFPA 1710)~~
SUBSTANTIATION: NFPA 1710 is not in the best interests of the local fire departments.
NFPA 1710-1720 is not financially feasible or realistic for non-metro fire departments and districts.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-153 (Log #1).

NFPA 1720 — May 2001 ROC — Copyright 2001, NFPA

(Log #11)

1720- 156 - (Chapter 5): Reject
SUBMITTER: John Straub, Clark County Fire District #9
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete NFPA 1710 in its entirety.
Delete Chapter 5.2.3.1.1 in NFPA 1710.
Delete all of Chapter 5 in regard to staffing. (minimum 4/engine) (Chapter 5.2.2.1.1)
Delete all of Chapter 5 (NFPA 1710)
SUBSTANTIATION: NFPA 1710 is not in the best interests of the local fire departments.
NFPA 1710-1720 is not financially feasible or realistic for non-metro fire departments and districts.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-153 (Log #1).

(Log #65)

1720- 157 - (Chapter 5): Reject
SUBMITTER: Dwight James, Rochester, WA
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete Chapter 5 NFPA 1710.
SUBSTANTIATION: Chapter 5 NFPA 1710 is not attainable for volunteer rural fire district financially it is not feasible. The taxpayers are to the limits in our state and to ask for more is out of the question. Rewrite the standards so they pertain to different situations reasonably and responsibly.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-153(Log #1).

(Log #62)

1720- 158 - (5-1): Reject
SUBMITTER: Fred C. Windisch, Harris County Fire & Rescue
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
"The fire department shall identify the most appropriate compliance with NFPA 1500 and have a long range plan to comply within the capabilities of the community."
SUBSTANTIATION: Small communities do not have the resources to comply with all NFPA 1500 requirements.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The NFPA 1500, Standard on Fire Department Occupational Safety and Health Program, allows for and specifies an implementation plan that includes input from the fire department and the authority having jurisdiction.

(Log #67)

1720- 159 - (5-2.2.1.1): Reject
SUBMITTER: Dwight James, Rochester, WA
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete four minute response time requirement in 1710.
Delete minimum staffing requirement of four-person engine companies and five or six person companies for tactical hazards.
SUBSTANTIATION: Here in the west, our volunteer fire fighters have to take the engine and the tender to most of our fires. We often can only muster 2 or 3 volunteers to get the equipment to the calls, while others trickle in, in their own vehicles. We have been getting the job done for over 50 years.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #183)

1720- 160 - (5-2.2.1.1 and 5.2.3.1.1): Reject
SUBMITTER: Richard L. Anderson, Lewis County Fire District #5
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete all of Chapter 5 of NFPA proposed standard of 1710.

SUBSTANTIATION: The proposed standard of 1710 and 1720 would prevent our fire district from responding to any medical and fire responses due to lack of manpower. This would require a great sum of money which we are prohibited from collecting account of tax laws.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See committee statement on Comment 1720-161 (Log#2).

(Log #2)

1720- 161 - (5-2.3.1.1): Reject
SUBMITTER: Pete Holtman, Pierce County Fire District 8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete the four-minute response time requirement in 1710 (delete Chapter 5.2.3.1.1)
SUBSTANTIATION: None.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The submitters comment is germane to NFPA 1710, Standard for the Organization and Deployment of Fire Suppression, Emergency Medical Operations and Special Operations to the Public by Career Fire Departments, and not this standard.

(Log #28)

1720- 162 - (5-2.3.1.1): Reject
SUBMITTER: Reggie Romines, Pierce County Fire District #21
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: 1. Delete 1710 in its entirety as it is not in the best interests of the local fire departments.
2. Delete the four-minute response time requirement in 1710 (delete Chapter 5.2.3.1.1).
3. Delete all of Chapter 5 in regard to staffing of minimum four-person engine companies and to tactical hazards where there will be a requirement of five or six persons per engine (Chapter 5.2.2.1.1).
4. Delete all of Chapter 5 (NFPA 1710) in regard to deployment and staffing. It is neither financially feasible nor realistic for non-metro fire departments and districts.
SUBSTANTIATION: None.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #66)

1720- 163 - (5-2.3.1.1): Reject
SUBMITTER: Dwight James, Rochester, WA
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete four minute response time requirement.
SUBSTANTIATION: The committee must consider the volunteer organizations structure. Our district is 36 sq. miles. A fire fighter lives 4 miles east of the station the fire is 4 miles east of the station. If the fire fighter is dressed and ready to go it will take at least 5 1/2 minutes to get to the station and roll to the scene. This element must be considered when formulating this document.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #25)

1720- 164 - (5-2.3.1.1, 5-2.2.4): Reject
SUBMITTER: Brian Richardson, Clallan County Fire District #5
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete 1710 in its entirety.
Delete the four minute response time requirement in 1710.
Delete Chapter (5.2.3.1.1).
Delete all of Chapter 5 in regard to minimum four person engine companies and to tactical hazards when there will be a requirement of fire or six persons per engine.
Delete all of Chapter 5 (NFPA 1710 in regard to deployment and staffing.

SUBSTANTIATION: Small communities who rely solely on volunteer fire companies struggle to maintain adequate personnel such stringent requirements will increase response time and may make volunteer fire departments even less desirable to potential recruits. Seventeen years in the fire service has shown me people value their time more than anything. The standard should address to what competency level a firefighter should achieve not response.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #161)

1720- 165 - (5-2.3.1.1 and 5-2.2.1.1): Reject
SUBMITTER: Richard H. Leighty, Grays Harbor Fire District #8
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete 1710 in its entirety as it is not in the best interest.

Delete the 4 minute response time.
Delete all of Chapter 5 in regard to staffing a minimum 4 person engine and to tactical hazards where a requirement of 5-6 persons per engine.

Delete all Chapter 5 (1710) in regard to deployment and staffing. It is not financially feasible not realistic for volunteer fire departments and districts.

SUBSTANTIATION: Volunteer fire departments and districts respond from their residences, many times responding directly to the scene depending on closeness to the scene or to the trucks. It would cause a slower response if everyone went to the trucks first. At times also, volunteers, due to response locations 4 minutes is an unreasonable response time to get to the scene. Volunteers respond from their residences and job locations, not from a manned station.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #105)

1720- 166 - (5-4.2): Reject
SUBMITTER: Jon R. Brown, Willamette Valley Communications Center 911
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete this paragraph.
SUBSTANTIATION: Covered in NFPA 1221. NFPA 1221 is a recommended voluntary standard, this would be duplications.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #182)

1720- 167 - (5-4.2): Reject
SUBMITTER: Jon R. Brown, Willamette Valley Communications Center 911
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
"All communications facilities, equipment staffing and operating procedures shall should comply with NFPA 1221."
SUBSTANTIATION: Based on explanatory material in A.5.4, this is a recommendation not mandatory. Therefore "should" should be used with a ° for explanation under 3.2.4.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The standard requires the use of mandatory text., and as it references NFPA 1221 which is a standard permissive text is not allowed.

(Log #106)

1720- 168 - (5-4.3): Reject
SUBMITTER: Jon R. Brown, Willamette Valley Communications Center 911
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete this paragraph.
SUBSTANTIATION: Covered in NFPA 1221. NFPA 1221 is a recommended voluntary standard, this would be duplications.

COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #107)

1720- 169 - (5-4.3.1): Reject
SUBMITTER: Jon R. Brown, Willamette Valley Communications Center 911
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Delete this paragraph.
SUBSTANTIATION: Covered in NFPA 1221. NFPA 1221 is a recommended voluntary standard, this would be duplications.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-161 (Log #2).

(Log #63)

1720- 170 - (5-5): Accept
SUBMITTER: Fred C. Windisch, Harris County Fire & Rescue Center 911
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise text to read as follows:
Original: Fire department shall pre-plan all target hazards
Proposed: Fire department pre-plan the target hazards within their community.
SUBSTANTIATION: "All" is not definable nor achievable.
COMMITTEE ACTION: Accept.

(Log #170)

1720- 171 - (5-5): Reject
SUBMITTER: Lyle Beard, Seal Rock Rural Fire Protection District
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: The fire department shall should set forth operational requirements to conduct pre-incident planning on special hazards and commercial buildings and do typical plans of common types of residential situations. Particular attention should—shall be provided to all target hazards.
SUBSTANTIATION: Manpower problems, and infringement on peoples rights prevent doing preplans on all homes. Commercial buildings and special hazards are doable. Plans for "typical" residences of different types and layouts are a must, but each individual buildings is not.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: See Committee Statement on Comment 1720-134 (Log #83).

(Log #137)

1720- 172 - (A-2-3.1.1): Reject
SUBMITTER: K.G. Sim, Winnipeg Emergency Response Service
COMMENT ON PROPOSAL NO: 1720-259
RECOMMENDATION: Revise A-2-3.1.1 second sentence to read as follows:
"Normally, on the first alarm response, the first engine company and ~~truck company~~ respond directly to the front of an emergency..."
SUBSTANTIATION: Few volunteer companies in Canada include a 'truck' response, especially as a first alarm response. Recommendation more accurately represents usual response configuration.
COMMITTEE ACTION: Reject.
COMMITTEE STATEMENT: The submitters comment is germane to NFPA 1710, and not this standard.