

NATIONAL FIRE PROTECTION ASSOCIATION

STANDARDS COUNCIL MEETING

ITEM NO.: 16-4-14-d

DATE TAKEN: April 6, 2016

TIME: 9:04 a.m. to 10:06 a.m.

PLACE TAKEN: Hyatt Regency Coconut Point
4001 Coconut Road
Bonita Springs, FL 34134

Stenographically Reported By:

Rebecca L. Crane, RPR, FPR
U.S. Legal Support, Inc.

STANDARDS COUNCIL MEMBERS PRESENT

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James R. Quiter, Acting Chair

Kerry Bell

Chad Beebe

Randall Bradley

Kenneth Bush

Richard Owen

Patricia Gleason

James Golinveaux

Bonnie Manley

Gary Keith

Daniel O'Connor

John Rickard

Dawn Bellis, Secretary

Linda Fuller, Recording Secretary

ATTENDING

1
2 Sally Everett, Counsel for Standards Council

3 Christian Dubay, NFPA Staff

4 Mark Fisher, Counsel for OMNI EMP

5 Youngki Chung, CEO of OMNI LPS

6 Beth Gilson, Counsel for East Coast Lighting

7 John Tobias, Chairperson of 780 Committee

8 Mitchell Guthrie, Member of NFPA 780,
9 Chairman of IEC TC 81

10 Bruce Kaiser, Lightning Master Corporation

11 Steve Humeniuk, Warren Lightning Rod Company,
12 Member of NFPA 780 and IEC TC 81

13 Lance Fleming, Lightning Protection Systems

14 Jack Albertine, OMNI EMP

15 George Portfleet, Michigan Lightning Protection,
16 Member NFPA 780

17 Dong Jin Kwon, Korean Electric and Power Corporation

18 Julie Choi, OMNI LPS

19 Guy Maxwell, Maxwell Lightning Protection of Florida

20 Mark Morgan, East Coast Lightning Equipment,
21 Member of 780 Technical Committee

22 Patrick Dillon, Bonded Lightning Protection,

23 Jeff Harger, HLP Systems

24 Tyler Baumer, A/C Lightning Protection

25 Philip Youtsey, Guardian Equipment,
Member of the NFPA 780 standards

Dewayne Thames, Lightning Masters

1 MR. BELL: Good morning, everyone. I call
2 this hearing to order. My name is Kerry Bell. I'm
3 the chair of the Standards Council.

4 The hearing that we have this morning here is
5 related to agenda item 16-4-14-d, regarding an
6 appeal on NFPA 780.

7 In a moment, I'm going to go around the room
8 here and ask everyone to introduce themselves.
9 Before I do that, I just want to point out that we
10 do have a stenotypist in the room here with us this
11 morning that's going to be recording today's
12 session. So for those of you who are about to be
13 speaking, it's important for you to remember to
14 state your name prior to making your remarks so
15 that we can capture that for the record.

16 So with that, let's get started with the
17 introductions. And I ask that you state your name
18 and your affiliation. And I'll start here to my
19 left.

20 MS. EVERETT: Sally Everett, NFPA staff and
21 legal counsel for the Standards Council.

22 MR. DUBAY: Christian Dubay, NFPA staff.

23 MR. RICKARD: John Rickard, member of council.

24 MR. O'CONNOR: Dan O'Connor, member of
25 council.

1 MR. QUITER: Jim Quiter, member of council.

2 MR. GOLINVEAUX: James Golinveaux, member of
3 council.

4 MS. GLEASON: Patricia Gleason, member of
5 council.

6 MS. MANLEY: Bonnie Manley, member of council.

7 MR. BEEBE: Chad Beebe, member of council.

8 MR. BRADLEY: Randall Bradley, member of
9 council.

10 MR. BUSH: Kenneth Bush, member of council.

11 MR. OWEN: Richard Owen, member of council.

12 For the record, I am recusing myself on this agenda
13 item. I will not participate as a member of the
14 Standards Council in the hearing, deliberations, or
15 voting on this matter.

16 MR. KEITH: Gary Keith, member of council.

17 DR. CHUNG: Youngki Chung, CEO, OMNI LPS, from
18 Korea.

19 MR. FISHER: Mark Fisher, counsel, OMNI EMP.

20 MS. GILSON: Beth Gilson. I'm counsel for
21 East Coast Lightning Equipment.

22 DR. TOBIAS: Good morning. I'm John Tobias,
23 chairperson of the 780 Committee.

24 MR. GUTHRIE: Good morning. I'm Mitchell
25 Guthrie, member of NFPA 780, as well as the

1 chairman of IEC TC 81.

2 MR. KAISER: Bruce Kaiser, chairman of
3 Lightning Master Corporation.

4 MR. HUMENIUK: Steve Humeniuk, I'm president
5 of the Warren Lightning Rod Company. I'm a member
6 of NFPA 780 and of IEC TC 81.

7 MR. FLEMING: Lance Fleming, owner Lightning
8 Protection Systems, Naples, Florida.

9 DR. ALBERTINE: Jack Albertine, chairman of
10 OMNI EMP, USA.

11 MR. PORTFLEET: George Portfleet, Michigan
12 Lightning Protection, member NFPA 780.

13 DR. KWON: Dong Jin Kwon from Korean Electric
14 and Power Corporation.

15 MS. CHOI: Julie Choi from OMNI LPS, Korea.

16 MR. MAXWELL: Guy Maxwell, Maxwell Lightning
17 Protection of Florida.

18 MR. MORGAN: Mark Morgan from East Coast
19 Lightning Equipment, also member of 780 Technical
20 Committee.

21 MR. DILLON: Patrick Dillon, Bonded Lightning
22 Protection, Jupiter, Florida.

23 MR. HARGER: Jeff Harger, HLP Systems,
24 Libertyville, Illinois.

25 MR. BAUMER: Tyler Baumer, A/C Lightning

1 Protection.

2 MR. YOUTSEY: Philip Youtsey, Guardian
3 Equipment, from Michigan, also a member of the NFPA
4 780 Standards.

5 MR. THAMES: Dewayne Thames, Lightning
6 Masters, research and development.

7 MR. BELL: Well, thank you, everyone. Now
8 that we -- have we got one more? Oh, I'm sorry.

9 MS. FULLER: Linda Fuller, NFPA staff.

10 MS. BELLIS: Dawn Michelle Bellis, NFPA staff.

11 MR. BELL: Sorry about that. Should've gone
12 around the table.

13 MS. GILSON: Well, you have name tags so --

14 MR. BELL: Now that we've got everybody on the
15 record, I'm going to recuse myself on this hearing
16 and not participate in the deliberations or voting
17 on this matter. And I've asked Council Member
18 Quiter to chair this session, so at this point I'm
19 going to turn the floor over to him.

20 MR. QUITER: Thank you, Mr. Bell.

21 So I want to remind a bit of the procedure.
22 Each side will have a collective ten minutes to
23 make their opening statements, beginning with the
24 appellant; the council will then have as much time
25 as necessary to ask questions of either side; and

1 then to conclude, each side will have five minutes
2 to make a closing statement. And, again, it's a
3 collective five minutes.

4 I want to remind you that this is an appeal to
5 the Standards Council, and therefore the appeal
6 should primarily be describing the procedure, not
7 the technology, because we are not here to make
8 technical decisions.

9 When we get to the question and answer
10 session, I will ask people to just please speak
11 through me and -- to be recognized, so that we can
12 keep control of what's going on.

13 As you speak, because there are several people
14 talking, when you get close to time, I will remind
15 you. We do want to stick to our time commitments,
16 and, therefore, I ask you to respect that time
17 limit as well. With that, we will start with the
18 appellant.

19 I understand, Mr. Fisher, you prefer to speak
20 first.

21 MR. FISHER: Dr. Chung will make some opening
22 comments, and then I will speak.

23 DR. CHUNG: Good morning to you, ladies and
24 gentlemen. I am Youngki Chung, CEO of OMNI LPS
25 Korea.

1 First of all, I truly appreciate NFPA giving
2 me an opportunity to speak today. Right now, I
3 would like to tell you about my vision in the
4 United states. Now I am planning to set up the
5 factory for BCAT production base and R&D center,
6 and also the construction high voltage engineering
7 in the United States.

8 (Inaudible.) Now, high voltage engineering
9 (inaudible.)

10 THE REPORTER: I'm sorry. I'm just not
11 understanding him.

12 MS. FULLER: Just do the best you can.

13 DR. CHUNG: (Inaudible) in the cooperation
14 with the University of Florida. (Inaudible)
15 university. Along with that, I will establish
16 outdoor testing center for lightning protection
17 system in Florida. If it -- would be grateful if
18 you give me a chance to realize the vision here in
19 Florida.

20 So as you know, International Trade Safety
21 Force -- we have (inaudible) we try to raise one or
22 two possibilities of safety (inaudible) with
23 (inaudible) amounts of money, each of the money and
24 the old technology (inaudible) into technology.
25 (Inaudible) only one or two (inaudible) increasing.

1 Some electrons (inaudible) my system.

2 As the frequency and the intensity --
3 intensity is increasing due to global warming. Now
4 I am introduced my teams working this project for
5 three -- Dr. Albertine, and I (inaudible) explorer
6 in economy who was chairman of the (inaudible)
7 industrial (inaudible) and the (inaudible) special
8 re -- international (inaudible) issue. He has been
9 select as one of the best lawyer in the Washington
10 D.C. for 30 years. He's one (inaudible) often
11 Japanese rise market in (inaudible). So next
12 speak.

13 MR. FISHER: Yes. Thank you.

14 My comments will pick up on what Dr. Chung has
15 said. I want to address five issues.

16 First of all, what did we propose in the
17 Tentative Interim Amendment, the TIA to the NFPA
18 780 standard dealing with lightning protection
19 systems. Two, what was the rationale for what we
20 proposed. Three what happened in the NFPA 780
21 technical committee. Four, what is the correct
22 next step here going forward. Because that's
23 really the issue this morning, what is the path
24 forward. And a path forward needs to be set up
25 that will allow the OMNI LPS system to immediately

1 enter the US marketplace. And five, what steps
2 will OMNI LPS take if no corrective action is taken
3 by the Standards Council.

4 First of all, in the Tentative Interim
5 Amendment, the amendment's very simple. It was
6 drafted in conjunction with the staff of NFPA,
7 including the chief engineer of NFPA, Christian
8 Dubay, who is here this morning, and Dawn Michelle
9 Bellis, secretary of the NFPA Standards Council.
10 Indeed, we used their suggested wording from prior
11 NFPA equivalency amendments.

12 In a nutshell, the TIA simply stated a rule
13 equivalence; that is, that nothing in the NFPA 780
14 standard should be intended to prevent the use of
15 systems, methods, or devices of equivalent or
16 superior quality strength, fire resistance,
17 effectiveness, durability, and safety over those
18 prescribed by the NFPA 780 standard, which
19 currently covers only the installation of the
20 Franklin lightning rod. It was a nifty device when
21 it was invented 260 years ago, but not at all state
22 of the art, in terms of lightning protection.

23 It also provided that technical documentation
24 should be submitted to the authority having
25 jurisdiction, demonstrating equivalency based on

1 history of performance in the field. In other
2 words, it was -- already been used safely in the
3 field. The result of TIA would be that the
4 authority having jurisdiction should recognize the
5 equivalent technology as being in compliance with
6 NFPA 780.

7 We were informed by both Miss Bellis and
8 Mr. Dubay that there was ample precedent for this
9 kind of amendment and that a rule of equivalence
10 has been adopted four or five times in the past by
11 NFPA. So this is not a new thing.

12 So just back up for a moment and think about
13 what we proposed. What we proposed was that if you
14 have a lightning protection system that meets or
15 exceeds the current standards of NFPA 780, Franklin
16 rod, and that you submitted the documentation to
17 the authority having jurisdiction, and that you
18 provided records with regard to safe installations,
19 then that lightning protection system should be
20 deemed to be in compliance with NFPA 780. What
21 could possibly be wrong with that? So that's what
22 we proposed. It's very important to remember how
23 this all started.

24 What's the rationale? Well, we had three
25 rationales for the TIA. The first is that the OMNI

1 LPS system works. Dr. Chung has had over 9,000
2 installations in South Korea of the OMNI LPS
3 system. The technology is the standard lightning
4 protection system that's been used in South Korea
5 over the last ten years. It is protecting the blue
6 house, which is their equivalent of the white
7 house. It is protecting their iconic religious
8 shrines, dams, infrastructure, military
9 installations, missile systems, and the most
10 important buildings in South Korea.

11 So as Dr. Chung mentioned, very importantly
12 and crucial to our case, is that this system has
13 been tested by Samsung Electronics. They've
14 conducted indoor and outdoor tests for the past
15 nine years on the system, and they found that the
16 bipolar conventional air terminal reduces the
17 probability of a lightning strike by approximately
18 45 percent. He was talking 1 or 2 percent.

19 Samsung --

20 MR. QUITER: You've got about three minutes
21 left, so you might want to move along.

22 MR. FISHER: So the point is that Samsung has
23 already moved to adopt this bipolar conventional
24 air terminal on the basis of safety, which should
25 be the lodestar of what this committee worries

1 about.

2 So the second rationale for the adoption of
3 the TIA at the time was the scientific studies
4 already in place. Dr. Chung and his colleagues
5 have produced four IEEE studies documenting the
6 efficacy of the corona discharge system.

7 It's incumbent on those who oppose this to
8 come forward with scientific evidence on the other
9 side, which they have not done.

10 Interestingly, Dr. Abdul Mousa from Canada and
11 Dr. Petersen of Denmark have entered into a very
12 respectful scientific dialogue with Dr. Chung about
13 how to make the OMNI LPS system be in compliance
14 with the NFPA 780 standard. And in their
15 comments -- Dr. Mousa said that with a few tweaks,
16 we could be under the standard.

17 And in fact, Mitchell Guthrie, who I'm glad to
18 see is here this morning, in comments to the NFPA
19 780 Technical Committee, said the same thing. He
20 said the problem is the perception in the
21 marketplace, that it's not in conformance with NFPA
22 780.

23 The third rationale for the TIA is that the
24 current system -- if you don't change it, you're
25 violating US and international trade law, which

1 under the WTO requires that you not have
2 unnecessary obstacles to trade, that standards not
3 be used to be obstacles of trade.

4 And of course the process point is really
5 crucial here. You have rejected the OMNI LPS
6 system based by a committee of competitors. East
7 Coast Lightning, right to my left, among them. And
8 that is very unfair when you have an unbalanced
9 system that is dominated by competitors,
10 precluding, violates the US Sherman Act and
11 antitrust laws.

12 Well, what will we do if we're not successful?
13 We will pursue our legal remedies. We have to do
14 what we have to do. You know, but I would just say
15 that the Standards Council should focus on the
16 safety issue. I mean, it's not just about OMNI
17 LPS; this is about the safety of the American
18 people. And, you know, we're not here just to
19 prove a point, but we're here to have a safer
20 nation. Thank you.

21 MR. QUITER: Thank you. And thanks for
22 honoring the time commitment.

23 I understand, Miss Gilson, you'll be starting?

24 MS. GILSON: Yes. Could you kindly give me a
25 two-minute warning? And then I'll go on for three,

1 so that we can share our time. Can you do that?

2 MR. QUITER: You want to know --

3 MS. GILSON: Two minutes.

4 MR. QUITER: -- after two minutes?

5 MS. GILSON: Yes.

6 I think despite the effusive praise of this
7 product and the threats to the Standards Council,
8 none of what counsel has said is before you today.

9 This issue may be new to you about nonstandard
10 lightning equipment, but it's not new to the
11 Standards Council or the NFPA. Mark, my Vanna
12 White here, has prepared -- this is the history of
13 the NFPA's consideration and rejection of
14 nonstandard, unproven lightning products. And the
15 only rule that the NFPA has put together is there
16 will be no standards inclusion, unless you have
17 independent scientific, technical justification for
18 the product. That said, we're not here to talk
19 about that.

20 We're here to talk about the fact that the
21 rule for the NFPA in -- the Standards Council, in
22 approving or denying an appeal from the denial of
23 the TIA, is only two things. Did the committee
24 vote for or against the technical merit; and did
25 the committee vote that there is an emergency. The

1 answer is a resounding no by 23 to four the
2 committee, after due consideration and a comment
3 period, voted no, there was no technical merit to
4 include this gadget in the standard, and that there
5 was no emergency. Even if it had failed one prong,
6 that was -- that's enough.

7 And the Standards Council itself has
8 generally, after looking at your own rules, it's --
9 you defer to the Technical Committee unless -- we
10 have two experts here to talk about or answer your
11 questions as to the makeup of the Technical
12 Committee. As long as they took the vote and voted
13 against it, your job is only to uphold that
14 decision.

15 I can talk a lot more about this. We've had
16 years and years and years before you. I think
17 Mr. Bell knows some of the history of this. And,
18 basically, they submitted no timely technical
19 information and provided no reason why there's an
20 emergency, and there should be no reason why the --
21 your Technical Committee's decision should not be
22 honored.

23 And they can bring this back through the
24 normal standard process. Every -- the 780 is like
25 most of the codes and standards with the NFPA, it

1 tells how you can properly have a building send
2 lightning safely to the ground. That's all it is.
3 It's a system of wires and cables. There's no
4 magic.

5 MR. QUITER: That's your two minutes.

6 MS. GILSON: Okay. I'm going to go a little
7 bit further. That just -- well, actually, I think
8 we've said it all. Here the answer is, yes, it
9 failed both prongs of the test, and we urge you to
10 deny this untimely appeal.

11 DR. TOBIAS: Good morning. I'm John Tobias,
12 chair of the NFPA 780 Committee. Thank you for the
13 opportunity to speak today.

14 As committee chair, I'd like to point out, as
15 was said already, the ballot for the TIA was done
16 in strict accordance with the NFPA regulations,
17 with public comment, considered by the individual
18 committee members voting on the ballot.

19 Despite any say to the contrary, to prevent
20 any kind of undue influence, the committee is
21 well-balanced between users, enforcers,
22 manufacturers, and experts. In fact, majority of
23 the manufacturers represented on NFPA 780, in fact,
24 sell alternative lightning protection systems.
25 Five out of seven, I believe, is the number.

1 To continue, I want to synopsise the committee
2 comments returned with the ballot with the comments
3 of the public. And in formulating a negative vote,
4 there's three major points for the TIA. And I
5 remind that the TIA has absolutely nothing to do
6 with technology, but rather provides what's
7 tantamount to a waiver of the specific items in the
8 NFPA 780 standard.

9 Proposed TIA suggests that an AHJ -- or I
10 should say the contention of the appellants is that
11 the -- there's some constraint to use NFPA 780 in
12 the application of lightning protection systems,
13 which is completely false. The NFPA 780 standard
14 presents guidance for the installation of
15 conventional lightning protection systems, nothing
16 more. There's no NFPA regulations, standard code,
17 guide, et cetera, that mandates the use of 780, or,
18 for that matter, mandates installation of lightning
19 protection at all.

20 As such, any AHJ project, owner, designer,
21 whatever, can select whatever standard or method
22 they prefer for lightning protection. It's
23 well-known that there are other standards, like the
24 UL 96A and the IEC 63205 series and so on.

25 Any contention that the government reads 780

1 as a defective requirement is false. This has been
2 expressed by government representatives in their
3 comment on the ballot. It's also proved false by
4 the advertised clientele of the company selling
5 alternate lightning protection systems and by
6 personal experience.

7 When I got the call about this meeting, I was
8 sitting on Kirtland Air Force Base, looking at an
9 alternative lightning protection system that did
10 not comply with NFPA 780. As such, I maintain that
11 there's no restriction, limitation, or constraint,
12 or is it evidenced in any way, that the NFPA 780
13 standard constrains one to use that form of
14 lightning protection or, again, any lightning
15 protection at all.

16 Second, committee members and the public point
17 out that the TIA circumvents meticulous structured
18 NFPA standards process, of which you're all well
19 aware. Judgment of equivalency of a system does --
20 NFPA 780, under the method proposed at TIA, is
21 removed from any panel of experts with the
22 oversight of this process and the oversight of the
23 public, through public comment in the standards
24 development process, to possibly one person who may
25 or may not be an expert in matters of lightning

1 protection.

2 Third, the TIA assigns false approval powers
3 to the NFPA. The language in it -- or I should say
4 false approval powers that NFPA doesn't claim to
5 have, and then delegates these powers to an AHJ,
6 over which NFPA has no control. It assigns an
7 unlimited approval authority to NFPA for other
8 organizations, to include UL and ANSI.

9 As far as I know, a statement in NFPA standard
10 can't govern the other standards or other
11 organizations, policies, or approval powers or so
12 on and such.

13 Review of the committee positions, amplified
14 by several public comments on proposed TIA, call
15 for maintaining its rejection as the committee
16 ballot indicated.

17 For all the reasons I stated, it should be
18 rejected, as well as many others we have no time to
19 discuss today. There's no merit for this
20 equivalency clause, nor is there an emergency that
21 requires a TIA.

22 My experience of the past 20 years, serving on
23 the committee, is that all positions, proposals,
24 and comments submitted through the regular NFPA
25 process -- which none have been for this matter --

1 have been addressed fairly and seriously within the
2 govern -- the regulations governing NFPA
3 committees.

4 MR. QUITER: We have about two minutes left,
5 if you're going to get to your third speaker.

6 DR. TOBIAS: The committee would certainly
7 consider a technical proposal from the appellant,
8 submitted with the normal NFPA 780 cycle, in the
9 same fashion of fairness and serious deliberation.
10 Thank you. Sorry.

11 MR. GUTHRIE: Thank you. You said two
12 minutes, so I'll make it.

13 First of all, I just want to speak
14 specifically to the TIA. First, the existing text
15 is unenforceable. It contains style manual issues
16 that cannot be accepted as written in NFPA
17 regulations.

18 Second, the approval of the TIA would go
19 against previous Standards Council rulings. A
20 major issue is that the proposed TIA addresses both
21 components and systems. That's important because
22 Counsel Fisher mentioned that NFPA has had, in the
23 past, or continues to have, some equivalent
24 statements on components but not systems. Systems
25 are much more difficult to assess the equivalency

1 of.

2 We have been able [sic] to identify any
3 similar equivalency statement in any lightning
4 protection system standard in the entire word.
5 This would be unique. The determination of
6 equivalency is not a trivial exercise and cannot be
7 performed by most HAJs. That's why they go to
8 standards such as NFPA 780.

9 CENELEC proposed -- established a pure
10 performance standard task force in order to perform
11 such a function, and they were unable to accomplish
12 the task. Again, these are subject matter experts
13 that were unable to perform the functions that
14 we're asking the HAJs to do.

15 Lastly, to speak to the emergency nature, the
16 justification of the 780 results in undue risk,
17 contains misstatements as to the way the IEC and
18 CENELEC standards handled streamer-influenced
19 technology. 780 is the implementing standard for
20 NFPA -- excuse me, for IEC 62305. And as such, is
21 very -- is substantially similar. The --

22 MR. QUITER: Time is up.

23 MR. GUTHRIE: Okay.

24 MR. QUITER: Okay. And I didn't -- you didn't
25 identify yourself.

1 MR. GUTHRIE: Oh, I'm sorry. Mitchell
2 Guthrie.

3 MR. QUITER: Okay. Thank you.

4 So we're going to open this up to questions
5 from the Standards Council. And direct them,
6 again, through me.

7 MR. GOLINVEAUX: For the appellant. You made
8 a comment in your statement that this was an
9 unbalanced committee, and I'd like to hear your
10 rationale or your justification of why you think
11 that this committee is unbalanced in accordance
12 with the ANSI process that we follow.

13 MR. FISHER: Well, for starters, you have no
14 Korean representatives for the foreign interest
15 that's involved. You have competitors who have a
16 vested interest, like East Coast Lightning, in the
17 conventional Franklin rod technology. And the
18 competitors are dominant on the committee, and the
19 competitors have a vested, narrow commercial
20 interest to reject anything other than the Franklin
21 rod as coming under NFPA 780. NFPA 780 expressly
22 has a clause in there precluding alternative
23 systems.

24 MR. GOLINVEAUX: Okay. I just wanted --

25 MR. FISHER: So, I mean, the competitors are

1 dominating the committee.

2 MR. GOLINVEAUX: I just wanted your opinion on
3 the balance issues. Thank you.

4 MR. FISHER: Yes. Which violates the ANSI
5 procedures, by the way, for formulating standards.

6 MR. QUITER: Other questions?

7 MS. GLEASON: I would just like to ask a
8 question of the other side, particularly the
9 chairman of the Technical Committee, because I -- I
10 had the same note and was concerned that the
11 Technical Committee is biased by competitors, and
12 I'd like to hear, as chairman of the committee,
13 your response to that.

14 DR. TOBIAS: Sure.

15 MR. QUITER: Before you answer, again, we
16 should -- even council members should be
17 identifying themselves.

18 MS. GLEASON: Patricia Gleason, council
19 member.

20 DR. TOBIAS: John Tobias, 780 chair.

21 Within the manufacturers and installers on the
22 committee, they all compete with each other,
23 naturally, because even if they're selling the same
24 product or other products, they all compete with
25 each other. So -- but, again, putting that aside,

1 they managed to come together and have technical
2 discussions and so on.

3 As I pointed out, of what I counted as seven
4 manufacturers, five of them sell an alternative
5 lightning protection system product. The thing to
6 remember is that, again, the reason why we don't
7 discuss alternative lightning protection systems,
8 NFPA 780, is simply because the scope precludes it.

9 Within the first few paragraphs of NFPA 780,
10 it says that the standards specifically precludes
11 nonconventional lightning protection systems.
12 Until that scope changes, we haven't seen the
13 technical proposal for an alternative system. So I
14 can't imagine why somebody would submit one, unless
15 it was a scope change of the document.

16 MR. QUITER: Other questions?

17 MR. O'CONNOR: Dan O'Connor, member of
18 council.

19 So I've looked through the TIA and the ballot
20 responses, and this question is for the appellant.
21 There are some -- there's quite a bit of detailed
22 and lengthy comments and responses for kind of
23 the -- what's called the negative votes on -- and
24 is there anything in the comments in those
25 ballots -- and I'm assuming you've seen all that

1 documentation -- that you believe is in conflict
2 with the NFPA process?

3 MR. FISHER: The comments by Dr. Abdul
4 Mousa are -- and he was submitting them as a public
5 commentator -- were very interesting in the sense
6 that he looked at the technology, and he had a
7 series of questions about it. The questions were
8 responded to, which on the efficacy issue I think
9 rebutted any concern about the safety and the
10 efficacy of BCAT.

11 Come to Mr. Tobias' point, though, that's the
12 whole point. The scope is wrong on NFPA 780. If
13 you just took out that one clause, saying you can't
14 cover other kind of systems under the NFPA 780,
15 this issue could be resolved.

16 And so what we're doing is we're going in a
17 circle here, because the scope is ration limited.
18 It's narrow. You've said, this is progress, this
19 is the Franklin rod. That's all we're going to
20 have -- that's all NFPA will have as the standard,
21 780. And that 780 is, for lightning protection,
22 just the Franklin rod.

23 Well, when other systems come on, you have to
24 have another way to address that. And right now,
25 Mr. Tobias is correct, there is no other way to

1 address it. So we're going in a circle until the
2 Standards Council takes prompt action on the whole
3 process. It's a circular process that leads
4 nowhere.

5 MR. QUITER: Identify yourself.

6 MS. GILSON: Beth Gilson, East Coast.

7 Our chairman -- we note that the Standards
8 Council itself set the scope of NFPA 780. And
9 counsel is ignorant of the long, long history of
10 nonstandard products attempting to either
11 circumvent 780 or get their own standard. And in
12 each case, the NFPA has excruciating hearings,
13 you've commissioned reports, you've commissioned --
14 did everything to ascertain whether this
15 technology, nonstandard technology, deserved a
16 standard, 781 back in 1995, and found that unless
17 there is independent technical information, it
18 should -- submitted -- and none was submitted
19 here -- and it goes through a process where --
20 which we were talking about -- it doesn't
21 circumvent what the -- emergency TIA, but an actual
22 going through the process, then they might look at
23 it.

24 But the scope itself was set by the Standards
25 Council, and the history, including litigation,

1 which we've had plenty of -- you might be familiar
2 with litigation against the NFPA on antitrust
3 grounds, on grounds of excluding nonstandard
4 devices. The NFPA settled out, after commissioning
5 a report and allowing the nonstandard people to
6 come back again, but we won the antitrust issue.
7 There was no antitrust violation at all in the
8 process of rejecting a standard for a nonstandard
9 device.

10 MR. QUITER: Mr. Fisher?

11 MR. FISHER: Could I make a comment?

12 MR. QUITER: Yes.

13 MR. FISHER: You know, I'm ignorant about a
14 lot of things, but I'm not ignorant about the
15 history of this issue and the ten-year history or
16 20-year history. And the difference here is that
17 Dr. Chung's technology, OMNI LPS system, is new,
18 original, and different from the prior systems that
19 were considered before. Charge transfer systems,
20 systems -- his corona discharge system is
21 different.

22 So how do we get into this marketplace?
23 That's really the question. We are not ignorant of
24 the history. The problem is that we're different
25 from the prior issues. And we did submit evidence

1 on the Samsung test. So we respectfully disagree
2 with that.

3 MS. GILSON: It's not timely.

4 MR. QUITER: Okay. Are there --

5 MR. FISHER: Well, they've got it now.

6 MR. QUITER: Hold on, hold on. Through me,
7 not to each other.

8 Mr. Golinveaux.

9 MR. GOLINVEAUX: James Golinveaux, member of
10 council.

11 And for the appellant, one other comment that
12 sort of resonated with me, and I just want to make
13 sure I clarify this on the record. You stated that
14 this language came from staff or a recommendation
15 from staff. And this language is not familiar to
16 me in any other document the way it's -- the way it
17 was written, so I'd like you to clarify for me --

18 MR. FISHER: Well, I'm very glad you asked
19 that question.

20 MR. QUITER: Excuse me a minute.

21 MR. FISHER: It goes to Mr. Guthrie's --

22 MR. QUITER: Excuse me a minute. He had not
23 finished his question.

24 MR. GOLINVEAUX: I would like you to clarify
25 for me that this language was either given to you

1 directly by staff or that you created some of this
2 language, just to clear up the record of where did
3 this language come from that was the proposed TIA.

4 MR. FISHER: Are you through?

5 MR. GOLINVEAUX: Yes.

6 MR. FISHER: So this isn't our first rodeo.

7 At the last Standards Council meeting, we met with
8 Christian Dubay. We discussed the issue, and he
9 said, in a subsequent phone conversation, "I see
10 what you're getting at. You're saying if you have
11 something that meets or exceeds the current
12 standard or is equivalent, then it should be
13 acceptable under an NFPA 780."

14 And I said, "That's exactly correct. That's
15 what we're saying."

16 And they said, "Let us show you the templates"
17 -- and the word used was templates -- "it's been
18 used before."

19 To come to Mr. Guthrie's point, on components
20 versus systems, the bipolar conventional air
21 terminal is a component.

22 MR. GOLINVEAUX: I only --

23 MR. FISHER: So there should be no reason --

24 MR. QUITER: Again, you're getting outside of
25 the scope.

1 MR. GOLINVEAUX: I'm asking just a direct
2 question on the text that you submitted.

3 MR. FISHER: So then we entered a process
4 between Dawn Michelle Bellis, Dubai, going over the
5 language, and some language was inserted later by
6 us that was not in the original staff report.

7 MR. GOLINVEAUX: Thank you. That is the
8 clarification I was looking for.

9 James Golinveaux, member of council.

10 MR. QUITER: And a reminder, there will be a
11 chance for closing arguments, so please just answer
12 the questions. And if you have things you want to
13 pick up at the end, then pick them up at the end.

14 Are there other questions? Bonnie?

15 MS. MANLEY: Thank you. Bonnie Manley, member
16 of council.

17 I'm curious to know in the international
18 installations, what's standard? Do you either
19 design or design and install this system to the
20 international --

21 DR. CHUNG: I answer to you. In Korea, okay,
22 sometimes (inaudible) can I speak English, can you
23 understand me okay.

24 In Korea 12 -- 12 years ago, we are received
25 full (inaudible) IEC 62035. Now it's (inaudible)

1 international (inaudible) only one Korea
2 (inaudible) standard, IEC standard. (Inaudible)
3 almost IEC system -- that's okay. And the rolling
4 spear (inaudible) that's okay. Only confront
5 (inaudible). Deductions is (inaudible). Almost
6 design concept philosophy same. International
7 (inaudible). Yes. Okay?

8 MR. QUITER: Dan?

9 MR. O'CONNOR: Dan O'Connor, member of
10 council.

11 I just wanted to follow up. Mr. Fisher, you
12 had said, you know, the technology is different,
13 it's new. But one thing I noticed in the TIA
14 rationale, it says in there -- and I quote -- the
15 suggested TIA would permit the products of
16 Lightning Master Corporation and Harry Brothers
17 Lightning Company to be iterated as equivalent.

18 So I -- is your equipment -- is your system
19 the same as theirs, or is it different?

20 MR. FISHER: No, it is different. But, again,
21 it's an alternative way that -- if OMNI LPS could
22 prove, under the equivalence, that it meets or
23 exceeds the current NFPA 780 standard, you should
24 let it be used or certified that it's used. That
25 gets into another issue, certification. But if

1 Lightning Master can also meet the test -- Bruce is
2 here -- then they should be able to be certified.
3 But that doesn't mean it's the same technology.

4 MR. QUITER: Thank you.

5 Chad?

6 MR. BEEBE: Chad Beebe, member of council.

7 In the documentation here, there's a statement
8 that talks about that the intention of the TIA was
9 to ensure that entities such as the US Government
10 do not withhold approval of this system. Have you
11 guys had an issue with a government authority not
12 approving this system?

13 MR. FISHER: Yes.

14 MR. BEEBE: And what government agency --

15 MR. FISHER: Department of Defense. And, in
16 fact, that's very interesting that you ask that
17 question. The Department of Defense sent back an
18 e-mail to us, which we're happy to provide the
19 committee, saying there is no way, no way we can
20 consider your technology, given the fact that NFPA
21 780 is adopted into the US Government standard.

22 That is also the case -- although we haven't
23 had a specific dialogue with GSA, but that's the
24 same situation with GSA, which is General Services
25 Administration, covering all federal buildings.

1 So the problem is that the federal government,
2 DOD -- we'll give you that evidence -- will not
3 look at the bipolar conventional air terminal
4 system, given the fact -- and this is a problem
5 generally, it's not just NFPA 780, but that --
6 these standards become incorporated into municipal
7 laws and indeed federal laws. So the answer is,
8 yes, we tried with DOD, we were told, "We don't
9 want to see you. Don't even darken our door, given
10 that we do NFPA 780."

11 MR. QUITER: Okay. Other questions? John?

12 MR. RICKARD: John Rickard, member of council.

13 This has been alluded to a couple times, so
14 I'm not sure who I want to answer this, maybe both
15 Mr. Tobias and Mr. Fisher.

16 780 is an installation standard, so I'm
17 wondering where the scoping is coming from as to
18 whether -- is that the only installation that can
19 be used or anything else -- and I guess I'll start
20 with Mr. Tobias.

21 Would you look at a product that's different,
22 that's beyond the scope of this -- that doesn't
23 mean that -- doesn't -- it's not covered by 780, it
24 doesn't mean that 780 says nothing else can be
25 used. How do you decide whether something that's

1 outside the scope would be an acceptable product?
2 Or do you rely on 780 to provide a scoping measure
3 as well?

4 DR. TOBIAS: Dr. John Tobias, 780 chair.

5 I'm going to answer your question as best as I
6 think I can. Again, I go back to the language of
7 the standards, NFPA doesn't approve anything, so on
8 and such. I think, though, that the operative
9 concept here is that -- there's a clause in 780
10 that basically says where components of the
11 lightning protection system can be listed, they'll
12 be listed to whatever appropriate standards. So
13 the one that's often looked to is in the UL series,
14 particularly UL 96, lightning protection component,
15 or 493, grounding components and so on.

16 UNIDENTIFIED SPEAKER: 467.

17 DR. TOBIAS: 467. Thank you. I'm confusing
18 terms.

19 So if they're listed for that, they're
20 generally considered acceptable for the lightning
21 protection application.

22 But one of the things that Mr. Fisher said
23 that I find very, very curious about this whole
24 thing, and really begs the question why are we here
25 at this point, and that is -- and in light of some

1 of the correspondence with Dr. Mousa that happened
2 after the submission deadline for the TIA and
3 everything.

4 I mean, if you can install what's really
5 tantamount to a hunk of metal, which we would call
6 a strike termination device, in accordance with
7 NFPA 780, assuming an inspector approves that
8 installation and the overall system described
9 within the 780 standard, I really don't see how it
10 would not get approved. So it really begs the
11 question, in my mind, why are we here. So --

12 MR. QUITER: Let me turn it back to
13 Mr. Rickard first, then I'll recognize you.

14 MR. RICKARD: Thank you.

15 So, Mr. Fisher, I guess the way I want to
16 think about this is that if -- you made a statement
17 that suggested to me that perhaps a separate
18 standard would be appropriate. I guess my question
19 is to you how would you go about talking to
20 whatever potential clients you might have about
21 convincing them that although it's not within the
22 scope of this document, it should have its own
23 scope and its own document and -- what kind of
24 textbook justification would you provide that your
25 product is -- although not within the scope of 780,

1 functions correctly in the way that you say that it
2 does?

3 MR. FISHER: Our preference is to have one
4 standard, the NFPA 780 standard, and to not have a
5 new 781 or a new standard. The reason is, just for
6 the question that was asked before, that the
7 federal procurement standard, they all talk about
8 NFPA 780, and they're inshrined in their lightning
9 protection, as the lightning protection standard.

10 So whether you have -- ideally, to draw it up,
11 you would have conventional and then -- which is
12 780A, and then alternatives, 780B, and then address
13 the OMNI system.

14 MR. RICKARD: Thank you.

15 MR. QUITER: I didn't allow you to answer
16 before. Go ahead.

17 MR. GUTHRIE: I just wanted to answer the
18 first question. Mitchell Guthrie.

19 In answer to your question about what can be
20 considered, the scope paragraph, 1.1.3,
21 specifically says that early streamer emission in
22 charge -- charge and dissipation systems are not
23 covered or is not covered by the standard.

24 So in answer to your question, any of the
25 other things, such as the -- a different grounding

1 system or a different technology, different areas,
2 can be covered, but we're limited by the scope.
3 And, again, this was provided to us by the
4 Standards Council, this wasn't something the
5 committee suggested.

6 MR. RICKARD: John Rickard, member of council.

7 So just one quick follow-up question on that.
8 Is it -- would you look at it as if it's not
9 included in the scope, that it's prohibited, or if
10 it's not included in the scope, then it would have
11 to be dealt with in another document or in some
12 other way? Mitchell, I'm asking you.

13 MR. GUTHRIE: Okay. Mitchell Guthrie.

14 I think it would be ambiguous perhaps, but I
15 would read that personally as it's not prohibited.
16 I mean, obviously if it doesn't say it shall not
17 cover. So it would allow other options to the
18 AHJs, for instance.

19 The way we handle this in the IEC is
20 specifically we say nothing. And by saying
21 nothing, that allows the national committees to
22 make the decision or the -- in our case, in the US,
23 the AHJs would be allowed to use -- you know, they
24 would have the flexibility to use those. It's not
25 specifically allowed, charge transfers, early

1 streamer emissions, are not specifically allowed in
2 the IEC standard, but there's no restrictions
3 against their use in the IEC standard.

4 And I think that's the -- to build on what
5 Dr. Tobias was saying is we're restricted by scope
6 from the Standards Council as to what we can
7 consider. And that's not to mean the standard
8 can't be applied because, as he said, there's a lot
9 of charge dissipation systems or charge transfer
10 systems that are being used in the US or a lot of
11 early streamer emission air terminals that are
12 being used in the United States.

13 I think my personal biggest point is the
14 wording of the TIA that talks about systems. When
15 you're talking about systems, you're also talking
16 about the number of down conductors, the grounding
17 electrodes, and the other things that are very
18 important. And I think it's very hard for an AHJ
19 to understand all of the other parameters.

20 If we're only dealing component to component
21 to component, then the amount of testing, the
22 amount of -- determination of equivalency is
23 limited because you don't have so many variables.

24 MR. RICKARD: Thank you.

25 DR. TOBIAS: May I amplify on that?

1 MR. QUITER: Yes.

2 DR. TOBIAS: John Tobias, chair, 780.

3 The fact that GSA, or any other government
4 entity, mandates 780 is no different than a bill
5 that writes a specification and invokes 780 or 70
6 or any other NFPA code or standard. And, in fact,
7 I will go so far as to say I know of one
8 installation under DOD auspices where BCAT is used
9 and installed in accordance with 780. The
10 installation is in South Korea and approved by the
11 Department of Defense.

12 MR. QUITER: Mr. Bush?

13 MR. BUSH: Kenneth Bush, member of council.

14 Probably just a question directed to the chair
15 of the Technical Committee. Are you aware of any
16 efforts to change the scope of 780, either by
17 public input, committee input, or any other way?

18 DR. TOBIAS: The last time that happened, that
19 was handed down -- the scope changed, that
20 currently exists, was promulgated by the Standards
21 Council on August 3rd, 1995, and to date I believe
22 that -- no, there's been no question about that.

23 MR. BUSH: Thank you.

24 MR. QUITER: Are there any final questions?

25 Sally?

1 MS. EVERETT: Sally Everett, NFPA staff, legal
2 counsel for the Standards Council.

3 Mr. Fisher, you indicated, in your opening
4 comments, that there were approximately 9,000 OMNI
5 installations in South Korea. Are there
6 installations in other parts of the world?

7 MR. FISHER: Dr. Chung?

8 DR. CHUNG: Yeah. (Inaudible) South Korea, 12
9 years ago (inaudible) IEC 62035 almost (inaudible).
10 And the international and the (inaudible) test
11 (inaudible) IEC standard. So in (inaudible) in
12 9,000 project, almost IEC standard (inaudible).
13 Yeah.

14 So right now (inaudible) right now (inaudible)
15 so now (inaudible) is issue. Why issue? In Korea
16 (inaudible) that's enough. And (inaudible) that's
17 okay, how nice. But in -- in United States only
18 (inaudible) in this figure. It's (inaudible) don't
19 know exactly (inaudible).

20 And as you know, (inaudible) standard almost
21 international -- almost (inaudible) based on the
22 780 (inaudible) NFPA 780. Outside person don't
23 know the different technology, only (inaudible).
24 So my product export (inaudible) installation
25 (inaudible).

1 MR. FISHER: Let me try to answer your
2 question.

3 Samsung Electronics has indicated that they
4 will install the BCAT in South Korea, in Vietnam,
5 and in China. So it will be not just in South
6 Korea. But the issue came up in the US. They
7 wanted to install in Austin, Texas, where Samsung
8 has a \$13.1 billion semiconductor factory. And the
9 insurance company wouldn't certify it. The
10 insurance company said, well, it's not NFPA 780
11 compliant.

12 So that's -- they don't want lightning to burn
13 that building to the ground, so they want --
14 Samsung, which has done their own testing of it,
15 wants to protect its own structure, but the
16 insurance companies won't allow it. They say,
17 well, we won't insure your buildings if you do
18 that.

19 MS. EVERETT: So are the only installations
20 currently in South Korea of this product?

21 MR. FISHER: Sorry?

22 MS. EVERETT: So are the only installations of
23 this product currently in South Korea?

24 DR. CHUNG: South Korea, China (inaudible) all
25 factories, my system (inaudible) yeah.

1 MS. EVERETT: Currently installed?

2 DR. CHUNG: Yeah.

3 MR. QUITER: Okay. Are there any final
4 questions? Chris?

5 MR. DUBAY: This is for the appellant.
6 Christian Dubay, NFPA staff.

7 Is there a current standard that specifically
8 addresses your technology that you can install and
9 design to?

10 DR. CHUNG: Yeah. Is my technology and my
11 (inaudible). Right now NFPA 780 (inaudible) that's
12 okay. (Inaudible) no problems. Only conference
13 confronting the documents (inaudible) and the scope
14 for it.

15 In the -- as you know, in the NFPA 780 scope
16 (inaudible) is covered (inaudible) yeah. This
17 sentence international big problems. (Inaudible)
18 and the (inaudible) here. International
19 (inaudible) all tie (inaudible), that's okay. But
20 (inaudible) and heights (inaudible), that's okay.
21 Not imitation. So only NFPA 780 (inaudible) yeah.

22 MR. DUBAY: So, just so I understand -- Chris
23 Dubay, NFPA staff.

24 So there is an IEC standard that addresses
25 your technology?

1 DR. CHUNG: That's okay. Yeah.

2 MR. DUBAY: What standard is that?

3 DR. CHUNG: IEC 62305. Yeah, yeah.

4 MR. FISHER: Yes. 62305.

5 MR. DUBAY: Thank you.

6 MR. QUITER: Mr. Guthrie?

7 MR. GUTHRIE: Mitchell Guthrie.

8 I'd just like to make one point of
9 clarification. And, again, it gets back to systems
10 issues. IEC 62305 part three allows -- would
11 allow -- would not disallow the BCAT, the strike
12 termination device that's offered by OMNI LPS.
13 However, the system, as I understand it, in looking
14 at the supplementing information in the TIA, also
15 suggests the use of a different grounding
16 electrode, carbon grounding electrode.

17 DR. CHUNG: Yeah.

18 MR. GUTHRIE: That carbon grounding electrode
19 is not in accordance with the IEC standard. The.
20 IEC standards on grounding components do not
21 recognize anything other than metal.

22 So that would -- with the exception of the
23 grounding electrode, I think the system described
24 in 62305 -- that's essentially, again, part of the
25 problem in calling out systems and saying all

1 systems are equivalent, because there's -- any one
2 of the components changes, that changes the system.

3 MR. QUITER: Do you have any response to that?

4 DR. CHUNG: Yes. (Inaudible) last years I
5 (inaudible). Now it's copper rod used in now
6 United States. It's copper rod. Copper rod. Now
7 it's grounding system almost (inaudible). And the
8 (inaudible) ten times (inaudible). So electrical
9 short current work lightning current is (inaudible)
10 sometimes too much problems.

11 So (inaudible). So what can I do then? So as
12 you know, in so many countries, so many country all
13 use stainless steel. None use the copper
14 (inaudible). So in Korea (inaudible) grounding
15 system in almost changed and the (inaudible) ground
16 (inaudible) new technology.

17 As you say -- I want to you say almost
18 technology day by day, second by second, change.
19 Change by change. Why you 100 years and 15 years
20 ago and the copper rod (inaudible) change. Because
21 why there is too much (inaudible) in the copper rod
22 now. So in case all the Korea first (inaudible).
23 (Inaudible). Yeah, okay. I am (inaudible) and
24 (inaudible) discussion, but now NFPA 780 I want to
25 (inaudible). Okay. Yeah.

1 MR. QUITER: Okay. Thank you.

2 MR. FISHER: Mark Fisher.

3 I make one comment on that, to Mr. Guthrie's
4 point, is this is a big issue, the grounding
5 system, and we do recommend the carbon grounding.
6 And the reason is for the corrosion that happens
7 with the copper system. And that's an improvement.
8 So, again, we've offered an improvement to a
9 current technology, which is precluded by an NFPA
10 780. So what are we supposed to do, just stay
11 outside of the market and deprive the safety of the
12 American public? I don't think so.

13 MR. QUITER: Okay. Mr. Guthrie?

14 MR. GUTHRIE: Mitchell Guthrie.

15 Just to -- to that point, the problem is, as
16 in this proposed TIA, the proposed TIA comes in
17 with something substantial after the period by
18 which the committee can give it due review. So
19 from that point of view, I think it's a bit
20 reaching to make such a substantial change to the
21 TIA.

22 In addition to that, in the IEC standard, in
23 the IEC Technical Committee, TC 81, there has never
24 been a proposal by Korea to submit anything about
25 the acceptance of the carbon ground rod.

1 So, again, you have to go through the process,
2 I think, is the most important part. The standards
3 are written a certain way, and there are certain
4 rules, and we have to follow the rules. But we
5 shouldn't be backing into a lot of these technical
6 issues. It needs to get due review by the
7 technical committees. Thank you.

8 MR. QUITER: So we seem to be evolving into
9 final arguments. So what I'm going to do is end
10 questioning now, and we're going to give each side
11 five minutes for their final arguments.

12 Mr. Fisher, since your group started, I'll
13 have you finish and have the -- have the committee,
14 perhaps represented by Dr. Tobias --

15 Are you going to do final argument?

16 DR. TOBIAS: I can.

17 MR. QUITER: Okay.

18 DR. TOBIAS: To summarize, I think, everything
19 we've heard, that the TIA was considered by what is
20 a balanced and fair committee, it was processed in
21 accordance with the rules and in consideration of
22 the comment from the public, which was
23 overwhelmingly against the TIA.

24 I want to reiterate that the TIA is not a
25 technical TIA. It gives broad permissions. And,

1 in fact, in my read of it, assigns powers to NFPA
2 for approvals that it doesn't claim to have and
3 also permits the AHJ to act as agent for NFPA,
4 which I don't see how that's even possible within
5 the language of the TIA.

6 That said, given the scope issue of NFPA 780
7 and the installation of air terminals and so on --
8 I mean, it may be entirely possible that there
9 really isn't much of an issue here, other than the
10 ground rod one with -- in terms of installing a
11 BCAT air terminal on a 780 with the rest of the --
12 there may be no issue, it just depends what the
13 inspector -- what an inspector approval authority
14 says.

15 The other one -- another issue -- and I heard
16 a lot of language of -- I hear GSA won't approve;
17 the insurance company won't approve; this entity
18 who wants to build something won't approve. NFPA
19 has no control over that. These agencies have
20 adopted an NFPA standard much like a municipality
21 would adopt 70. It's their choice whether to do so
22 or not. They could obviously choose to do
23 something else.

24 And lastly, I might also say that in
25 amplifying what Mr. Guthrie said, there has been no

1 technical submission on this whatsoever. The
2 committee has never considered it because it's
3 never been a proposal to 780.

4 I can say with confidence that -- given we can
5 reconcile the scope issue in the matter, that if a
6 proposal were given, it would give -- be given very
7 serious and careful consideration. Thank you.

8 MR. QUITER: Okay. Mr. Fisher or Dr. Chung.

9 MR. FISHER: Thank you.

10 What we suggest is that this committee should
11 set up a Technical Committee that will consider
12 what needs to be done to bring this system we have
13 into an NFPA 780, the tweaks that were mentioned by
14 Dr. Mousa and others and -- or vice versa, to
15 change an NFPA 780 by reduce -- getting rid of
16 1.1.3 scope limitation clause.

17 Something needs to be done because this is a
18 problem that was created in 1995 by the Standards
19 Council. It has to undue its own work here to
20 allow other people to come forward under NFPA 780.

21 The interesting comment made by Mitchell
22 Guthrie in his comments was the problems --
23 perception in the marketplace is that it can't be
24 compliant with NFPA 780. The 10,000 installers out
25 there, dealing with UF, have to say it's compliant.

1 So an interim solution may be if the NFPA 780 were
2 to issue a letter or a guidance to installers that
3 the system of OMNI LPS is compliant with NFPA 780
4 would be helpful.

5 But I think to just leave this issue to the
6 annual revision cycle, starting in 2017, which ends
7 in 2020, keeps them out of the market for the next
8 five years, and who knows what they'll say at that
9 point.

10 So if there's technical documentation that the
11 Standards Council wants or the NFPA 780 Technical
12 Committee wants, we're happy to provide the
13 technical documentation, happy to provide you with
14 the Samsung testing, happy to provide you with all
15 the technical information you need. But the real
16 problem is the scope of NFPA 780. It's just too
17 limited. And the other problem is the fact that US
18 has a lower safety standard than the IEC 62305.

19 And, in fact, you're not in compliance, and it
20 goes to the issue of Mr. Tobias, that at the
21 current moment, you're not in compliance with US,
22 Korea free-trade agreement, which requires the
23 precedents of the international standard. We are
24 into big international trade issues.

25 It's different with a Korean company because

1 you have a trade agreement where you have to take
2 the international standard, which allows the DCAT,
3 and you're not doing that. So technically, you're
4 in violation of the US, Korea Free-Trade Agreement,
5 not to mention the World Trade Organization.

6 So I would say -- on regard to the process,
7 I'm not going to argue with you about how many
8 producers or competitors -- that issue, I'm going
9 to say that there -- that there are a lot of
10 competitors of the OMNI system, and they have a
11 self-interest to put in the Franklin rod. In fact,
12 you acknowledged two of them don't even sell
13 alternative systems to other producers.

14 So I think that creates a problem, but I think
15 there is an opportunity here to move now and -- on
16 several fronts, one of which is to really appoint a
17 Technical Committee coming out of this exercise,
18 including people like Mr. Guthrie, who are very
19 knowledgeable, to say what tweaks have to be done
20 to get us under a NFPA 780, and to assure the
21 marketplace that we are indeed compliant with NFPA
22 780.

23 MR. QUITER: Okay. Thank you.

24 I saw your hand, but those were final
25 arguments, so I am not going to recognize you at

1 this time.

2 I do want to thank you for coming here today
3 and for your interest in the NFPA standards
4 development process. Council will discuss its
5 response to the appeal in executive session. The
6 decision, when final, will be prepared by staff and
7 delivered to you electronically. That will be the
8 official decision of the council. And in the
9 meantime, no individual council or staff member can
10 represent the council's position on this matter.
11 So, again, thank you very much.

12 - - -

13 (Thereupon, at 10:06 a.m., the proceedings
14 were concluded.)

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COURT CERTIFICATE

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2
3 STATE OF FLORIDA)
4 COUNTY OF LEE)
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6 I, Rebecca L. Crane, Registered
7 Professional Reporter, do hereby certify that I was
8 authorized to and did report the foregoing
9 proceedings to the best of my ability, and that the
10 transcript, pages 1 through 53, is a true and
11 correct record of my stenographic notes.
12

13 Dated this 19th day of April, 2016.
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19 _____
20 Rebecca L. Crane, RPR
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