

**Report of the Committee on
Motion Picture and Television Industry**

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California State Fire Marshal, CA [E]

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Mike D. Bowers, Los Angeles City Fire Dept., CA[E]
Jesus Burciaga, County of Los Angeles Fire Dept., CA [E]
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Herman David, Santa Clarita Studios, CA [U]
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Raymond A. Grill, Rolf Jensen & Assoc., VA [SE]
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Patrick Moynihan, American Broadcasting Co., NY [U]
John F. Mueller, New York St. Dept. of State Office of Fire Prevention & Control, NY [E]
Sam J. Ofshinsky, Nat'l Broadcasting Co., Inc., NY [U]
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Chris R. Reimer, Facilities Protection Systems, Inc., CA [IM]
Chris Rogers, Near North Insurance Brokerage, Inc., CA [I]
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Ronald E. Whitney, HSB Industrial Risk Insurers, CA [I]

Alternates

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(Alt. to R. A. Grill)
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(Alt. to J. Burciaga)
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Kenneth R. Quick Jr., City of Culver City Fire Dept., CA [E]
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Charles A. Labrow, MCA Inc./Universal City Studios, CA[U]
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Staff Liaison: **Ron Coté**

Committee Scope: This Committee shall have primary responsibility for documents on the hazards associated with practices, processes, materials, and facilities associated with motion picture and television production.

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 **Motion Picture and Television Industry** is presented for adoption.

This Report on Comments was prepared by the **Technical Committee on Motion Picture and Television Industry** and documents its action on the comments received on its Report on Proposals on NFPA 140, **Standard on Motion Picture and Television Production Studio Soundstages and Approved Production Facilities**, as published in the Report on Proposals for the 1999 Spring (May) Meeting.

This Report on Comments has been submitted to letter ballot of the **Technical Committee on Motion Picture and Television Industry** which consists of 24 voting members. The results of the balloting, after circulation of any negative votes, can be found in the report.

NFPA 140 — A99 ROC

(Log #1)

140- 1 - (4-2.2 Exception No. 1 and 2; A-4-2.2 Exception No. 1):
Reject

SUBMITTER: Technical Correlating Committee on Automatic
Sprinkler Systems

COMMENT ON PROPOSAL NO: 140-13

RECOMMENDATION: Delete Exceptions No. 1 and No. 2 to
Section 4-2.2 and also delete Section A-4-2.2 Exception No. 1 as
proposed.

SUBSTANTIATION: The material proposed by ROP Proposal
140-13 is intended to address the shielding of combustibles from
sprinkler system discharge in sound stages and production facilities.
However, the current provisions of NFPA 13 adequately address this
issue. Where it is not possible to position sprinklers around
obstructions that would cause extensive shielding, the sprinkler
system discharge criteria for an Extra Hazard Group 2 occupancy
would be appropriate as indicated in 1-4.7.3.2 of the 1996 edition of
NFPA 13.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: The submitter's substantiation
statement that reads "the current provisions of NFPA 13, Standard
for the Installation of Sprinkler Systems, adequately address this
issue" is not accurate. The following explanation is based on the
wording proposed for NFPA 13-1999 because that is the edition that
the new NFPA 140, Standard on Motion Picture and Television
Production Studio Soundstages and Approved Production Facilities,
will reference. [If the explanation were based on the language of
current NFPA 13-1996, the same arguments would hold — the
wording is substantially the same.]

Proposed NFPA 13-1999:2-1.3.2 reads:

2-1.3.2 Extra Hazard (Group 2). Includes Extra Hazard (Group
1) occupancies with moderate to substantial amounts of flammable
or combustible liquids or where shielding of combustibles is
extensive.

The wording of 2-1.3.2 has the effect of saying that Extra Hazard
(Group 2) includes: Extra Hazard (Group 1) occupancies with
moderate to substantial amounts of flammable or combustible
liquids, AND Extra Hazard (Group 1) occupancies where shielding
of combustibles is extensive.

The wording used and the sentence construction do not lead the
reader to understand that an occupancy of a lesser hazard than
Extra Hazard (Group 1) is to be classified as Extra Hazard (Group
2) if there is extensive shielding of combustibles. For example, the
furnishings and combustible loading typically associated with a
soundstage would lead to an Ordinary Hazard (Group 2)
classification [this is consistent with the proposed NFPA 13:A-2-
1.2.2 appendix list of examples that includes "stages" in the
Ordinary Hazard (Group 2) occupancy classification]. The
wording in NFPA 13 is insufficient to cause the user to change the
soundstage's classification — from Ordinary Hazard (Group 2) to
Extra Hazard (Group 2) — if the soundstage has extensive shielding
of combustibles.

NFPA 13:2-1.3.2 could be reworded to read:

2-1.3.2 Extra Hazard (Group 2). Includes:

- (a) Extra Hazard (Group 1) occupancies with moderate to
substantial amounts of flammable or combustible liquids, or
- (b) Any occupancy classification where shielding of combustibles
is extensive.

Even if NFPA 13:2-1.3.2 were reworded as shown above, the
wording would still be insufficient for NFPA 140's needs. The
subject of "extensive" shielding of combustibles would be open to
interpretation without any additional guidance. But more
importantly, the NFPA 13 requirements prohibiting obstructions to
sprinkler discharge [the 5-5.5's of proposed NFPA 13-1999] do not
contain exceptions stating that if Extra Hazard (Group 2)
protection is provided, the requirements prohibiting obstructions
are exempted. An authority having jurisdiction enforcing the
requirements of NFPA 13, without any modifications from NFPA
140, would require the installation of additional sprinklers below
solid-ceiling sets and platforms, regardless of whether the sprinkler
system at the underside of the building roof was designed to Extra
Hazard (Group 2).

NFPA 140 needs to state its own deviations from the requirements
of NFPA 13. As detailed in the Report on Proposal substantiation
for NFPA 140, a sprinkler system is not required for this occupancy
by any other NFPA document. The NFPA 140 sprinkler
requirement is offered as an extra — over and above code
requirements. Even with the omission of sprinklers beneath
platforms and solid-ceiling sets there are benefits from the sprinkler
system installed at the underside of the building roof — including
cooling of roof structural elements until the fire service can
respond. The motion picture and television industry recognizes
these benefits and voluntarily installs such sprinkler systems. The
requirement of 4-2.2 codifies current industry
practice. The exceptions to 4-2.2 recognize motion picture industry
production practices that require sets to change constantly. For
example, ceiling sections are flown in and out to
permit special shooting angles or lighting requirements, sometimes
on a scene-by-scene basis.

The Motion Picture and Television Industry Committee
understands the Sprinkler Committee's concern that the "good
name" of sprinkler systems, and that of NFPA 13, Standard for the
Installation of Sprinkler Systems, not be sullied. If there (1) were to
be a fire in a soundstage where the Extra Hazard (Group 2)
sprinkler system discharge was obstructed due to solid-ceiling sets
or platforms, and (2) the sprinkler system performance was not that
expected of a system in full compliance with NFPA 13, then it could
be reported that the system did not meet the provisions of NFPA 13.

It would be unfortunate if the NFPA 140 document was forced
either (1) to remove its requirement for sprinklering of new
soundstages, or (2) require an "approved" sprinkler system without
mandating the use of NFPA 13.

If the sprinkler requirement were removed from NFPA 140, it
would leave a weak and ineffective document. The State of
California has requirements for the motion picture industry that
include sprinkler provisions similar to those proposed for NFPA
140. NFPA 140 is intended to make these provisions available
nationwide [and internationally]. Numerous states, in addition to
California, share in the benefits provided by the motion picture and
television industry. The authorities having jurisdiction in those
states need the NFPA 140 document to provide a balanced package
of features. The industry needs the NFPA 140 document for
consistency in protection. The California model has received good
reception from both the enforcing authorities and the industry.

If the NFPA 140 document were to require an "approved"
sprinkler system [i.e., one that was acceptable to the authority
having jurisdiction — authority having jurisdiction without
mandating the use of NFPA 13, the enforcement effort would be
chaotic. Each authority having jurisdiction would have to establish
requirements for sprinkler system features that NFPA 13 already
adequately addresses. In effect, the AHJ's would probably resort to
requiring compliance with NFPA 13 for all sprinkler system
considerations other than obstructions to sprinkler discharge. The
Motion Picture and Television Industry Committee believes that it is
better to reference NFPA 13 via mandatory requirements and permit
the exemptions that are so very needed by the industry. The needed
exceptions appear as Exception No. 1 and Exception No. 2 to 4-2.2.
The appendix material [A-4-2.2 Exception No. 1] provides guidance
on how to meet the exception's intent. This is consistent with a
performance-based approach.

NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 24
VOTE ON COMMITTEE ACTION:

AFFIRMATIVE: 23

NOT RETURNED: 1 Burciaga

NFPA 140 — A99 ROC

(Log #2)

140- 2 - (4-2.2 and A-4-2.2): Reject

SUBMITTER: William J. Boswell, Wausau HPR Engr

COMMENT ON PROPOSAL NO: 140-13

RECOMMENDATION: Revise 4-2.2, Exception No. 1 to read:

The requirements of NFPA 13 prohibiting obstructions to sprinkler discharge shall not be applicable if all approved mitigation techniques in Section 4-2.3 are employed.

Relocate A-4-2.2 Exception No. 1 to create a new section (4-2.3) and revise using language suitable for the body of the text (Manual and Style).

SUBSTANTIATION: Proposed language is unenforceable.

COMMITTEE ACTION: Reject.

COMMITTEE STATEMENT: The submitter has not substantiated why each and every mitigation technique needs to be employed for each and every soundstage sprinkler system that involves shielded combustibles. The submitter's statement that the "proposed language is unenforceable" is not accurate. Proposed Exception No. 1 to 4-2.2 requires that the mitigation techniques employed be "approved." The word "approved" means acceptable to the authority having jurisdiction (AHJ). Authorities having jurisdiction are accustomed to judging whether a design or feature meets the standard's intent. The appendix material offers guidance that is useful to the designer and the AHJ. The combination of mandatory text in the body of the standard and advisory text in the appendix adequately addresses the subject. It offers a performance-based approach to a situation that is variable; no one solution can be expected to be optimal for all facilities and conditions.

See also the committee statement supporting the rejection of Comment 140-1 (Log #1).

NUMBER OF COMMITTEE MEMBERS ELIGIBLE TO VOTE: 24

VOTE ON COMMITTEE ACTION:

AFFIRMATIVE: 23

NOT RETURNED: 1 Burciaga
