



## Public Comment No. 45-NFPA 101-2019 [ Section No. 15.2.2.2.4 ]

### 15.2.2.2.4\* Locking of Classroom Doors and Other Instructional Spaces.

#### 15.2.2.2.4.1

Classroom doors and doors to other instructional spaces shall be permitted to be locked provided that the locking means is approved and all of the following conditions are met:

- (1) The locking means shall be capable of being engaged from the egress side of the door without opening the door.
- (2) The unlocking and unlatching from the egress side of the door shall be accomplished without the use of a key, tool, or special knowledge or effort.
- (3) Two non-simultaneous releasing operations shall be permitted where approved by the authority having jurisdiction.
- (4) The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor.
- (5) Locks, if remotely engaged, shall be unlockable from the egress side of the door without the use of a key, tool, or special knowledge or effort.
- (6) The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.
- (7) The locking means shall not modify the door closer, panic hardware, or fire exit hardware or impair their operation.
- (8) Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.
- (9) The emergency action plan, required by 15.7.1, shall address the use of the locking and unlocking means from both sides of the door.
- (10) Staff shall be drilled in the engagement and release of the locking means, from both sides of the door, as part of the emergency egress drills required by 15.7.2.

#### 15.2.2.2.4.2

Where existing classroom doors and doors to instructional spaces are replaced, they shall comply with the provisions of 14.2.2.2.4.

### Additional Proposed Changes

File Name	Description	Approved
101_CCN_28.pdf	NFPA 101 Correlating Committee Note No. 28	

### Statement of Problem and Substantiation for Public Comment

Review the proposed revisions to determine whether they would permit the addition of a second lock/latch releasing motion (operation) on existing doors if intended. Provide suggested revisions to Ch. 43, which can be incorporated via second correlating revisions, if needed.

NOTE: This Public Comment appeared as CC Note No. 28 in the First Draft Report on First Revision No. 6866.

#### Related Item

- FR-6866

### Submitter Information Verification

**Submitter Full Name:** CC ON SAF\_AAC

**Organization:** NFPA

**Street Address:**

**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Thu Mar 07 11:49:11 EST 2019  
**Committee:** SAF-END

## Committee Statement

**Committee Action:** Rejected but see related SR

**Resolution:**

**Resolution:** [SR-6639-NFPA 101-2019](#)

**Statement:** It is the intent of 15.2.2.2.4.1(3) to permit the installation of new equipment that requires two releasing motions on existing doors to meet the locking provisions of 15.2.2.2.4.1. It was unclear whether the installation of new equipment would invoke the requirements of Section 43.5 for modifications, which would send the user to Chapter 14 for new educational occupancies, limiting the arrangement to one releasing operation. Chapter 43 is clear in 43.1.4.5 that work performed for compliance with the existing occupancy requirements is exempt from its requirements. The proposed annex note clarifies the intent.

The END committee requests the CC also add the annex note to A.43.X since it relates to a fundamental concept of Chapter 43 (A.43.4.4 might be an appropriate location).

The revision also changes 'releasing operations' to 'releasing motions' in response to direction from the correlating committee with regard to the terminology change in Ch. 7.



## Correlating Committee Note No. 28-NFPA 101-2018 [ Section No. 15.2.2.2.4 ]

### Submitter Information Verification

**Committee:** SAF-AAC

**Submittal Date:** Tue Dec 11 11:48:56 EST 2018

### Committee Statement and Meeting Notes

**Committee Statement:** Review the proposed revisions to determine whether they would permit the addition of a second lock/latch releasing motion (operation) on existing doors if intended. Provide suggested revisions to Ch. 43, which can be incorporated via second correlating revisions, if needed.

FR-6866-NFPA 101-2018

### Ballot Results

✔ This item has passed ballot

11 Eligible Voters

3 Not Returned

8 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

#### Not Returned

Carson, Wayne G. Chip

Gilyeat, Sharon S.

Lyman, Dale L.

#### Affirmative All

Bush, Kenneth E.

Harbuck, Stanley C.

Hopper, Howard

Hugo, Jeffrey M.

Lucas, Jeffrey A.

Quiter, James R.

Reiswig, Rodger

Rosenbaum, Eric R.

**Public Comment No. 217-NFPA 101-2019 [ Section No. 15.2.2.2.4.1 ]****15.2.2.2.4.1**

Classroom doors and doors to other instructional spaces shall be permitted to be locked provided that the locking means is approved and all of the following conditions are met:

- (1) The locking means shall be capable of being engaged from the egress side of the door without opening the door.
- (2) The unlocking and unlatching from the egress side of the door shall be accomplished without the use of a key, tool, or special knowledge or effort.
- (3) ~~Two non-simultaneous releasing operations shall be permitted where approved by the authority having jurisdiction~~ The releasing mechanism shall open the door leaf with not more than one releasing motion .
- (4) The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor.
- (5) Locks, if remotely engaged, shall be unlockable from the egress side of the door without the use of a key, tool, or special knowledge or effort.
- (6) The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.
- (7) The locking means shall not modify the door closer, panic hardware, or fire exit hardware or impair their operation.
- (8) Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.
- (9) The emergency action plan, required by 15.7.1, shall address the use of the locking and unlocking means from both sides of the door.
- (10) Staff shall be drilled in the engagement and release of the locking means, from both sides of the door, as part of the emergency egress drills required by 15.7.2.

**Statement of Problem and Substantiation for Public Comment**

BHMA is gravely concerned with implications to life safety should NFPA 101 allow up to two releasing motions to release a door for egress. For example, consider these requirements in NFPA 101:

7.2.1.5.10\* A latch or other fastening device on a door leaf shall be provided with a releasing device that has an obvious method of operation and that is readily operated under all lighting conditions.

Allowing up to two releasing motions to release a door for egress, would, from a simplistic perspective, allow additional locking / latching hardware to be installed on the door. Unfortunately, simply allowing additional hardware with one more releasing motion also invites unintended consequences.

Only after appropriate additional requirements which address the questions below are included in NFPA 101 Life Safety Code should the committee consider allowing up to two releasing motions in doors in the means of egress:

- Considering the wide variety of physical and mental abilities of every potential occupant, in every conceivable and inconceivable emergency and non-emergency situation, and in absolute darkness, how can it be assured that each and every potential occupant would know that two releasing motions are required, and be able to accomplish the two releasing motions in order to effect egress?
- If hardware is installed where one releasing motion must occur prior to the second, how can it be assured each occupant will know the required sequence? OR, How can it be assured that not more than two releasing motions are required regardless of the sequence of the motions?

**Related Item**

- FR 6867

**Submitter Information Verification**

**Submitter Full Name:** John Woestman

**Organization:** Kellen Company

**Affiliation:** Builders Hardware Manufacturers Association  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Wed May 08 11:01:59 EDT 2019  
**Committee:** SAF-END

### Committee Statement

**Committee Action:** Rejected

**Resolution:** The committee stands on its substantiation for FR-6867. The committee is in support of providing a safe package of code requirements that is realistic and achievable for facilities that have existing doors that need a solution to lock them for security purposes. Permitting two releasing operations addresses the challenges of retrofitting existing doors, which often leads to dangerous, non-compliant barricade-type products rather than safe locking hardware. The new language provides a safe option for doors in existing facilities to lock doors without providing an challenge to the facility and a strain on resources. It is further noted that a locking arrangement with two releasing motions would require the AHJ's permission. The questions posed by the submitter are addressed by the drill requirement in item (10). The Code can never completely eliminate risk; however, it minimizes risk through the application of reasonable, minimum safeguards for life safety.



## Public Comment No. 61-NFPA 101-2019 [ Section No. 16.1.6.1 ]

### 16.1.6.1

Day care occupancies, other than day care homes, shall be limited to the building construction types specified in Table 16.1.6.1 based on the number of stories in height as defined in 4.6.3. (See 8.2.1.)

Table 16.1.6.1 Construction Type Limitations

Construction Type	Sprinklered <sup>b</sup>	Stories in Height <sup>a</sup>					
		One Story Below <sup>c</sup>	1	2	3-4	>4 but Not High-Rise	High-Rise
I (442)	Yes	X	X	X	X	X	X
	No	NP	X	X	X	NP	NP
I (332)	Yes	X	X	X	X	X	X
	No	NP	X	X	X	NP	NP
II (222)	Yes	X	X	X	X	X	X
	No	NP	X	X	X	NP	NP
II (111)	Yes	X	X	X	X	X	NP
	No	NP	X	NP	NP	NP	NP
II (000)	Yes	X	X	X	X	NP	NP
	No	NP	X	NP	NP	NP	NP
III (211)	Yes	X	X	X	X	NP	NP
	No	NP	X	NP	NP	NP	NP
III (200)	Yes	NP	X	X	NP	NP	NP
	No	NP	X	NP	NP	NP	NP
IV (2HH)	Yes	X	X	X	NP	NP	NP
	No	NP	X	NP	NP	NP	NP
V (111)	Yes	X	X	X	X	NP	NP
	No	NP	X	NP	NP	NP	NP
V (000)	Yes	NP	X	X	NP	NP	NP
	No	NP	X	NP	NP	NP	NP

X: Permitted. NP: Not Permitted.

<sup>a</sup>See 4.6.3.

<sup>b</sup>Sprinklered throughout by an approved, supervised automatic sprinkler system in accordance with Section 9.7. (See 16.3.5.)

<sup>c</sup>One story below the level of exit discharge.

### Additional Proposed Changes

File Name	Description	Approved
101_CCN_49.pdf	NFPA 101 Correlating Committee Note No. 49	

### Statement of Problem and Substantiation for Public Comment

The correlating committee directs all technical committees to review construction limitations for tall timber buildings for consistency with NFPA 5000 and revise as needed.

NOTE: This Public Comment appeared as CC Note No. 49 in the First Draft Report on First Revision No. 6906.

**Related Item**

- FR-6906

**Submitter Information Verification**

**Submitter Full Name:** CC ON SAF\_AAC

**Organization:** NFPA

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Thu Mar 07 15:47:49 EST 2019

**Committee:** SAF-END

**Committee Statement**

**Committee Action:** Rejected

**Resolution:** The committee is taking no action on the construction table relative to mass timber.



## Correlating Committee Note No. 49-NFPA 101-2018 [ Section No. 16.1.6.1 ]

### Submitter Information Verification

**Committee:** SAF-AAC

**Submittal Date:** Tue Dec 11 13:58:33 EST 2018

### Committee Statement and Meeting Notes

**Committee Statement:** The correlating committee directs all technical committees to review construction limitations for tall timber buildings for consistency with NFPA 5000 and revise as needed.

[FR-6906-NFPA 101-2018](#)

### Ballot Results

✓ **This item has passed ballot**

11 Eligible Voters

3 Not Returned

8 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

#### Not Returned

Carson, Wayne G. Chip

Gilyeat, Sharon S.

Lyman, Dale L.

#### Affirmative All

Bush, Kenneth E.

Harbuck, Stanley C.

Hopper, Howard

Hugo, Jeffrey M.

Lucas, Jeffrey A.

Quiter, James R.

Reiswig, Rodger

Rosenbaum, Eric R.





## Public Comment No. 105-NFPA 101-2019 [ Section No. 16.2.4.2 ]

### 16.2.4.2

Not less than two separate exits shall be in accordance with both of the following criteria:

- (1) They shall be provided on every story.
- (2) They shall be accessible from every part of every story and mezzanine; however, exit access travel shall be permitted to be common for the distance permitted as common path of travel by 16.2.5.2.

### Additional Proposed Changes

File Name	Description	Approved
NFPA_Comment_-_Larry_Eaton.docx	Allow use of 2nd floor bathroom in daycare home with only one means of egress off second floor if primary means of egress is protected with sprinklers	

### Statement of Problem and Substantiation for Public Comment

Quite often daycare homes new and existing might not have bathrooms on the main floor and the rescue windows on the second floor do not meet the requirements for rescue windows in NFPA 101. However, the daycare provider does not want approval for the entire second just to use the bathroom at the top of the stairs. One idea is to grant an exception to the requirement for two means of egress off "every floor" and grant an exception in this narrow scope to allow if the primary means of egress is protected by sprinklers. This would allow daycare providers to use a second bathroom without modifying windows on the second floor. A second idea is to require a rescue window in the bathroom to meet the requirement instead of every living area that will not be utilized by clients.

#### Related Item

- daycare homes

### Submitter Information Verification

**Submitter Full Name:** Larry Eaton  
**Organization:** State of IL OSFM  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Sun Apr 14 21:14:07 EDT 2019  
**Committee:** SAF-END

### Committee Statement

**Committee Action:** Rejected  
**Resolution:** The proposed revision appears to relate to a requirement unique to the state of IL that requires multiple bathrooms for larger day care homes. Day care homes are not required to comply with 16.2.4. There also appears to be no related public input, committee input, or first revision, which makes the proposed revision new material.

Not less than two separate exits shall be in accordance with both of the following criteria:

1. They shall be provided on every story.
2. They shall be accessible from every part of every story and mezzanine; however, exit access travel shall be permitted to be common for the distance permitted as common path of travel by 16.2.5.2.

*Exception: Allow the use of a second floor bath room without secondary means of egress in a daycare home with no bathroom on the approved floor when the primary means of egress is protected by sprinklers.*



## Public Comment No. 195-NFPA 101-2019 [ Section No. 16.3.5.1 ]

### 16.3.5.1

~~Any required sprinkler systems shall be~~ All new daycare occupancies shall be protected with an automatic sprinkler system installed in accordance with Section 9.7 and electrically supervised in accordance with Section 9.7.2

### Statement of Problem and Substantiation for Public Comment

This new text supports the suggested text in CI 6910, but limits the sprinkler system to just the day care occupancy. Where a new day care is added to an existing unsprinklered occupancy, this text would require a sprinkler system in the new day care.

Fire sprinklers in day care are effective. According to <http://sprinklersaves.com/?s=day+care> there are several recent day care facilities where sprinklers provided protection.

Approximately one in ten (11%) structure fires in educational properties in 2011-2015 occurred in day care properties.

#### Related Item

- CI 6910

### Submitter Information Verification

**Submitter Full Name:** Jeffrey Hugo

**Organization:** National Fire Sprinkler Associ

**Affiliation:** NFSA

**Street Address:**

**City:**

**State:**

**Zip:**

**Submission Date:** Tue May 07 15:05:49 EDT 2019

**Committee:** SAF-END

### Committee Statement

**Committee Action:** Rejected but see related SR

**Resolution:** [SR-6638-NFPA 101-2019](#)

**Statement:** This revision supports the suggested text in CI 6910. Where a new day care is added to an existing unsprinklered occupancy, this text would require a sprinkler system in the new day care.

Fire sprinklers in day care are effective. According to <http://sprinklersaves.com/?s=day+care> there are several recent day care facilities where sprinklers provided protection.

Approximately one in ten (11%) structure fires in educational properties in 2011-2015 occurred in day care properties.



## Public Comment No. 62-NFPA 101-2019 [ Section No. 17.1.6.1 ]

### 17.1.6.1

Day-care occupancies, other than day-care homes, shall be limited to the building construction types specified in Table 17.1.6.1 based on the number of stories in height as defined in 4.6.3. (See 8.2.1.)

Table 17.1.6.1 Construction Type Limitations

Construction Type	Sprinklered <sup>b</sup>	One Story Below <sup>c</sup>	Stories in Height <sup>a</sup>				High-Rise
			1	2	3-4	>4 but Not High-Rise	
I (442)	Yes	X	X	X	X	X	X
	No	X	X	X	X	X	NP
I (332)	Yes	X	X	X	X	X	X
	No	X	X	X	X	X	NP
II (222)	Yes	X	X	X	X	X	X
	No	X	X	X	X	X	NP
II (111)	Yes	X	X	X	X <sup>d</sup>	X <sup>d</sup>	NP
	No	X	X	X <sup>d</sup>	NP	NP	NP
II (000)	Yes	X	X	X	NP	NP	NP
	No	NP	X	NP	NP	NP	NP
III (211)	Yes	X	X	X	X <sup>d</sup>	NP	NP
	No	X	X	X <sup>d</sup>	NP	NP	NP
III (200)	Yes	NP	X	X	NP	NP	NP
	No	NP	X	NP	NP	NP	NP
IV (2HH)	Yes	X	X	X	NP	NP	NP
	No	X	X	X	NP	NP	NP
V (111)	Yes	X	X	X	X <sup>d</sup>	NP	NP
	No	X	X	X <sup>d</sup>	NP	NP	NP
V (000)	Yes	NP	X	X	NP	NP	NP
	No	NP	X	NP	NP	NP	NP

X: Permitted. NP: Not Permitted.

<sup>a</sup>See 4.6.3.

<sup>b</sup>Sprinklered throughout by an approved, supervised automatic sprinkler system in accordance with Section 9.7. (See 17.3.5.)

<sup>c</sup>One story below the level of exit discharge.

<sup>d</sup>Permitted only if clients capable of self-preservation.

### Additional Proposed Changes

File Name	Description	Approved
101_CCN_50.pdf	NFPA 101 Correlating Committee Note No. 50	

### Statement of Problem and Substantiation for Public Comment

The correlating committee directs all technical committees to review construction limitations for tall timber buildings

for consistency with NFPA 5000 and revise as needed.

NOTE: This Public Comment appeared as CC Note No. 50 in the First Draft Report.

**Related Item**

- CI-6909

**Submitter Information Verification**

**Submitter Full Name:** CC ON SAF\_AAC

**Organization:** NFPA

**Street Address:**

**City:**

**State:**

**Zip:**

**Submittal Date:** Thu Mar 07 15:55:27 EST 2019

**Committee:** SAF-END

**Committee Statement**

**Committee Action:** Rejected

**Resolution:** The committee is taking no action on the construction table with regard to mass timber.



## Correlating Committee Note No. 50-NFPA 101-2018 [ Section No. 17.1.6.1 ]

### Submitter Information Verification

**Committee:** SAF-AAC

**Submittal Date:** Tue Dec 11 14:00:29 EST 2018

### Committee Statement and Meeting Notes

**Committee Statement:** The correlating committee directs all technical committees to review construction limitations for tall timber buildings for consistency with NFPA 5000 and revise as needed.

### Ballot Results

✓ **This item has passed ballot**

11 Eligible Voters

3 Not Returned

8 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

#### Not Returned

Carson, Wayne G. Chip

Gilyeat, Sharon S.

Lyman, Dale L.

#### Affirmative All

Bush, Kenneth E.

Harbuck, Stanley C.

Hopper, Howard

Hugo, Jeffrey M.

Lucas, Jeffrey A.

Quiter, James R.

Reiswig, Rodger

Rosenbaum, Eric R.



## Public Comment No. 250-NFPA 101-2019 [ Section No. 17.2.2.2.6 ]

### 17.2.2.2.6 Locking of Classroom Doors and Doors to Other Client Care Spaces.

#### 17.2.2.2.6.1

Classroom doors and doors to other client care spaces shall be permitted to be locked provided that the locking means is approved and all of the following conditions are met:

- (1) The locking means shall be capable of being engaged from the egress side of the door without opening the door.
- (2) The unlocking and unlatching from the egress side of the door shall be accomplished without the use of a key, tool, or special knowledge or effort.
- (3) Two non-simultaneous releasing operations shall be permitted where approved by the authority having jurisdiction.
- (4) The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor.
- (5) Locks, if remotely engaged, shall be unlockable from the egress side of the door without the use of a key, tool, or special knowledge or effort.
- (6) The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.
- (7) The locking means shall not modify the door closer, panic hardware, or fire exit hardware or impair their operation.
- (8) Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.
- (9) The emergency action plan, required by 17.7.1, shall address the use of the locking and unlocking means from both sides of the door.
- (10) Staff shall be drilled in the engagement and release of the locking means, from both sides of the door, as part of the emergency egress drills required by 17.7.2.

#### 17.2.2.2.6.2

Where existing classroom doors and doors to client care spaces are replaced, they shall comply with the provisions of 16.2.2.2.6.

## Additional Proposed Changes

File Name	Description	Approved
101_CCN_29.pdf	NFPA 101 Correlating Committee Note No. 29	

## Statement of Problem and Substantiation for Public Comment

Review the proposed revisions to determine whether they would permit the addition of a second lock/latch releasing motion (operation) on existing doors if intended. Provide suggested revisions to Ch. 43, which can be incorporated via second correlating revisions, if needed.

NOTE: This Public Comment appeared as CC Note No. 29 in the First Draft Report on FR-6871.

### Related Item

- FR-6871

## Submitter Information Verification

**Submitter Full Name:** CC ON SAF\_AAC  
**Organization:** NFPA  
**Street Address:**

**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Fri May 10 11:17:14 EDT 2019  
**Committee:** SAF-END

## Committee Statement

**Committee Action:** Rejected but see related SR

**Resolution:**

SR-6640-NFPA 101-2019

**Statement:** It is the intent of 17.2.2.2.6.1(3) to permit the installation of new equipment that requires two releasing motions on existing doors to meet the locking provisions of 17.2.2.2.6.1. It was unclear whether the installation of new equipment would invoke the requirements of Section 43.5 for modifications, which would send the user to Chapter 16 for new day-care occupancies, limiting the arrangement to one releasing operation. Chapter 43 is clear in 43.1.4.5 that work performed for compliance with the existing occupancy requirements is exempt from its requirements. The proposed annex note clarifies the intent.

The END committee requests the CC also add the annex note to A.43.X since it relates to a fundamental concept of Chapter 43 (A.43.4.4 might be an appropriate location).

The revision also changes 'releasing operations' to 'releasing motions' in response to direction from the correlating committee with regard to the terminology change in Ch. 7.





## Correlating Committee Note No. 29-NFPA 101-2018 [ Section No. 17.2.2.2.6 ]

### Submitter Information Verification

**Committee:** SAF-AAC

**Submittal Date:** Tue Dec 11 11:56:57 EST 2018

### Committee Statement and Meeting Notes

**Committee Statement:** Review the proposed revisions to determine whether they would permit the addition of a second lock/latch releasing motion (operation) on existing doors if intended. Provide suggested revisions to Ch. 43, which can be incorporated via second correlating revisions, if needed.

[FR-6871-NFPA 101-2018](#)

### Ballot Results

✔ This item has passed ballot

11 Eligible Voters

3 Not Returned

8 Affirmative All

0 Affirmative with Comments

0 Negative with Comments

0 Abstention

#### Not Returned

Carson, Wayne G. Chip

Gilyeat, Sharon S.

Lyman, Dale L.

#### Affirmative All

Bush, Kenneth E.

Harbuck, Stanley C.

Hopper, Howard

Hugo, Jeffrey M.

Lucas, Jeffrey A.

Quiter, James R.

Reiswig, Rodger

Rosenbaum, Eric R.



## Public Comment No. 218-NFPA 101-2019 [ Section No. 17.2.2.2.6.1 ]

### 17.2.2.2.6.1

Classroom doors and doors to other client care spaces shall be permitted to be locked provided that the locking means is approved and all of the following conditions are met:

- (1) The locking means shall be capable of being engaged from the egress side of the door without opening the door.
- (2) The unlocking and unlatching from the egress side of the door shall be accomplished without the use of a key, tool, or special knowledge or effort.
- (3) ~~Two non-simultaneous releasing operations shall be permitted where approved by the authority having jurisdiction~~ The releasing mechanism shall open the door leaf with not more than one releasing motion .
- (4) The releasing mechanism for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor.
- (5) Locks, if remotely engaged, shall be unlockable from the egress side of the door without the use of a key, tool, or special knowledge or effort.
- (6) The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.
- (7) The locking means shall not modify the door closer, panic hardware, or fire exit hardware or impair their operation.
- (8) Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.
- (9) The emergency action plan, required by 17.7.1, shall address the use of the locking and unlocking means from both sides of the door.
- (10) Staff shall be drilled in the engagement and release of the locking means, from both sides of the door, as part of the emergency egress drills required by 17.7.2.

## Statement of Problem and Substantiation for Public Comment

BHMA is gravely concerned with implications to life safety should NFPA 101 allow up to two releasing motions to release a door for egress. For example, consider these requirements in NFPA 101:

7.2.1.5.10\* A latch or other fastening device on a door leaf shall be provided with a releasing device that has an obvious method of operation and that is readily operated under all lighting conditions.

Allowing up to two releasing motions to release a door for egress, would, from a simplistic perspective, allow additional locking / latching hardware to be installed on the door. Unfortunately, simply allowing additional hardware with one more releasing motion also invites unintended consequences.

Only after appropriate additional requirements which address the questions below are included in NFPA 101 Life Safety Code should the committee consider allowing up to two releasing motions in doors in the means of egress:

- Considering the wide variety of physical and mental abilities of every potential occupant, in every conceivable and inconceivable emergency and non-emergency situation, and in absolute darkness, how can it be assured that each and every potential occupant would know that two releasing motions are required, and be able to accomplish the two releasing motions in order to effect egress?
- If hardware is installed where one releasing motion must occur prior to the second, how can it be assured each occupant will know the required sequence? OR, How can it be assured that not more than two releasing motions are required regardless of the sequence of the motions?

### Related Item

- FR 6872

## Submitter Information Verification

**Submitter Full Name:** John Woestman

**Organization:** Kellen Company

**Affiliation:** Builders Hardware Manufacturers Association  
**Street Address:**  
**City:**  
**State:**  
**Zip:**  
**Submittal Date:** Wed May 08 11:05:43 EDT 2019  
**Committee:** SAF-END

### Committee Statement

**Committee Action:** Rejected

**Resolution:** The committee stands on its substantiation for FR-6872. The committee is in support of providing a safe package of code requirements that is realistic and achievable for facilities that have existing doors that need a solution to lock them for security purposes. Permitting two releasing operations addresses the challenges of retrofitting existing doors, which often leads to dangerous, non-compliant barricade-type products rather than safe locking hardware. The new language provides a safe option for doors in existing facilities to lock doors without providing an challenge to the facility and a strain on resources. It is further noted that a locking arrangement with two releasing motions would require the AHJ's permission. The questions posed by the submitter are addressed by the drill requirement in item (10). The Code can never completely eliminate risk; however, it minimizes risk through the application of reasonable, minimum safeguards for life safety.