

**NFPA® 1917-2013**

*Standard for Automotive Ambulances*

**TIA Log No.** 1089

**Reference:** 4.12.3

**Comment Closing Date:** February 13, 2013

**Submitter:** Dia Gainor, National Association of State EMS Officials (NASEMSO)

*1. Delete 4.12.3 in its entirety and renumber 4.12.4 and its Annex material:*

~~**4.12.3** The maximum top speed of the ambulance shall not exceed either 77 mph (124 km/hr) or the manufacturer's maximum service speed rating for the tires installed on the ambulance, whichever is lower.~~

**Submitter's Substantiation:** NASEMSO cannot support or enforce 4.12.3, and the need for this deletion remains even if the TIA related to Section 4.17 is granted.

There are states where the legal speed limit is above 77 mph, including 80 and 85 mph. Further, in some states, an ambulance operating with lights and sirens can legally exceed the posted speed limit by 10 mph. Therefore, while well intentioned for roadways with a posted speed limit of 65 mph or less, a governor set to 77 mph will actually create a safety hazard as a result of ambulances traveling at much slower speeds than the surrounding traffic. Speed should be governed by the states and the owners and operators of the ambulances. Since not every chassis manufacturer makes speed governors available, NASEMSO is also deeply concerned about the risk aversion expressed by ambulance manufacturers about aftermarket installation and device failure.

Availability of this technology is extremely limited among chassis and aftermarket device manufacturers, and only one brand has been identified that can be set at 77 mph. NASEMSO recognizes the importance of safe ambulance operations and is cognizant of other electronic means of speed monitoring, the annex content on monitoring systems, as well as local EMS agency policies related to the matter.

**Emergency Nature:** The requirement of a speed limiting device that places a maximum speed limit of 77 mph creates a safety hazard for operators and occupants of ambulances, especially in states that have posted speed limits above 77 mph. In some states, For example, Texas, there is a posted speed limit of 85 mph and an NFPA 1917-compliant ambulance would not be able to meet the posted speed limit, thus creating a safety hazard. This is also true in states where emergency vehicles are allowed to exceed the posted speed limit by 10 mph; with 77 mph being the maximum, in a standard that comprises minimum requirements, the posted speed limit would have to be as low as 67 mph which is not common in some states. This requirement places a restriction upon some states that would prohibit them from purchasing an NFPA 1917-compliant ambulance.

*Anyone may submit a comment by the closing date indicated above. To submit a comment, please identify the number of the TIA and forward to the [Secretary, Standards Council](#), 1 Batterymarch Park, Quincy, MA 02169-7471.*