



Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,
"Organization" (§633.026)

Informal Interpretation

Date: 2/3/2020

NFPA Document Number: NFPA 1, 2015

Paragraph Reference: 11.10.1

Explain how the Petitioner's substantial interests are being affected by the question below:

The petitioner (LFO) is being challenged by the property owner who has built a new automobile dealership with repair facility. It's the opinion of the property owner that two way radio communication enhancement systems are not required in their structure; specifically their type of occupancy.

Enter the Petitioner's question concerning an interpretation of the FFPC:

Question: Can minimum radio signal strength requirement for fire department communications be applied to an 8000 square foot building or more to any and all new and existing buildings of any type of occupancy.

Answer: Yes

NFPA 1 11.10 states "In all new and existing buildings, minimum radio signal strength for fire department communications shall be maintained at a level determined by the AHJ". Through additional questions submitted to the LFO who is the petitioner in this case from this board, it was determined that the jurisdiction does in fact determine minimum signal strength to be based of the requirements for signal strength and coverage from the 2013 Edition of NFPA 72. With this info in mind, and notwithstanding the language in FS 633.202 that gives existing high-rise and apartments extended periods of time to comply if found to be non-compliant the Declaratory Statement filed by Charles B. Parks of Broward County makes it clear that NFPA 1 Chapter 11.10 does apply to "all " new and existing buildings regardless of size or occupancy.

Note: It is the Boards opinion that although NFPA 1 is applicable to "all" buildings, care should be taken in its application and not be used as a substitute for a jurisdictions radio system that does not meets the provisions of NFPA 1221 and the LFO is using NFPA 1 11.10 to compensate for an inadequate department radio system.

The following are the relevant codes, statutes, and declaratory statements used in rendering this opinion.

Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675

Website: www.FFMIA.org | Email: info@ffmia.org | http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm



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NFPA 1 Chapter 11.10

11.10 Two-Way Radio Communication Enhancement Systems

11.10.1 In all new and existing buildings, minimum radio signal strength for fire department communications shall be maintained at a level determined by the AHJ.

FS 633.202 Florida Fire Prevention Code:

(18) The authority having jurisdiction shall determine the minimum radio signal strength for fire department communications in all new high-rise and existing high-rise buildings. Existing buildings are not required to comply with minimum radio strength for fire department communications and two-way radio system enhancement communications as required by the Florida Fire Prevention Code until January 1, 2022. However, by December 31, 2019, an existing building that is not in compliance with the requirements for minimum radio strength for fire department communications must apply for an appropriate permit for the required installation with the local government agency having jurisdiction and must demonstrate that the building will become compliant by January 1, 2022. Existing apartment buildings are not required to comply until January 1, 2025. However, existing apartment buildings are required to apply for the appropriate permit for the required communications installation by December 31, 2022.

Notice of Declaratory Statement

Department of Financial Services Division of State Fire Marshal

NOTICE IS HEREBY GIVEN that Department of Financial Services has issued an order disposing of the petition for declaratory statement filed by Charles B. Parks, Chief Fire Code Official of Broward County on February 02, 2018. The following is a summary of the agency's disposition of the petition: The Amended Petition requests a determination as to whether Section 633.202(18), Florida Statutes, prohibits the enforcement of NFPA 1, section 11.10, in buildings under 75 feet in height. The Department concludes section 633.202(18), Florida Statutes, does not apply to the enforcement of NFPA 1, section 11.10, in buildings under 75 feet in height. A copy of the Order Disposing of the Petition for Declaratory Statement may be obtained by contacting: Sarah Marcos at Sarah.Marcos@myfloridacfo.com. Please refer all comments to: Sarah Marcos at Sarah.Marcos@myfloridacfo.com.

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Committee Answer Submitted by,
James Groff, Chairman
Informal Fire Code Interpretation Committee

Region 1: Vacant / Vacant

Region 2: Babette Ferris-No response / Vacant

Region 3: James Groff-Yes / Robert Growick-Yes

Region 4: Philip Guglietti-Yes / Cheryl Edwards-Yes

Region 5: Anthony Apfelbeck –Yes / Timothy Ippolito yes

Region 6: Robert Salvaggio-Yes /Alternate Janet Washburn-Yes

Region 7: Bryan Parks-Yes / Vacant

Committee Region Map



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