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From: Elizabeth Johnston [REDACTED]
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To: Senate Health and Social Services
Subject: SB169 Testimony

The State of Alaska State Fire Marshal has adopted the International Fire Code. The International Fire Code requires damper inspections under its acceptance testing requirements in 909.18.3 "Dampers shall be tested for function in their installed condition." This legislation duplicates a code requirement in place in our state by telling the Department of Public Safety to adopt regulations when it has already adopted this code.

The State has not currently adopted the NFPA 80 (Standard for Fire Doors and Other Opening Protectives), NFPA 92 (Standard for Smoke Control Systems), or NFPA 105 (Standard for Smoke Door Assemblies and Other Opening Protectives) but these codes do speak to damper inspections and require them every 6-years for healthcare facilities and 4-years for non-healthcare facilities and are good references for any proposed standard.

The legislation does set a standard of who can perform these inspections and limits them to those with a certification from the American National Standards Institute or through a fire and life safety inspection program of the state or a municipality. It does not allow qualified Fire Protection, Mechanical, Controls, or Electrical Engineers who may be qualified by training or experience to do those inspections. I believe the bill should be amended to also allow this work to be done by engineers without a separate certification. The proposed requirement exceeds the IFC and NFPA codes.

Elizabeth Johnston, PE, FPE