



STATE OF WASHINGTON

DEPARTMENT OF ENTERPRISE SERVICES

1500 Jefferson, Olympia, WA 98504

Washington State Building Code Council

Improving the built environment by promoting health, safety and welfare

STATE FIRE CODE INTERPRETATION NO. 13-03

CODE: 2009 International Fire Code

SECTION: 404.3.3; 915

QUESTION 1: Are the requirements in Section 915 of the Washington State Fire Code applicable to existing schools? The requirements are not in Chapter 46 Construction Requirements for Existing Buildings, but the exception to 915.1 seems to imply retroactivity.

ANSWER 1: **Yes. The alerting system requirements of Section 915 apply to new construction or alteration and repair of an existing system. The exception in 915.1 applies to an alteration or repair of an existing system. However, existing schools must meet the provisions of shelter-in-place and lockdown plans, including identification of prearranged alert and recall signals to notify all occupants. The exception was intended to allow the school and local AHJ the latitude of approving an existing alert signal as an alternate method. The intent of Chapter 46 of the 2009 IFC was to cover all existing building provisions. However, some provisions related to existing buildings remain in other chapters.**

The general requirements of Section 915.1 refer to Chapter 4. The wording of Chapter 4 and Section 915.1 do not specifically identify the requirements as being retroactive, with one exception. Section 404.3.1 states that a shelter-in-place and lockdown plan shall be prepared and maintained for all Group E occupancies. This applies to existing schools. Only that occupancy would be required to meet the provisions for shelter-in-place and lockdown plans. The other requirements in Chapter 4 and Section 915 would be applicable to new construction. Please note the state amendments to the 2012 IFC effective July 1, 2013, do not include lockdown plans.

QUESTION 2: Is there any standard applicable to alerting systems as required by Section 915?

ANSWER 2: Section 915 does not clearly state but does imply that the alerting system is a type of mass notification system (MNS), with the references to NFPA 72 and the similar requirements. The definition of Alert System in Section 402 appears to support that thought. As an MNS, NFPA 72 would be the standard applicable to be used.

QUESTION 3: The exception to Section 915.2 seems to allow a non-electric system. Is the intent to allow a megaphone or something similar? If so, how would the system meet Section 915.4.2.2 to deactivate the fire alarm signals?

ANSWER 3: As long as the alerting system can demonstrated to be effective for the facility, it would be deemed acceptable. This includes the temporary deactivation of the fire alarm audible devices when the alerting system is transmitting, which could be manually done (if approved by the local Fire Authority).

QUESTION 4: Is the alerting system required by Section 915 the same system referenced in Section 404.3.2 item 2 and 404.3.3 item 2?

ANSWER 4: Yes.

QUESTION 5: Is the alerting system required by Section 915 the same system referenced in Section 404.3.2 item 4 and 404.3.3 item 5? Items 4 and 5 referenced here is a two way communication system requirement, for which section 915 makes no mention. Section 915 appears to be a one way signaling system.

ANSWER 5: Yes. Although the alerting system is essentially a one-way communication in Section 915, the requirements in the shelter-in-place and lockdown plans require an additional component of two-way communication for E occupancies.

QUESTION 6: Does the requirement for an alerting system apply to a school with an occupant load less than 50?

ANSWER 6: Yes. Section 404.3.1 states that a shelter-in-place and lockdown plan shall be prepared and maintained for all Group E occupancies. The only exception applies to daycares not co-located on a Group E campus.

SUPERSEDES: None

REQUESTED BY: Seattle Fire Department