



National Electrical Manufacturers Association

Representative Guy Vander Linden
1610 Carbonado Road
Oskaloosa, IA 52577

February 23, 2016

Senator Jeff Danielsen
PO Box 1191
Cedar Falls, IA 50613

Via Email: guy.vander.linden@legis.iowa.gov, jeffdanielson@gmail.com

Dear Representative Vander Linden and Senator Danielsen,

The Fire, Life Safety, Security and Emergency Communication Section of the National Electrical Manufacturers Association (NEMA) supports HSB 539 (HF 2310) and SSB 3017 (SF 2219) which, if enacted, would require the state fire marshal to promulgate and enforce carbon monoxide detection requirements for multiple unit residential buildings (including apartment buildings, hotels and dormitories) and single-family dwellings.

CO poisoning is a leading cause of accidental poisoning death in the United States. High concentrations of CO—a colorless, odorless gas that is produced when fossil fuel is incompletely burned—can cause cognitive impairment, loss of consciousness, coma, and often death. In fact, the U.S. Centers for Disease Control and prevention (CDC) reports that more than 400 people die in the U.S. each year from accidental CO poisoning and estimates that approximately 20,000 Americans seek medical attention annually due to carbon monoxide.

NEMA's support for the bills notwithstanding, we respectfully recommend the following technical changes:

~~“Carbon monoxide alarm” means a device which detects carbon monoxide and which incorporates control equipment and an alarm-sounding unit operated from a power supply either in the unit or obtained at the point of installation~~ IS LISTED BY A NATIONALLY RECOGNIZED TESTING LABORATORY THAT HAS BEEN APPROVED BY THE U.S. OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION TO LIST DEVICES ACCORDING TO THE AMERICAN NATIONAL STANDARDS INSTITUTE / UNDERWRITES LABORATORIES STANDARD 2034 STANDARD FOR SINGLE AND MULTIPLE STATION CARBON MONOXIDE ALARMS OR 2075 STANDARD FOR GAS AND VAPOR DETECTORS AND SENSORS.

NEMA also notes that, while the bill authorizes the state fire marshal to promulgate such rules, the legislative text does not specify power source requirements for the regulated occupancy groups. We would hope that when the Iowa State Fire Marshal does promulgate rules, that office takes into consideration the most recent editions (2015) of the International Building Code and International Fire Code. These codes require that new and substantially remodeled buildings have hardwired CO detection with battery back-up.

Finally, NEMA points out that Iowa has adopted the 2009 edition of the International Residential Code, which requires CO detection in new detached single-family homes. It appears as though HSB 539 and SSB 3017 have a duplicative requirement in 2A a, which reads: “Multiple-unit

residential buildings and **single-family dwellings, the construction of which is begun on or after July 1, 2017**, and that have a fuel-fired heater or appliance, a fireplace, or an attached garage, shall include the installation of carbon monoxide alarms in compliance with the rules established by the state fire marshal under subsection 4.” NEMA suggests removing this requirement since it is repetitive with current law and, instead, requiring under 2A b that all existing single-family dwellings (not just single-family rental units) have carbon monoxide detection.

Thank you and please do not hesitate to reach out should you have any further questions. I look forward to working with you.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jonathan Stewart', with a horizontal line extending to the right.

Jonathan Stewart
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NEMA is the association of electrical equipment manufacturers, founded in 1926 and headquartered in Rosslyn, Virginia. It represents nearly 400 electrical and medical imaging manufacturers. Our combined industries account for more than 400,000 American jobs and more than 7,000 facilities across the U.S. Domestic production exceeds \$117 billion per year. NEMA Fire, Life Safety, Security and Emergency Communication members manufacture fire, smoke, and carbon monoxide detection and warning equipment.