



American Council of Engineering Companies of New York

**Comments Submitted regarding
Proposed New Rule 3 RCNY §104-04, entitled “Certification of Corrected Defects in Fire
Alarm System Installations”
August 25, 2020**

The American Council of Engineering Companies of New York (ACEC New York) thanks The New York City Fire Department for this opportunity to submit comment on the Proposed New Rule 3 RCNY §104-04, entitled “Certification of Corrected Defects in Fire Alarm System Installations.”

ACEC New York represents close to 300 consulting engineering and affiliate firms throughout New York State, with a concentrated presence in New York City. Our members plan and design the fire protection, plumbing, structural, mechanical, electrical, environmental and technology systems for the City’s buildings and infrastructure.

We appreciate the proposed rule’s goal of ensuring timely certification of corrections of certain fire alarm system defects. At the same time, our Fire Code Committee has expressed concern with the required signatures. Although two signatures are required, it appears that two employees at the same company could provide those signatures. This could pose a conflict of interest. The committee recommends that one of the required signatures be that of a registered design professional such as a professional engineer or registered architect. We believe this requirement would provide a higher level of verification.

For further information please contact:

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