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:
Hannah O’Grady
Senior Vice President, ACEC New York
hannah@acecny.org

Bill Murray
NYC Director of Government Relations, ACEC New York
bill@acecny.org