



Automatic Fire Alarm Association
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Written Testimony to the House Committee on Business and Labor
Senate Bill 1596

February 26, 2024

Representative Paul Holvey - Chair
Representative Lucetta Elmer - Vice-Chair
Representative Nathan Sosa - Vice Chair
Members of the House Committee on Business and Labor

The Automatic Fire Alarm Association (AFAA) is a national trade organization whose membership includes fire alarm system contractors, service providers and inspection testing and maintenance companies, fire alarm system product manufactures and fire protection engineers. AFAA started in 1953.

AFAA is not opposed to the Right to Repair for equipment and appliances that are not associated with life safety systems. AFAA supports the Right to Repair for wheelchair and other mobility devices as well as farm equipment.

AFAA is concerned on who may be allowed to repair the components equipment that make up a fire alarm system, life safety systems, fire protection releasing systems, smoke alarms, CO alarms, and intrusion alarms (which in residential settings are often combined with fire alarms). The occupants of the buildings that these systems and devices are installed within depend that they will work when they are required to operate. You depend on these systems to operate within the building that this morning's hearing is being conducted in, or the hotel that you may stay in during a trip. You also depend on a smoke or CO alarm to operate within your home.

In Oregon, fire alarm and life safety systems are regulated through the Oregon State Fire Marshal and local Authorities Having Jurisdiction (AHJ). Oregon uses the 2022 edition of the Oregon Fire Code, which adopts by reference the 2019 edition of NFPA 72®, National Fire Alarm and Signaling Code®. Within NFPA 72, there are mandated requirements on the qualifications of those that work on a fire alarm system as well as requirements on how a fire alarm system is to be tested after repairs or modifications are rendered.

In Oregon, an individual must have a Limited Energy Technicians License which is administered through the Building Codes Division.

Fire Alarm and Life Safety Systems and their components parts are far too vital to be repaired by an individual who may not be familiar with the requirements that are found within NFPA 72 or UL® 864, Control Units and Accessories for Fire Alarm System, UL 217, Standard for Safety Smoke Alarms, UL 268,

Smoke Detectors for Fire Alarm Systems and other UL Standards. An individual consumer may not even be aware of these standards and requirements when attempting an alarm repair, or when making sure a repair contractor is qualified to do the repair. There is also a risk that hackers could get access codes and other information that would help them attack the consumer, and others with similar systems.

AFAA is requesting that there be amended language to SB 1596 to exempt fire alarm and life safety systems and intrusion detection systems from the requirements being promulgated. AFAA suggests incorporation of an explicit exclusion in the text of the Act, or a clarification in the legislative report, to ensure that consumers who have purchased alarm systems can continue to rely on the protections these systems afford:

Nothing in this Act (including any requirement to disclose security codes, passwords or system schematics) shall apply to a manufacturer, dealer, distributor, integrator, installer or monitoring service provider of a security device or alarm system (including but not limited to all central station alarm systems and any other digital electronic equipment used to prevent, detect, protect against, or respond to fire, carbon monoxide risks, falls, medical alerts or security incidents or control access to residential, commercial, and governmental property, services, or information systems).

There are a number of Right to Repair bills going through a number of state houses this year. A number of states, Arizona, California, Hawaii, Illinois, Michigan and New York have either passed into law or have language within proposed bills with this exemption.

Sincerely;



Shane M. Clary
Vice President
Automatic Fire Alarm Association