



Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,
"Organization" (§633.026)

Informal Interpretation

Request

Date: 11/21/23

Explain how the Petitioner's substantial interests are being affected by the question below:

Granite is a telecommunications carrier licensed by the Federal Communications Commission and the Florida Public Service Commission. Granite provides a service which replaces analog "plain old telephone service" ("POTS") lines with a service called EPIK, which uses patented technology (U.S. Patent No. 10,986,555). The replacement of the POTS lines takes place on the telecommunication side of the protected premises communications terminal block without any modifications to the existing fire alarm system.

In a non-binding interpretation issued on October 20, 2023, the Florida Fire Marshals and Inspectors Association ("FFMIA") stated:

"The submitted documentation appears to meet the requirements of NFPA 72 and 69A-48, making the EPIK service a suitable replacement for traditional analog POTS lines. However, the local jurisdiction and AHJ may have specific permitting requirements or questions. The contractor must address these to ensure that the jurisdiction and AHJ can assess compliance with the installation of the system for supervising station fire alarm service". The FFMIA interpretation further referred to ***NFPA 1, § 1.12.8 "for AHJ authority relating to permits and alterations to fire alarm systems."***

Granite wishes to confirm that the EPIK service is not part of the fire alarm system and that its installation does not constitute a "modification" or "alteration" to a fire alarm system. Existing analog POTS lines are not considered part of the fire alarm system. Like the existing analog POTS lines that it replaces, the EPIK service may be used not only for fire alarm communications, but also for any application requiring connection to the public switched telephone network ("PSTN") via an analog POTS line, such as fax lines and elevator lines. Moreover, installation of the EPIK service involves only replacement of telecommunications equipment on the telecommunications side of the terminal block. A diagram showing the relative positions of the EPIK equipment, telecommunications terminal block (i.e., demarcation point), and fire alarm system are included with this petition.

Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

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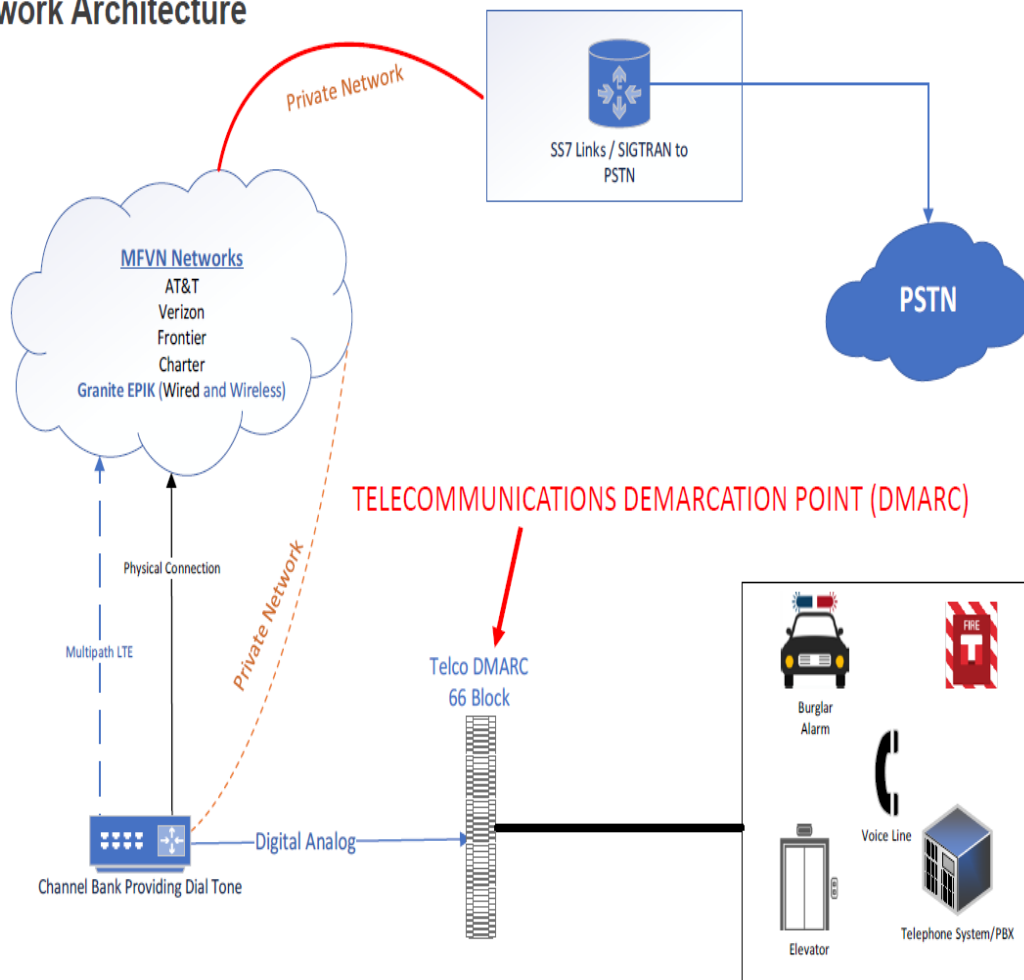
Website: www.FFMIA.org | Email: info@ffmia.org | http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm



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EPIK Network Architecture



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Other AHJ's that have reviewed this issue have come to the same conclusion. Communications from two examples (1) the California State Fire Marshal and the (2) Louisiana Office of the State Fire Marshal—are included with this petition (see below):

(1)



CALIFORNIA DEPARTMENT OF FORESTRY & FIRE PROTECTION OFFICE OF THE STATE FIRE MARSHAL FIRE ENGINEERING & INVESTIGATIONS DIVISION BUILDING MATERIALS LISTING PROGRAM

LISTING SERVICE

LISTING No.:	7305-2354:0001
CATEGORY:	7305 - MISCELLANEOUS SIGNALING EQUIPMENT
LISTEE:	Granite Telecommunications 100 Newport Ave Ext., Quincy, MA, 02171 Contact: Galvin, Michael 617-745-5168 Email: legal@granitenet.com
DESIGN:	<p>Model GE-xPTMxx EPIK Analog Telecom Replacement Equipment, where x is an alphanumeric character representing options not related to safety. Product is a Plain Old Telephone Service (POTS) replacement that connects to LAN and 4G to provide service to all traditional analog devices. This product acts as a managed facilities-based voice network (MFVN) and is considered part of the communication infrastructure, not the fire alarm system.</p> <p>Refer to listee's printed data sheet for additional detailed product description and operational considerations.</p>
RATING:	120 VAC, 60 Hz, 1.6 A
INSTALLATION:	In accordance with listee's printed installation instructions, applicable codes and ordinances, and in a manner acceptable to the authority having jurisdiction.
MARKING:	Listee's name, model number, electrical rating, and UL label.
APPROVAL:	Listed as analog telecom replacement equipment for use with analog line devices. Telephone service subscriber shall be notified of the need to have any connected alarm system tested by authorized fire alarm service personnel in accordance with NFPA 72, Chapter 14 to make certain that all signal transmission features have remained operational after equipment installation. Refer to listee's Installation Instruction Manual for details. Model complies with the applicable requirements in UL 62368-1 (Part 1: Safety Requirements), 2nd Edition.
NOTES:	Examined for fire, shock, and/or casualty hazards only.

(2)

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From: [Ellen McFarland](#)
To: [Joshua Ruby](#); [Jennifer Moreau](#)
Cc: [Parrow, Dylan](#); [Mason, Charles](#); [Wayne D. Moore - Jensen Hughes, Inc. \(wmoorefpe@gmail.com\)](#); ["Dewey"; zachwood1990@yahoo.com](#)
Subject: Re: Granite EPIK - Louisiana State Fire Marshal - follow up to 8/1 discussion
Date: Friday, September 9, 2022 1:37:52 PM

Please be advised that after consultation with NFPA, the previous OSFM statement that the Granite "Epic" device is not part of the building fire alarm system and does not require submittal remains the determination of this office.

As such, testing and coordination with the building fire alarm interface is the building Owner's responsibility to arrange and coordinate.

The system shall interface with the building fire alarm system as described in NFPA 72:A.3.3.152 through a DACT using circuitry and protocols compatible with those used in public switched telephone networks or by means of equipment that emulates the telephone circuit and associated signaling and then transmits signals over a pathway using IP networks or other communications methods that are part of the MFVN as spelled out in this section.

Ellen McFarland, Architect
OSFM, Plan Review
225-485-6754

Granite's substantial interests are affected by the below question because Granite, like other telecommunications carriers, is not a "contractor" and does not install, modify, or alter fire alarm systems. Granite understands that certain local AHJ's may have questions about the EPIK service's qualifications as an MFVN and may require Granite to demonstrate compliance with the MFVN criteria, and Granite will comply with any such local AHJ requirements. However, requiring Granite to comply with NFPA or local fire code provisions regarding modification or alteration of fire alarm systems—a service that telecommunications carriers like Granite do not provide—would unduly restrict the availability of MFVN services like EPIK.

Enter the Petitioner's question concerning an interpretation of the FFPC:

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Given that the Granite EPIK service meets all the requirements and qualification criteria for an MFVN under NFPA 72 and Florida Administrative Code, § 69A-48.008, and that it replaces existing telecommunications equipment (i.e., analog POTS lines) with the EPIK equipment solely on the telecommunications side of the telecommunications terminal block:

Does installation of the EPIK service constitute "modification" or "alteration" of a fire alarm system which falls within an AHJ's authority to require a permit pursuant to NFPA 1, § 1.12.8?

Committee's Answer:

No. If the EPIK service does not modify or alter any fire alarm system equipment and only changes the telecommunication equipment/service, no permit is required as this scope of work is not within the scope of the Florida Fire Prevention Code. However, please note that MFVN must still meet the requirements of NFPA 72 and 69A-48.008 (4) as listed below. As part of this section, the service provider must demonstrate compliance with this (4) via an attestation statement to the AHJ but this does not authorize the AHJ to issue a permit or otherwise regulate compliant MFVNs.

(4) Managed Facilities-based Voice Network (MFVN) is a physical facilities-based communication network that:

(a) Is managed and maintained by the service provider to ensure service quality and reliability from the service subscriber location to the point at which a call is transferred or handed off to another MFVN peer network such as the public switched telephone network (PSTN), defined as a single or an interconnected collection of local, long distance and international phone companies;

(b) Conforms to all relevant PSTN standards with respect to:

1. Dialing;
2. Dial plan;
3. Call completion;
4. Carriage of alarm signals and protocols; and
5. Loop voltage treatment.

(c) Provides real-time transmission of voice and real-time transmission of signals that carry alarm industry standard alarm formats unchanged;

(d) Preserves primary line seizure for alarm signal transmission;

(e) Provides a method of electrical power backup such as a battery that provides a minimum of 8 hours of continued uninterrupted voice service availability to the attached alarm system; and

(f) Provides disaster recovery plans to address individual customer outages and network power restoration procedures. The plans shall be provided to the authority having jurisdiction upon request.

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(5) The service provider must demonstrate that the network is a MFVN, as described in this rule by submitting to the authority having jurisdiction an attestation that the service provider's network meets the criteria in paragraphs (4)(a) through (4)(f), above.

Region 1 - Delegate: Byron Bennett, North Bay Fire Control District
Alternate: William (Michael) Hall, Marianna Fire Rescue

Region 2 - Delegate: Jason R. Greisl, Tallahassee Fire
Alternate: Vacant

Region 3 - Delegate: James Groff, Jacksonville F. R. (Committee Chair)
Alternate: Silver Chip Ware

Region 4 - Delegate: Taylor Riley, Lakeland Fire Rescue
Alternate: Karl Thompson

Region 5 - Delegate: Anthony Apfelbeck, Altamonte Springs Building Department
Alternate: Christina Diaz, Seminole County Fire Department

Region 6 - Delegate: Robert Salvaggio, Cape Coral Fire Rescue
Alternate: Vacant

Region 7 - Delegate: (Kenneth) Sean Brown, Broward Sheriff Fire Rescue & Emergency Services
Alternate: Rebecca Geimer Tamarac Fire Rescue

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