

Comments on NECA 781-201X, Recommended Practice for Installing and Maintaining Lightning Protection Systems

E: editorial, G: General, T: Technical Note: **Please do not re-size table**

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Page	Line	Clause	E/G	Organization	Comment (rationale)	Proposed change (specific; add, delete. From-to)	Resolution (SME ONLY)
			G	GWM	Reconcile section titles in the Table of Contents with section titles in the body of the text. For example, the TOC has Section 1.1 labeled, "Products and Applications Included," while Section 1.1 in the text is labeled, "Included." Additionally, the section title for Section 6.1 appears in the text but is not included in the TOC.	Coordinate section titles between the Table of Contents and the body of the text.	Accept, NECA to perform final editing
			G	GWM	Different paragraphs appear to have different line spacing. For example, Paragraph 1.2(a), lines 170-173, appear to have a different line spacing that Paragraph 1.2(b), lines 175-180.	Coordinate line spacings of text within the body of the Standard for consistency.	Accept, NECA to perform final editing
6	195	1.2(d)	E	GWM	Reference Standards are indicated to be in Annex E. The Table of Contents indicates that Reference Standards are in Annex F. Annex F actually contains Reference Standards.	Correct reference to Annex E to be Annex F.	Accept
7	215	1.3(b)	E	GW	Recommend deleting the second "that" for clarity.		Accept

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43	1119	A.1	E	GWM	<p>Reference to Section 6.2 and Section 6.3 is made for information regarding obtaining inspection certificates from Underwriters Laboratories Master Label Certificate program and the Lightning Protection Institute's Inspection Program.</p> <p>Section 6.2 of the Standard addresses Ground Test Methods and Section 6.3 does not exist in the Standard.</p>	<p>Coordinate the references in Section A.1 with the appropriate Sections within the Standard, which appear to be Section A.2 and A.3 of Annex A.</p>	Accept
43	1158-1159	A.2.1	E	GWM	<p>Reference is made to "a LPI-IP professional engineer certified as an LPI Master Installer Designer," which implies LPI plays a role in the certification or registration of professional engineers.</p>	<p>Recommend deleting "LPI-IP" prior to "professional engineer" in the text to more appropriately indicate the requirement that a professional engineer has an additional certification as an LPI Master Installer Designer.</p>	Accept
45	1263	B	E	GWM	<p>Does Annex B contain a complete reprint of MasterFormat Specification Section 264113 from CSI? If so, Annex B should contain the citation and indicate permission to reprint.</p>		<p>Resolve (Not Accepted) No, CSI outlines the layout and format of specification sections. CSI does not create "master specs". SME formatted this document.</p>
21	603-609	5.4	T	Bonded LPS Texas & ALT Fabrication	<p>There is no measurement listed for ground rods</p>	<p>Ground rods should be 1' below grade and at least 2' from foundation</p> <p>*We listed this in the last comment and no change</p>	Accept

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			G	Bonded LPS Texas & ALT Fabrication	Why is NECA developing this standard for conventional lightning protection systems? Why can installing contractors not utilize the three existing standards that are common with each other and this document?	Document is not needed and can be deleted. *We listed this in the last comments and no response. Please respond to this comment.	<p>Resolve (Not Accepted) – This new document is being developed as a “Recommended Practice” not a “Standard.” It describes various aspects of lightning protection system installations from a Good Workmanship perspective. Section 1.5.1 of NFPA 780 states “Lightning protection systems shall be installed in a neat and workmanlike manner.” A mandatory requirement in the NFPA standard that contains minimum requirements for safe installations, but nothing in the standard ever tells one how to accomplish Good Workmanship” . That is the whole purpose of the National Electrical Installation Standards (NEIS) program, to describe what constitutes “Good Workmanship” in the various aspects of these systems. NECA developed the NEIS program in the early 1990s to address this gap in the NEC and other standards that require good workmanship and never describe it.</p> <p>Previous response indicated the following:</p> <p>This comment is irrelevant to the development of this Quality and Workmanship recommended practice. No suggestions of technical, editorial, or general revisions were provided by the submitter(s). NECA has followed the ANSI requirements relative to the Project Initiation Notification System (PINS) to the public and other standards development organizations with no objections received. This quality and workmanship recommended practice is not intended to</p>
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6	180	1.2 & throughout	T	Bonded LPS Texas & ALT Fabrication	Why is the NFPA780 and LPI standards being removed and just stating nationally recognized lightning protection and electrical standards. This is too vague.	Keep the specific standards listed in the entire document where referencing.	Resolve (Not Accepted), references to standards were moved into the Annex to address conflicts between existing standards.
14-15	460-461	Figures 4.3.1	T	Bonded LPS Texas & ALT Fabrication	Drawing should not call out for a specific certification - UL Lightning Protection Inspection Certificate Requirements	Third Party Lightning Protection Certification	Accept
19	538	5.1	T	Bonded LPS Texas & ALT Fabrication	Why is the electrical grounding being addressed in the lightning protection standard?	This needs to be address in a specific project scope of work or specification.	Resolve (Not Accepted), Section 5.1 discusses the importance of good workmanship and provides examples.
60	1849 & 1505	3.2	T	Bonded LPS Texas & ALT Fabrication	Why is Corrosion Protection in the lightning protection specification? This is not generally included in lightning protection contractor's scope of work and will cause major confusion.	Remove 3.02 Corrosion Protection from the specification. Also remove "cathodic protection" on line 1505.	Accept
8	246	Definitions	E	LPI	NFPA 780 has no approval process. I believe the "[NFPA 780]" is a reference to the location of the definition, but this is misleading.	Delete – [NFPA 780]	Resolve (Not Accepted), bracketed references are a standard citation method.
9	282	Definitions	E	LPI	NFPA 780 has no approval process. I believe the "[NFPA 780]" is a reference to the location of the definition, but this is misleading. Inspection is normally performed by UL or another NRTL in accordance with the UL 96 component standard.	Delete – [NFPA 780]	Resolve (Not Accepted), bracketed references are a standard citation method.

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9	293	Definitions	E	LPI	Again NFPA 780 has no approval process. I believe the "[NFPA 780]" is a reference to the location of the definition, but this is misleading.	Delete – [NFPA 780]	Resolve (Not Accepted), bracketed references are a standard citation method.
20	565	5.2 Installation methods & criteria	T	LPI	The requirement for a minimum of 2 down conductors is here, but I don't see the requirement for downloads at 100 ft. average intervals on the protected perimeter anywhere. There also needs to be a reference to 100 ft. intervals on the footprint of ridged roof structures. See NFPA 780 section 4.9.10.	Add all paragraphs from NFPA 780 4.9.10 section, including 4.9.10.2 & 4.9.10.5 in particular.	Accept
22	623	5.4 Ground electrode installation & bonding	T	LPI	Cutting off the top of a ground rod is a questionable if necessary practice. You need to warn that you can't cut the top off an 8 ft. long rod or it won't meet the materials requirement. You also couldn't cut the top off of a rod that extends only 10 ft. into the earth, or it wouldn't meet the minimum depth requirement.	Add NFPA 780 paragraph 4.13.2.1 for minimum ground rod size and NFPA 780 paragraph 4.13.2.3.1 for depth of ground rods.	Accept
76	2291	Annex F Reference standards	E	LPI	The most current edition of LPI 175 is the 2017 edition.	LPI-175 (2017)	Accept

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All	All	Entire document	T	LPI	<p>We have pointed to a few areas lacking in this document according to the standards, and there may be more.</p> <p>It makes no sense to have an additional document with technical problems that requires constant updating.</p>	<p>Resolve (Not Accepted) –</p> <p>This new document is being developed as a “Recommended Practice” not a “Standard.” It describes various aspects of lightning protection system installations from a Good Workmanship perspective. Section 1.5.1 of NFPA 780 states “Lightning protection systems shall be installed in a neat and workmanlike manner.” A mandatory requirement in the NFPA standard that contains minimum requirements for safe installations, but nothing in the standard ever tells one how to accomplish Good Workmanship” .</p> <p>That is the whole purpose of the National Electrical Installation Standards (NEIS) program, to describe what constitutes “Good Workmanship” in the various aspects of these systems. NECA developed the NEIS program in the early 1990s to address this gap in the NEC and other standards that require good workmanship and never describe it.</p> <p>Previous response indicated the following:</p> <p>This comment is irrelevant to the development of this Quality and Workmanship recommended practice. No suggestions of technical, editorial, or general revisions were provided by the submitter(s).</p> <p>NECA has followed the ANSI requirements relative to the Project Initiation Notification System (PINS) to the public and other standards development organizations with no objections received.</p> <p>This quality and workmanship recommended practice is not intended to</p>
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All			E	HLP	I like the document, but it is not needed in the construction industry. NFPA 780 is the ANSI Standard. NECA 781 is more of a handbook.		<p>Resolve (Not Accepted) – This new document is being developed as a “Recommended Practice” not a “Standard.” It describes various aspects of lightning protection system installations from a Good Workmanship perspective. Section 1.5.1 of NFPA 780 states “Lightning protection systems shall be installed in a neat and workmanlike manner.” A mandatory requirement in the NFPA standard that contains minimum requirements for safe installations, but nothing in the standard ever tells one how to accomplish Good Workmanship” . That is the whole purpose of the National Electrical Installation Standards (NEIS) program, to describe what constitutes “Good Workmanship” in the various aspects of these systems. NECA developed the NEIS program in the early 1990s to address this gap in the NEC and other standards that require good workmanship and never describe it.</p> <p>Previous response indicated the following:</p> <p>This comment is irrelevant to the development of this Quality and Workmanship recommended practice. No suggestions of technical, editorial, or general revisions were provided by the submitter(s). NECA has followed the ANSI requirements relative to the Project Initiation Notification System (PINS) to the public and other standards development organizations with no objections received. This quality and workmanship recommended practice is not intended to</p>
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			G	Mitchell Guthrie	There are a number of comments to the last revision that were agreed according to the resolutions published but are not included in the circulated draft. The changes must be incorporated before approval of the draft for publication.		Accept
5	121-122	Foreword	T	Mitchell Guthrie	In the previous revision comments, it was identified that the text in this paragraph was in conflict with committee statements that the whole purpose behind the National Electrical Installation Standards (NEIS) is to provide information on how industry standards can specify that systems be installed in a manner that is neat and workmanlike and not to identify installation and maintenance requirements. The resolution to the comment agreed and recommended that the existing text be revised as in the proposed change here. However, the change was not made in the revised text in the document under review.	Replace existing text with: “The quality of workmanship for lightning protection system installations and maintenance operations shall be in accordance with the Recommended Practice for Installing and Maintaining Lightning Protection Systems (ANSI), NFPA 781.”	Accept
6	166-167	1.1	E	Mitchell Guthrie	The resolution of a previous comment agreed to change “basic” to “fundamental” in 2 places, but the changes were not made.	Change the last sentence of 1.1 as below: “The basic <u>fundamental</u> components of lightning protection systems are covered as well as basic <u>fundamental</u> information related to lightning protection ...”	Accept
6	182-185	1.2(c)	E	Mitchell Guthrie	A word is missing from the sub-clause. It is suggested it be separated into 2 sentences as proposed.	(c) Surge Protective Devices. Installations of surge protective devices (SPDs) are covered by NFPA 70, National Electrical Code and NFPA 70E, Standard for Electrical Safety in the Workplace (ANSI). They shall be installed by qualified persons and shall be in accordance with the applicable provisions of the NEC and NFPA 70E.	Accept

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11	367	4.	G/T	Mitchell Guthrie	<p>Given that the focus of this document is on workmanship and not design and installation requirements, I question the level of detail in Section 4. If the focus of the document is not on workmanship, it has no place as an ANSI recommended practice. There is already a well-established ANSI standard on lightning protection system design and installation; NFPA 780.</p> <p>I do not suggest that this recommended practice should not provide some background information on lightning protection fundamentals or the purpose of lightning protection but as the Section moves to design (4.3) and components (4.4) there could be the tendency to drift into requirements, especially in future revisions.</p>	<p>Ensure that this Section is limited to general information and does not venture into design and component specifications. Mandatory requirements should not be included in Figures. (See comment below on Figure 4.3.1)</p>	Accept
12	404-407	4.3	G	Mitchell Guthrie	<p>In the previous revision comments, it was recommended that instead of the negative spin of the text, the focus be on suggesting that the design information could have changed and should be confirmed. The resolution was accepted but the change has not been implemented.</p>	<p>Change</p> <p>“Generally, it is not advisable to rely on the lightning protection design information provided with the original set of plans. It is quite common that the information provided at the time of the original design may have altered significantly especially as they relate to items on the rooftop.”</p> <p>To</p> <p>“It is advisable to confirm the lightning protection design information provided with the original set of plans as it is common that the information provided at the time of the original design may have altered significantly, especially as they relate to items on the rooftop.”</p>	Accept

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13	408	Figure 4.3.1	T	Mitchell Guthrie	<p>In a previous comment on Section 4, it was suggested that Section 4 should be limited to fundamental descriptions and the purpose of lightning protection, but not provide requirements for design and components. Figure 4.3.1 provides mandatory text even though it's caption is "Sample shop drawings building top view and details." Each of the Notes use the word "shall" even though the figure is referenced as an example. This is misleading and could be interpreted to be a requirement.</p> <p>It is recommended that Figure 4.3.1 be deleted. The resolution to a previous comment to delete the figure was accepted but the figure remains. Design is not a workmanship issue so the figure is not necessary.</p>	Delete Figure 4.3.1 and revise text accordingly.	Accept
14	410	Figure 4.3.2	T	Mitchell Guthrie	<p>Figure 4.3.2 also contains requirements giving maximum spacings and in some cases identifying sizes greater that required by NFPA 780. This Figure should also be deleted, as indicated in comments to the previous draft, or the source of the values cited should be identified. At minimum, a note should be included to clarify that the information is an example and other solutions may be used. In Air terminal detail B, the arrow identifying the AT base does not point to the base.</p>	Delete Figure 4.3.2 and revise text accordingly. Correct Air terminal detail B	Accept

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14	428-429	4.4.1	T	Mitchell Guthrie	Resolution of a comment on this paragraph in V9 indicating other materials such as stainless steel are acceptable was accepted but is not included in the text of V10.	Revise the 1 st sentence of the clause as follows: “Strike termination devices may consist of air terminals manufactured from copper, electro-tin plated copper, and aluminum <u>or other approved materials.</u> ”	Accept
15	445-446	4.4.6	T	Mitchell Guthrie	A comment on the 1st sentence of the clause recommending changing “strike” to “current” was accepted but the change has not been made.	Revise the 1 st sentence of the clause as follows: “Grounding electrodes provide the point at which the lightning <u>current</u> strike is dissipated into the earth.”	Accept
16	477	5.2	T	Mitchell Guthrie	The existing wording infers it is optional for a strike termination device to have 2 paths to ground. Two ways paths are required for all cases with a few exceptions. The text should be changed to reflect this.	Revise the first sentence as follows: “ <u>ANSI-certified lightning protection standards require that</u> strike termination devices should be provided with two paths to the ground.	Accept
16	483-484	5.2	T	Mitchell Guthrie	In the previous review, it was agreed to revise the sentence as proposed but the change was not made in V10. It is not the voltage associated with the discharge process that is important but instead is the voltage on the down conductor resulting from the partial lightning current flowing through the impedance to earth of the conductor.	If the voltage of <u>on a down conductor resulting from</u> a strike exceeds the breakdown voltage of <u>the</u> air space between a down conductor and another conductive object, a side flash can occur during a lightning strike.	Accept
17	521	5.4	T	Mitchell Guthrie	It is important that the Ground Access Well be selected according to the expected load that may be experienced (personnel, light vehicle, etc.). This comment was accepted during the previous review, but the change has not been made.	Add a new paragraph/sentence to address sizing of the ground access well to the expected loads: “ <u>Ensure ground access wells are related to support the loads encountered, personnel, light vehicle, etc. See ANSI/ SCTE 77 2010, Specification for Underground Enclosure Integrity.</u> ”	Accept

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18	528-529	5.4	T	Mitchell Guthrie	In the previous review it was recommended and agreed that a reference to the 2-foot spacing requirement of NFPA 780 should be added at the end of the sentence. The draft reviewed does not incorporate the agreed change.	Revise the last sentence as follows: “In this case, the ground rods should be installed as close to the building’s walls as practical without damaging the footing <u>while maintaining the 2’ separation recommended by NFPA 780.</u> ”	Accept
20	572	5.4.4	G	Mitchell Guthrie	Reference to Figure 8.4.4-2 and the figure itself has been removed but the caption remains.	Delete caption “Figure 5.4.4-2 Intersystem bonding termination device” Renummer the remaining figures accordingly.	Accept
23	628-630	5.5.1	T	Mitchell Guthrie	Electrical testing of connectors in accordance with the requirements of IEC 62561-1 indicates significant forces at the connector when there are bends near the connector.	Revise the sentence as below: It is good practice to add additional fasteners at bends in the conductors, <u>especially those near connectors</u> , because of the large mechanical forces that occur when conducting lightning currents.	Accept
24	647	5.5.1	T	Mitchell Guthrie	The paragraph covers protection against grass cutting and other physical damage at the ground level but does not include the requirement that down conductors located in runways, driveways, school playgrounds, cattle yards, public walks, or other locations subject to physical damage or displacement shall be guarded. The down conductor shall be protected for a minimum distance of 1.8 m (6 ft) above grade level.	Add the following after the existing text: “Down conductors located in runways, driveways, school playgrounds, cattle yards, public walks, or other locations subject to physical damage or displacement shall be guarded. The down conductor shall be protected for a minimum distance of 1.8 m (6 ft) above grade level.”	Accept
34	827-831	5.7.1	T	Mitchell Guthrie	The resolution of the original comment provided a reference to Chapter 4 of NFPA 780 for zone of protection requirements.	Add the following sentence to the end of the existing paragraph: “Refer to Chapter 4 of NFPA 780 for design requirements for zone of protection.”	Accept
36	886-887	5.8	E	Mitchell Guthrie	Delete “from.”	Other means may need to be taken for protecting internal electrical and electronic systems from against lightning electromagnetic pulses.	Accept

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37	888-890	5.8	T	Mitchell Guthrie	The previous comment matrix agreed that the potential equalization cannot be achieved by separation and the text should be in a bonding section rather than under SPDs. It was agreed that the text should be deleted but it is included in this draft.	Potential equalization can be achieved at electrical service by bonding to down conductors and ground loop conductors as required, installing suitable listed surge protective devices and separation by space or distance.	Accept
41	1063	6.2.1	E	Mitchell Guthrie		Delete line space	Accept, NECA to perform final editing
41	1071	6.2.2	E	Mitchell Guthrie		Delete line space	Accept, NECA to perform final editing
42, 43	1116-1119	A.1	T	Mitchell Guthrie	This clause incorrectly cites Sections 6.2 and 6.3 for information on the UL and LPI-IP certification programs. Section 6.2 relates to Ground Testing Methods and there is no 6.3. It is assumed that the proper citations are A.2 and A.3. If this is true, the order of the listing should be changed to match the first to appear in the list to be A.2.	Revise A.1 as follows: "This section provides information about lightning protection system conformity to applicable design and installation standards. Information about obtaining inspection certificates from Underwriters Laboratories Master Label Certificate program and the Lightning Protection Institute's Inspection Program and Underwriters Laboratories Master Label Certificate program are provided in Sections 6.2 A.2 and A.3 6.3 .	Accept
44	1186	A.3	T	Mitchell Guthrie	The Master Label Certificate was originally designed for certification to UL 96A and is still applicable to that standard. Add UL 96A to NFPA 780.	Revise the 4 th sentence as follows: "For the purposes of this standard, it means that the system is in compliance with NFPA 780 <u>or UL 96A</u> .	Accept
45	1228	A.3.3	E	Mitchell Guthrie	Add a space between the section number and title.	A.3.3 Post UL Inspection Documents	Accept
46	1263	Annex B	E	Mitchell Guthrie	Editorial correction identified during last review has not been made.	Revise Title as follows: LIGHTNINGLIGHTNINGLIGHTNINGSECTION 26 41 13	Accept
47	1305	B.1.06.A.2	T	Mitchell Guthrie	Installer Qualifications should identify LPI certified designers and installers.		Resolve (Not Accepted), inclusion of the designer & installer qualification would give preference to a trade organization.
49	1469-1470	Annex C	T	Mitchell Guthrie	NFPA 780 allows the use of a minimum 8-foot ground rod driven to a depth of 10 feet.	Revise the text as follows: Confirm soil conditions are such that the 3.0 m (10 ft) long ground rods can be driven to a vertically depth of 3.0 m (10 ft) into the earth	Accept

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50	1394-1395	Annex C	T	Mitchell Guthrie	What is the reference for this requirement? This should not be an item on the checklist if it is not a mandatory or it should be identified that unlike the other items on the checklist, it is only a suggestion.	Confirm roof penetrations for down conductors are proper type and size for roof construction and will not extend more than 225 mm (9 in.) above roof.	Accept
51	1437-1438	Annex C	T	Mitchell Guthrie	The specified spacing is valid for air terminals 10 inches above the protected areas. Air terminals 2 ft above the protected area can be spaced at 25 ft intervals.	Confirm spacing of air terminals at the perimeters of roofs and rooftop objects does not exceed <u>allowable spacing based on height of air terminals (for example 6.0 m (20 ft) for 250 mm (10 in.) above protected area, 7.6 m (25 ft) for 0.6 m (2 ft) above protected area, etc.)</u> to meet requirements in applicable mandatory standards.	Accept
55	1528	Annex D	T	Mitchell Guthrie	What is the reference for this requirement? This should not be an item on the checklist if it is not a mandatory or it should be identified that unlike the other items on the checklist, it is only a suggestion.	Confirm that thru-roof assemblies are no more than 225 mm (9 in.) above the roof.	Accept
55	1545-1546	Annex D	T	Mitchell Guthrie	The specified spacing is valid for air terminals 10 inches above the protected areas. Air terminals 2 ft above the protected area can be spaced at 25 ft intervals.	Confirm spacing of air terminals at the perimeters of roofs and rooftop objects does not exceed <u>allowable spacing based on height of air terminals (for example 6.0 m (20 ft) for 250 mm (10 in.) above protected area, 7.6 m (25 ft) for 0.6 m (2 ft) above protected area, etc.)</u> to meet requirements in applicable mandatory standards.	Accept