



GAMA-An Association of Appliance & Equipment Manufacturers

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Product Divisions and Groups

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Furnace
Gas Air
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Gas Appliance
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Gas Detector
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Institute
Industrial Forced-
Air Heating
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Vent Free Gas
Products
Water Heater

July 22, 2005

Michael J. Pfeiffer, P.E.
International Code Council, Inc.
Vice President, Codes & Standards Development
4051 West Flossmoor Road
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Mr. Pfeiffer:

It has come to our attention that one of the items to be discussed at the July 25-26 meeting of the ICC Code Technology Committee is the use of carbon monoxide (CO) alarms in residential type occupancies. We would like the Committee to know that GAMA supports the installation and use of CO alarms in all buildings in the United States. The CO alarms should:

- Be listed to ANSI UL 2034, *Standard for Single and Multiple Station CO Alarms* or CSA 6.19, *Residential Carbon Monoxide Detectors*.
- Be installed according to NFPA 720, *Standard for the Installation of Carbon Monoxide (CO) Warning Equipment in Dwelling Units*.
- Have battery backup to operate during power outages.

There are many contributors to the potential hazard posed by CO. Most people recognize fuel-fired heating appliances as a possible source of CO. Fewer people are aware of the other contributors to this potential hazard that are often brought into the home: charcoal grills, camping stoves, portable gasoline-powered generators (often used during power outages), and engine powered tools. Another source of CO is the exhaust fumes from automobiles left running in attached garages where CO can seep into the living areas of the home. In the Consumer Product Safety Commission's (CPSC) report on non-fire CO deaths for the years 1999 to 2001, nearly half of the non-fire, accidental CO fatalities were associated with some source other than the heating systems in the home. Because there are such varied potential sources of CO, GAMA believes that the most effective way to address this hazard is to require CO alarms in all buildings, not just homes with gas or oil fired appliances.

The standards for residential CO alarms have changed in recent years. Those changes have improved the reliability and performance of those products. Those changes are one of the reasons GAMA's position on CO alarms has evolved to the current one presented herein. As with all product standards, GAMA will continue to support further revisions to the CO alarm standards to reflect the state of the art.

The information contained in this document is confidential and intended for the private and exclusive use of members of GAMA. The information is not to be provided to any other person not employed by a GAMA member company without the prior, express written permission of GAMA. Thank you for your cooperation.

July 22, 2005
Page 2

Although GAMA is unable to have a staff member attend the CTC meeting, Wendy Gifford, Invensys Controls North America, will be in attendance. As Invensys is a member company of GAMA, she may be able to clarify GAMA's position should the Committee have questions on the day of the meeting. Should you have any other questions or if GAMA can be of any assistance to the Committee, please do not hesitate to contact me at 703.525.7060 ext.231 or at btudor@gamanet.org.

Respectfully,

Brandon Tudor
Manager, Technical Services