



October 23, 2008

International Code Council
500 New Jersey Avenue, N.W.
Sixth Floor
Washington, D.C. 20001

Dear Members of the International Code Council:

On behalf of Safe Kids USA, I write to urge you to **oppose** four proposed changes to the 2009/2010 codes:

- **RB 56 & RB 57** – deleting a requirement for fire sprinklers in new townhouses and one- and two- family dwellings,
- **RB 60** – deleting a requirement for carbon monoxide alarms in new construction or when work requiring a permit occurs in existing dwellings with attached garages or with fuel-fired appliances, and
- **F 112** – amending the code to state that all smoke alarms required by the code be photoelectric alarms.

Sprinklers

Safe Kids opposes RB 56 & RB 57, which would delete a requirement in the IRC for fire sprinklers in new townhouses and one- and two- family dwellings.

Safe Kids strongly supports the use of fire sprinklers as a proven intervention to keep kids safe from fires. Each year, approximately 500 children ages 14 and under die due to unintentional fire- and burn- related injury and fires and burns are the third leading cause of unintentional death among children ages 1-14.

Home sprinkler systems decrease the risk of dying in a fire by approximately 80 percent. While smoke alarms provide a warning that allows many people sufficient time to escape a fire, infants and young children (along with the elderly and people with special needs) may not be able to escape when an alarm sounds. It is no coincidence that those are the very groups that are at the highest risk of death in a home fire. In fact, children under age 5 are one and a half times as likely to die in a home fire as the general public. By actually *extinguishing* the fire, as opposed to just detecting the fire, sprinklers are able to better protect these particularly vulnerable populations and the general public at large from fire-related injury and death. The presence of both sprinklers and smoke alarms provides the best protection during a fire.

Carbon Monoxide Alarms

Safe Kids also opposes RB 60, which would delete a requirement in the IRC for carbon monoxide alarms in new construction or when work requiring a permit occurs in existing dwellings with attached garages or with fuel-fired appliances.

Safe Kids has long been a proponent of carbon monoxide (CO) alarms as a way to prevent the potentially fatal effects of CO poisoning, which is responsible for more than 500 unintentional deaths and approximately 15,000 emergency department visits each year. Young children are especially vulnerable to the effects of CO. Children process CO differently than adults and may be more severely affected by carbon monoxide in their blood. From 1999-2004, 135 children ages 14 and under died from unintentional, non-fire related CO poisoning.

The single most effective safety device available to reduce injuries and fatalities related to carbon monoxide poisonings is a CO alarm. A CO alarm in the home can give families a sufficient warning when concentrations of carbon monoxide reach dangerous levels. It is estimated that CO alarms may prevent half of such related deaths from occurring. Accordingly, the ICC should make every effort to continue to include this important safety device in the IRC.

Smoke Alarms

Finally, Safe Kids opposes F 112, which would amend the IFC, IRC and IBC to state that all smoke alarms required by the code be photoelectric alarms.

Safe Kids urges the ICC to keep flexibility in the marketplace and promote the use of both photoelectric and ionization smoke alarms. The code should allow for either kind of device to be used. We understand that each type of device better addresses a different type of fire, so the code should not require one over the other. In fact, the best code should require both.

We appreciate your consideration of these recommendations. If Safe Kids can be of any assistance to you, please do not hesitate to contact me at (202) 662-4463 or Stephanie Russell, Public Policy Associate, at (202) 662-0608.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping, slanted lines that form a stylized, somewhat abstract shape.

Alan Korn
Executive Director