



Wiring Systems

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Request for Appeal

To: Casey C. Grant
Secretary of the Standards Council NFPA
Leona Attenasio Nisbet
Recording Secretary

From: John Goodsell, P.E.
Hubbell Incorporated
NFPA Member # 000144791

Subject:

Technical Committee Report Session of the 2004 May Association Technical Meeting.
NFPA 70 National Electric Code - CMP Panel 2

Action to Appeal

Floor amendment to accept Comment 2-91, Log No. 510 (Original Proposal 2-140)

This amendment expands the application of AFCI's in dwelling units to all living areas.

NOTE: This request for appeal is contingent on the subsequent Code Panel 2 ballot and the action of the TCC.

- o If they support the floor amendment then I wish to file this appeal.
- o I assume, per NFPA regulations, that if the amendment fails to receive approval it is automatically docketed as an appeal to the Standards Council. In this case I respectfully request the opportunity to address the Standards Council to express my support for the rejection of the amendment.

Substantiation for Appeal

As the decision and the rationale of the Code Panel will not be known until after the deadline for filing the appeal, my argument is based on current information and personal experience.

- o There is significant possibility for nuisance tripping if the devices are expanded throughout the household. I have concerns regarding interference and accumulated leakage currents from a wide variety of electrical and electronic appliances and other devices used throughout a typical home. I have first hand experience as I currently live in house with AFCI protection on ALL Branch circuits (excluding furnace). Nuisance tripping is a reality with current technology.
- o Based on my familiarity with nuisance tripping issues in GFCI's in the 70's and early 80's, I will argue that the technical success and public acceptance of both technologies will follow a similar path of trial and error and phased implementation..
- o CMP 2 overwhelmingly rejected this proposal citing lack of real world experience data. Much anecdotal evidence has been presented regarding electrical fires with outrageous and unsubstantiated claims that AFCI's would have prevented them. These claims have not and probably cannot be scientifically proven. In fact evidence has been presented where AFCI devices did not trip until after a fire had started. Factual evidence is necessary to verify the real world performance of AFCI's.
- o The acceptance of this amendment would negate the work of CMP 2 to implement the use of "Combination" AFCI devices in the 2008 NEC that will offer protection beyond the branch circuit wiring to power and extension cords. As proposed this amendment is confusing as it references all living areas but is under the sub heading of bedrooms.

04-7-1a-3 P.2

- o After details of the Panel 's decision are published I would be pleased to refine my appeal based on the facts.

Recommendation

I believe the expansion of the application of AFCI devices is inappropriate at this time and that CMP2's original decision to gather more data was correct. CMP 2 spent considerable time considering the facts on this subject before reaching a decision. No new information was presented to the Association and the floor vote appeared to be a reflection of emotion, rather than facts.

My recommendation is to reject the amendment and not expand the use of AFCI's in the 2005 Code to all living areas.

Sincerely

John Goodsell