

**From:** [noreply@formstack.com](mailto:noreply@formstack.com)  
**To:** [Fire Prevention and Building and Safety Commission](#)  
**Subject:** Code Comments, Proposals and Advice  
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## Formstack Submission For: **4202**

Submitted at 05/28/21 7:12 PM

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<b>Indiana Code You Are Commenting On:</b>	2014 Indiana Fire Code

Due to the continued deuteriation of the phone service partially the VOIP(voice over IP) service we are experiencing escalating Failed communication alerts from our central station indicating the alarm signals are not getting through. Current Indiana code IAC675 Article 28 page 48 modifies the Adopted 2010 NFPA 72 code to eliminate single path communication. Currently the most popular and economical pathway is cellular and the second is IP pathway. IP stills requires a fiber or copper connection to work, whereas cellular does not. It has come to my attention that alarm company's are being given verbal permission by the AHJ to use cellular path as the only pathway due to the

**Comment or  
Proposal:**

amount of failures of the current phone service. Just this week we had a system sending a test signal and the VOIP service scrambled the transmission and went to an another account in another town and was interpreted as a fire alarm causing an unnecessary fire run at 3am in the morning , the current phone service can no longer be trusted. The problem is that even though we are being given permission to use a single path we are in violation of the Indiana Fire Code with the greater threat being should an incident occur where there is a major loss of property or life where an investigation is perused I can assure you they will look at any infraction regardless of the systems performance or the lack thereof. It comes down to liability of the company not being in compliance of the code along with the AHJ that allowed it. I believe that single path communication must be included in the Indiana Fire Code.

Frank Rhoades

**File:**

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*Critical Condition Alarm Monitoring Specialists.*

I am Frank Rhoades; President of E.F. Rhoades & Sons Inc. DBA Cottage Watchman Security Systems.

Our Company has been involved in sales and service of the electronic side of the fire alarm industry for over 30 years. We provide alarm monitoring services in which Indiana Fire Code requires the use of a phone line and one alternate technology, (cellular, IP, Long range radio). It is becoming more difficult to get regular (POTS -plain old telephone service) and in most all commercial applications the phone service is VOIP (phones that work directly over the internet) Please note these articles, <https://www.moneytalksnews.com/landline-phone-disappearing-in-these-20-states/> <https://www.ooma.com/blog/are-copper-phone-lines-going-away/>

Note that these VOIP phones are using the internet to communicate. A typical fire communicator using a phone line to transmit its signals to a monitoring station will use tones to “talk” into the phone line, when VOIP is used there is a conversion the changes it into data, it is then sent over the internet then converted back to voice technology for the alarm receiver to take it. It needs to be known that there has been and are times that the conversion process does not pass our fire signals due to some carriers trimming down the signals to push more data through. The Cellular And IT fire communicators use a data format from point to point eliminating the conversion process, it is a cleaner, faster and more dependable way to transport the fire signals.

The NFPA 72 2010 Fire Code that Indiana adopted has a provision in it to allow for a single path data communication to the monitoring company. The single path language used in this code requires whatever single path technology that is used, must notify someone within 5 minutes when that pathway go down. (NFPA 72 2010 26.6.3.1.4.1) It should be noted that in the next NFPA code cycle 2013, that the notification delay was increased to 60 minutes and remains in place in the most recent 2019 NFPA 72 code.

The 675 IAC28-1-28 NFPA 72 - 23.21.3 item yyyyyy on page 48 references NFPA 72 (26.6.3.1.4.1) to delete without substitution modifies this code rule. This removes the ability to utilize single path communications. If this was rule was amended to remove it, then the language in the NFPA 72 2010 would allow single path communication. The result would bring about a less costly, faster and reliable form of fire alarm communication.

We have been using cellular communication devices along with a POTS (conventional) phone line, and have found the cellular path to be very reliable and much faster than the traditional phone service. In our area (Warsaw, In.) a business phone line can run \$75.00 and up per month. The single path communication whether it is cellular or IP (internet) typically runs half of that or less, depending on the company and their location.

There are several manufactures that are producing a single path commercial fire rated LTE cellular communicators and are being used in states that have adopted single path. Due to the rapidly developing secure technology and the increasing difficulty in getting regular phone service, I would request a hearing on this subject to see if these changes can be made.

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