



October 29, 2021

Via Email

Joseph C. Borelli

Chair of the Committee on Fire and Emergency Management

New York City Council

2955 Veterans Road West, Suite 2

Staten Island, NY 10309

Dear Mr. Borelli:

The Alliance for Telecommunications Industry Solutions (ATIS) Sustainability in Telecom: Energy and Protection Committee (STEP) is writing to urge the Fire Department of the City of New York and the New York City Department of Buildings to collaborate with the telecommunications industry to ensure that the amended New York City Fire Code does not negatively impact the reliability and availability of communications networks. To this end, ATIS STEP would welcome the opportunity to work with the City to address specific concerns regarding telecommunications standby power plants.

ATIS is a leading developer of standards and other technical deliverables for Information and Communications Technology (ICT) and Services companies. ATIS develops standards on a broad range of important issues, including 5G and the Internet of Things (IoT). Industry subject matter experts work collaboratively in ATIS' open industry committees, such as STEP. ATIS STEP develops standards and technical reports for telecommunications equipment and environments in the areas of energy efficiency, environmental impacts, power, and protection, including:

- *ATIS-0600307.2018 Fire Resistance Criteria – Ignitability Requirements for Equipment Assemblies, Ancillary Non-Metallic Apparatus, and Fire Spread Requirements for Wire and Cable*
- *ATIS-0600330.2018 Valve Regulated Lead Acid Batteries Used in the Telecommunications Environment*
- *ATIS-0600003.2018 Battery Enclosure and Rooms/Areas*

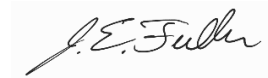
ATIS STEP understands that the City of New York is revising its Fire Code and that the revised code will, among other things, regulate new energy storage systems, such as those based on lithium-ion batteries, within New York City. STEP is concerned that the proposed revisions could negatively impact the use of telecommunication battery plants which have a long history of safe operation. These low voltage battery plants provide safe and highly reliable backup power to the vital telecommunications infrastructure. Such deployments have been granted special consideration in model building and fire codes so that network reliability is not negatively impacted.

Instead of evaluating telecom battery plants under the New York City Fire Code, ATIS STEP believes that lead-acid and nickel-cadmium batteries utilized within telecommunications power plants should continue to be considered telecommunications equipment. Therefore, these plants should be evaluated solely under the NFPA 76 *Standard for the Fire Protection of Telecommunications Facilities*.

ATIS STEP urges Fire Department of the City of New York and the New York City Department of Buildings to ensure that the amended New York City Fire Code does not negatively impact the reliability and availability of communications networks. Telecommunications carriers have historically collaborated closely with the Fire Department of the City of New York to establish installation requirements specific to telecommunications battery plants within the city. Such past collaboration has helped assure the safety of telecommunications equipment installations, including necessary standby batteries, without eroding essential network reliability.

If there are any questions or you would like additional information, please do not hesitate to contact the undersigned.

Respectfully,

A handwritten signature in black ink, appearing to read "J.E. Fuller". The signature is written in a cursive style with a horizontal line underneath.

John Fuller – ATIS Sustainability in Telcom, Energy and Protection Committee (STEP) Chair and ATIS STEP Network Power Systems Vice Chair

A handwritten signature in black ink, appearing to read "E. Gallo". The signature is written in a cursive style with a horizontal line underneath.

Ernie Gallo – ATIS Sustainability in Telcom, Energy and Protection Committee (STEP) Vice Chair and ATIS STEP Network Power Systems Chair