

RESIDENTIAL FIRE SAFETY INSTITUTE

"FIRE SAFETY FOR HOMES TO HIGH-RISES"

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✦ Operation Life Safety ✦
Flagship program of the RFSI

September 14, 2005

Mr. Mike Pfeiffer, PE
VP, Codes & Standards Development
International Code Council
4051 West Flossmoor Rd.
Country Club Hills, IL 60478

Dear Mr. Pfeiffer:

It is my understanding that the Code Technology Committee (CTC) of the International Codes Council (ICC) has taken the position that there is not sufficient justification to require carbon monoxide (CO) protection in either new or existing homes. The Residential Fire Safety Institute believes that every home should be protected by these devices and would like the CTC to consider the following:

- Carbon monoxide poisoning is the number one cause of poisoning deaths in America. (Journal of the American Medical Association.)
- The Centers for Disease Control estimated there were 500 unintentional, non-fire related deaths from CO annually between 2001 and 2003 and 15,200 people treated. These numbers are derived from emergency room visits. Most (64%) of exposures occurred in homes. That would suggest that CO poisoning in the home causes more than 9,700 injuries and 307 deaths a year. This means for every death, there are 31 injuries (Source: Unintentional Non-Fire Related CO Exposures -- United States, 2001-2003, *MMWR Weekly*, January 21, 2005, 54(2):36-39). As a comparison, the National Fire Protection Association's *Fire Loss in the United States in 2004* document shows a ratio of roughly 4.4 injuries for every death in residences. Because CO injuries can have long-term consequences, they should be considered in any evaluation of the need for CO protection in the home.
- Unlike other dangers, carbon monoxide is tasteless, odorless, and colorless. The symptoms mimic the flu and make the person drowsy. The result is that **only detection can protect people** from the danger. As deadly as fire is, it also presents flames and smoke to alert residents to flee. CO presents no such warning. The typical response to CO symptoms is to want to go to sleep or, if sleeping, never to wake up. This is why detection in the home is so important.
- While fossil fuel burning appliances cause the majority of CO incidents, they are not the only causes. There is justification for requiring alarms in all homes, not just those with gas or oil appliances. Mecklenburg County, North Carolina, has taken this approach. Here are some reasons why:
 - Automobiles accidentally left running in attached garages have claimed numerous lives. One of the most recent incidents of this killed a couple in Onawa, Iowa, in just the last month.
 - Another major cause of CO deaths is gas generators used during power outages. In just the first few days after Hurricane Katrina, the CPSC had counted at least five deaths in Louisiana and Florida, caused by gas generators.

The Residential Fire Safety Institute is a non-profit corporation dedicated to the reduction of the loss of life and property to residential fires. While carbon monoxide deaths and illnesses are not typically considered fire deaths in the traditional sense, these tragedies are equally devastating and just as preventable.

Thank you for your consideration. If the RFSI can be of any assistance as you contemplate this matter, please feel free to contact me directly.

Sincerely,



Roy L. Marshall

Director, Residential Fire Safety Institute

The RFSI is a public interest group dedicated to reducing residential fire deaths and injuries through the advocacy of fire sprinklers, smoke alarms, carbon monoxide detectors and fire-safe behavior.