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Arlington, VA 22209

703.841.3200

January 13, 2026

To:

**Mo Madani**

Technical Director

Building Codes and Standards Office

Dear Mr. Madani,

NEMA would like to request Modification E12048-R1, as approved by the Commission, be reconsidered by the Electrical TAC to either reaffirm their recommendation to approve E12048 as submitted or to reverse that recommendation by accepting E12048-R1.

This modification to NFPA 70, section 210.8(F) within section E3408.1 of the Florida Building Code, Residential reduces the minimum life safety requirement of the national consensus standard [553.73(9)(a)(5)] and creates a conflict with the Florida Fire Prevention Code [553.73(1)(d)].

The sunset date for the listed HVAC exception was established to give both HVAC and GFCI manufacturers the time needed to update applicable product safety standards to ensure compatibility between both technologies. The deadline for product compatibility will have long been passed by at the time the 9<sup>th</sup> edition FBC goes into effect. In fact, many GFCI circuit breakers are available on the market today that are fully compatible with all listed HVAC equipment. One example are SPGFCIs marked “HF” or “HF+” that do not trip when the frequency weighted differential current is less than the specified value for a Class C, Class D, or Class E SPGFCI.

NEMA greatly appreciates your consideration of this public comment request on Modification E12048.

Sincerely,

*Bryan Holland, MCP, CSP.*

Bryan Holland

Managing Director

National Electrical Manufacturers Association (NEMA)