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  **Jr Ellis, Raymond C** 

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U. S. Fire Administration (Group) 

Addressed To

Records Management

Classification*

FEMA 

Subject

NFPA decision to no longer report hotel/motel fire
experience in residential occupancies.  

Keyword



Summary



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January 8, 2009

Office of Management,
Records Management Division,
Federal Emergency Management Agency
500 C Street SW, Mail Drop Room 301
Washington, D. C.

Re: OMB Number 1660-0068
Form Numbers FEMA Form 516-1

To whom it may concern:

I am quite concerned that action would be considered that endangers the lives of Federal employees on travel assignment. I have been with the lodging industry for 54 years and was on staff of the American Hotel & Motel Association, predecessor to the American Hotel & Lodging Association, from 1977 through June, 1994

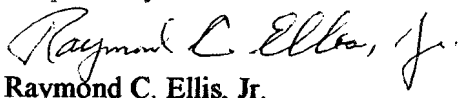
As staff director of operations, loss prevention management, and insurance, I was directly involved in the major retrofit programs that permitted the lodging industry to achieve a level of protection through smoke detection and sprinkler suppression systems that resulted in an NFPA decision to no longer report hotel/motel fire experience in the annual residential occupancies fire data. The statistical instrument used in those calculations would result in erroneous data for the lodging industry due to the sharp reduction in fire and fire fatality experience.

Since the Hotel/Motel Fire Safety Act of 1990 did not mandate all lodging establishments comply, (it applied to only those properties dedicated to serving the government employee on travel assignment), it was critical a list be established and maintained that would provide information for the Federal business traveler to only stay in listed properties with protection as required under the Act.

Due to the potential for litigation, if Meeting Planners International or the corporate travel office of a business organization, or other travel agencies registered their clients in a non-complying hotel, in the event of a fire emergency, their position would be indefensible.

The paltry sums that might be saved in reduction of paperwork as compared with the potential for lives lost because of assignment to a non-complying property is short-sighted, and callous indifference to the lives of many members of the traveling public and of government agencies. I recommend withdrawal of this proposed paperwork reduction in favor of the lives of the traveler.

Respectfully submitted


Raymond C. Ellis, Jr.