This is a formal request for an interpretation of the provisions found in the 2007 California Fire Code, Chapter 10, sections 1028.6.

1. **Are metal “roll-down” type security shutters placed over required emergency escape openings subject to this code section?**

   Yes. If the product complies with “Releasing Systems for Security in Dwellings” (CCR, Title 24, Part 12 California Reference Standards Code, Standard 12-3)

2. **Are electrically operated roll-down security shutters required to have a manual over-ride on the interior of each room?**

   Yes. If the product complies with “Releasing Systems for Security in Dwellings” (CCR, Title 24, Part 12 California Reference Standards Code, Standard 12-3)

3. **Does a permanently attached, manual “hand-crank” over-ride device meet the “…without the use of a key, tool or force greater than that which is required for normal operation of the escape and rescue opening” requirement of this code section?**

   Yes. If the product complies with “Releasing Systems for Security in Dwellings” (CCR, Title 24, Part 12 California Reference Standards Code, Standard 12-3)
4. If the normal operation of electrically operated roll-down shutters is conducted using a battery operated remote control device, would such a device be considered a “key” or “tool”?

A remote controlled device would not be an approved emergency release mechanism as required by the standard.