

## ATTACHMENT A - Response to NYC Interpretation

### **How the concerns in the NYC interpretation have been addressed by Bocci and other Relevant Information.**

The response to the 2019 interpretation read as follows:

*This product is not acceptable to be installed in NYC for the following concerns;*

- 1. Where MC cable is used, the equipment ground conductor shall be bonded to the box see 250.118(10) and 250.148(B), such termination is not visible to inspection.*
- 2. Where AC cable is used, the anti-short is not visible to inspection, 320.40.*
- 3. Where two receptacles are installed or splices are made for other receptacle downstream, the wiring splices will not be accessible, 317.72(D).*
- 4. Grounding provision is not accessible, 314.40(D)*

**Bocci Response to NYC Interpretation.** As noted in the installation instructions, Attachment B, only non-metallic wiring methods and non-metallic device boxes are permitted (addressing concerns in 1, 2 and 4 above). In addition, no splicing is permitted in the device box. In response to concern 3, each receptacle is directly fed from an accessible junction box. The connection at the receptacle is fully accessible with the device removed because the connection employs clamping-type connectors. As required by the TIA (Attachment C) and in the Bocci installation instructions, no other splices are permitted in the device box.

**Additional Relevant Information.** The 22 system was CSA Listed in 2009 and subsequently UL Listed in 2015 providing coverage in both countries. This item has been selling in the US and Canada for 13 years with over 75,000 units sold *without a single safety incident*. Bocci has received no safety complaints, no complaints of malfunctioning, no complaints about lack of access to the wiring, no lawsuits, and no insurance claims whatsoever concerning the listed 22 System.

The 22 System was developed because there was a strong aesthetic demand for it. Before the 22 System, architects and trades went to great lengths to hide and obscure receptacles and other wall accessories for certain custom applications. These efforts and solutions were often site-invented and inevitably "homemade" with no testing or engineering. It is likely that removing the 22 System from the market would risk pushing the industry back to a black-market approach that would endanger life and property.