



MASSACHUSETTS ASSOCIATION of REALTORS®

**STATEMENT OF THE MASSACHUSETTS ASSOCIATION OF REALTORS®  
REGARDING 527 CMR 1.00: 13.7 - 13.10  
BOARD OF FIRE PREVENTION REGULATIONS  
AUGUST 4, 2016**

On behalf of its more than 22,000 Realtor®-members who work daily with buyers, sellers, and homeowners, the Massachusetts Association of Realtors® (“MAR”) offers the following comments to the proposed amendments to 527 CMR 1.00: 13.7-13.10. These sections of the regulation are of particular interest to Realtors® and their clients as it directly relates to the requirements upon sale and transfer of homes.

We commend the Board of Fire Prevention Regulations for its work on this issue and its commitment to producing guidance documents for cities and towns to follow during smoke alarm inspections at the sale and transfer of a home. We respectfully recommend, however, that Note 2 on Table 13.7A contain the language from 527 CMR 1.00: 1.,1 which clarifies the requirements for inspection at sale or transfer so that the intent of the regulation is implemented statewide. This would ensure that the new regulations make it clear that homeowners are only required to replace existing battery powered smoke alarms in pre-1975 buildings when the existing smoke alarm expires or is no longer operable. This would provide clarity to the Commonwealth’s 351 cities and towns that properly functioning alarms that have not yet expired are sufficient to pass an inspection at sale or transfer.

Realtors® acknowledge the many advantages of the new technology that exists in modern smoke alarms and recognize the opportunity to better help protect citizens of the Commonwealth by requiring the ten-year non-replaceable battery smoke alarms in pre-1975 homes. With any new requirement, however, it is important that the public be given the opportunity to adapt to those changes. Therefore, MAR recommends that an implementation period of three to six months be adopted to allow for an education and outreach campaign. MAR would welcome the opportunity to work with the Department in educating Realtor®-members and their buyers and sellers during this time or at any other time.

Thank you for your time and attention to this important matter. Please do not hesitate to contact Justin Davidson, Legislative & Regulatory Counsel, Massachusetts Association of Realtors® at 781-839-5520 or [JDavidson@marealtor.com](mailto:JDavidson@marealtor.com).