

From: [Jessica Donovan](#)
To: ["electricians.board@state.ma.us"](mailto:electricians.board@state.ma.us)
Subject: Electrical Board Agenda - October 2017
Date: Tuesday, September 26, 2017 11:16:00 AM
Importance: High

Good Morning, Electrical Board –

On behalf of the MSCA, I would like to formally request, Clarification on the below questions from the Electrical Board.

1. If replacing an existing hardwired power limited thermostat, with cabling already in place and installed by others, is an A or B license needed to simply replace the existing thermostat with a replacement thermostat which is z-wave wireless enabled, which can be connected wirelessly to an alarm system? Or, can a C,D license holder perform this work of swapping the thermostats?
2. If replacing an existing wireless thermostat with a z-wave enabled thermostat (I've not seen a product yet which can do this, but I'm sure it is only a matter of time), with no wiring involved whatsoever, can we assume there is no license required, with no A,B,C, or D needed?
3. For new HVAC installations, are HVAC contractors required to have A,B,C,D license holders install the power limited cabling in the case of hardwired power limited thermostats?

Would it be possible to have these items placed on the October 2017 Meeting agenda for discussion?

I look forward to hearing from you.

Thank You!

Jessica Donovan

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December 1, 2017

Board of State Examiners of Electricians
1000 Washington Street, Suite 710
Boston MA 02118-6100

Re: Request for Clarification: Systems Contractors & Technicians are Licensed to Install a Thermostat

Dear Board of Examiners of Electricians,

We respectfully request that the Electrical Board issue a written clarification indicating that C and D license holders, Systems Contractors and Systems Technicians, are allowed to install thermostats and program these new devices, protocols, and communications platforms which are an integral part of systems work.

Also, we ask that MSCA be notified and involved beforehand with any related subcommittee discussion or legal review on the question of thermostat installation, before any action is taken. As you know, our members routinely install thermostats and are, in fact, properly trained, equipped and licensed for that work. A few citations to consider:

- A thermostat, when connected to an alarm system, becomes part of, "a system requiring no overcurrent protection due to design and construction" which is the MGL 141: Section 1. Definition for, "Inherently power limited system."
- According to MGL 141, a "Security system", is an inherently power limited system of wires, conduits, apparatus, devices, fixtures, or other appliances installed and interconnected electrically or electronically to permit access control, proprietary signaling, surveillance and the detection of burglary, intrusion, holdup, or other conditions requiring response or the transmission of signals or audible alarms. A thermostat is part of an, "other appliance" and will, "transmit signals."
- When a thermostat is attached to the security system it also becomes, "systems work" by definition. MGL 141 defines "System", as a fire warning, security or other inherently power limited system, wire, conduit or device which conducts or consumes electricity and is electrically or electronically activated.
- As further clarification, it should be emphasized that once a device becomes part of the "Security system" or "system", then installers are required to have an "S license" and "Certificates of Clearance" under MGL 147 to do the work, hence precluding a number of A &

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B licensed electricians who do not have those appropriate licenses, as the device will need to be programmed in to the “security system” panel or “system”.

Furthermore, Systems Contractors and Systems Technicians install Fire warning systems which control higher voltage devices including shutting down HVAC, releasing 120 volt fire door release magnets, and triggering elevator recall.

The technology for thermostats has advanced sufficiently to make the process of installing a replacement thermostat simple enough for the “Do-It-Yourself or DIY” market, with easy color-coded instructions for connecting the existing control wires, and simple enrollment of the device into a home alarm system via wireless protocols such as Z-Wave or WiFi.

Today, any homeowner can walk into Home Depot, Lowes, or go online and purchase a NEST or programmable thermostat and connect it themselves without needing a license. It is also worth noting is that the “home energy audit” subcontract companies operating under the power utility companies to do home energy efficiency improvements install thermostats. In addition, many data networking, audio/visual, home automation, and telecommunications contractors install these devices frequently without permits or licenses for their “systems”. HVAC companies often install the thermostats and wire themselves while conducting their trade. Are they licensed to do so?

We seek to avoid any published decisions or opinions by the Electrical Board which could be construed to mean that the only people who cannot install a thermostat are the most logically licensed specialists in the trade, the “Systems Technicians”!

As always, MSCA stands ready to work collaboratively with the Electrical Board.

Thank you,

Wells A. Sampson
MSCA President
Legislative Committee

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