PUBLIC COMMENT REPORT

PUBLIC COMMENTS RECEIVED ON

FIRST PUBLIC REVIEW DRAFT

DECEMBER 23, 2013

ICC/ANSI A117.1 STANDARD

DEVELOPMENT - 2014 EDITION

The comments contained in this report will be
Considered by the A117.1 Committee.
January 21 – 24, 2014.
U.S. Access Board Conference Room
Washington, DC.

ICC A117.1 Standard – Accessible and Usable Buildings and Facilities

Public Comment Report – Comments received on First Public Review Draft

December 23, 2013

The First Public Review Draft of the 2014 edition of the ICC A117.1 Standard was issued on October 25, 2013. Public comments were accepted through December 9, 2013.

This report contains the public comments received, and the changes on which the comments were made. Proposed changes for which no public comment was received are not included in this report.

The First Public Review Draft contains changes to the 2009 edition which have been approved by the A117.1 Standard Committee. Only the actual changes to the standard were shown.

For further information please see the following documents:

1. First Public Review Draft
2. First Public Review Draft Background Report.
3. First Public Review Draft – Supplement.

For these items, please go to: **www.iccsafe.org/A117**

If you have questions, please direct them to Kermit Robinson, krobinson@iccsafe.org

Chapter 1

1-1 – 12

Add new text as follows:

101 Title

These technical criteria shall be known as Accessible and Usable Buildings and Facilities, hereinafter referred to as 'this standard'.

1-1-12 PC1

Harold Kiewel, representing self

Revise as follows:

101 Title

These technical criteria shall be known as Accessible and Usable Buildings and Facilities, hereinafter referred to as 'this ~~standard~~ Standard'.

General comments of Mr. Kiewel: The following comments regarding the proposed 2014 revisions to the A117.1 are presented in the same order and under the same change-item-code as in the proposal. Where an item in the proposal is not addressed in this doucment. I have nothing to add to the conversation regarding the item.

General Notes.

I am opposed to changing dimensions to non-modular (odd) numbers. I believe that dimensional requirements for the standard should, to the maximum extent practicable, be modular in both Imperial and metric (SI(systems. Imperial dimensions should be in multiple of 4-inches, and conversion to metric measure should use 4 inches = 100 mm.

As a professional technical writer, I take exception to the modern practice of wasting the first Article of every major sub-part with the phrase "[this work] shall comply with this Standard." If the Standard has a purpose, and the Article has title, the phrase is superfluous. You could save a couple of pages by deleting these lines.

I have not pointed out spelling, tense, or minor grammatical errors. There are some, but I presume the committee has access to editors who will, in due course, correct those items.

Reason specific to 1-1-12: In keeping with proper writing technique, the word 'standards' at the end of the sentence should be capitalized; "*hereinafter as this Standard*." The rule states that, when you use a common noun to replace a proper noun, that noun should be capitalized.

1-4 – 12

Revise as follows:

102 Human Factor ~~Anthropometric~~ Provisions. The technical criteria in this standard are based on body sizes and functional abilities of adults and, in some sections, children. They provide minimum conditions of accessibility. ~~adult dimensions and anthropometrics. This standard also contains technical criteria based on children's dimensions and anthropometrics for drinking fountains, water closets, toilet compartments, lavatories and sinks, dining surfaces, work surfaces and benches.~~

1-4-12 PC1

Larry Perry, representing self

Revise as follows:

102 Human Factor Provisions. The technical criteria in this standard are based on body sizes and functional abilities of adults and, in ~~some~~ those sections where specifically noted, children. ~~They provide minimum conditions of accessibility.~~

Reason: Proposed revision to the first sentence is for clarity. The standard already specifically notes where it includes technical criteria for children, so this section should indicate that; the current vague text leaves it unclear if other criteria in the standard are also based on body sizes and abilities of children.
The second sentence is not appropriate in this section. The previous section (102 Purpose) already clearly states the broad range of abilities intended to be accommodated by the standard, and the intent to allow independent access to and use of buildings, facilities, and elements.

1-5 – 12

Revise as follows:

~~104.2 Dimensions.~~ ~~Dimensions that are not stated as "maximum" or "minimum" are absolute. All dimensions are subject to conventional industry tolerances.~~

104.2 Dimension tolerances. All dimensions are subject to conventional industry tolerances except where the requirement is as a range with stated minimum and maximum end points.

1-5-12 PC1

Harold Kiewel, representing self

Comment: "*conventional industry tolerances*" is an un-enforceable expression unless there is a reference manual or standard of construction tolerances; in which case the reference should be cited here. See Mr. Kiewel's general comments at 1-1-12.

1-5-12 PC2

Tim Larson, representing self; Fritz Rasmussen, representing Kwik Trip, Inc.

Comment: -Good- *This eliminates all absolute dimensions. This takes into consideration true field tolerances.*

1-5-12 PC3

Larry Perry, representing self

Further revise as follows:

104.2 Dimension tolerances. All dimensions are subject to conventional industry tolerances ~~except where the requirement is as a range with stated minimum and maximum end points~~.

Reason: Besides editorial tweaking, the only rationale for the added prohibition from applying tolerance where the standard states a 'range' of dimensions is because the language 'is very similar to ADA'. The committee has considered, and rejected, similar language numerous times in both the 2003 and 2009 edition revision cycles. Establishing different rules for tolerances based on the editorial format remains fundamentally flawed, and should not be done. The following excerpt shows how the new language would establish arbitrary rules:

> **307.2 Protrusion Limits.** Objects with leading edges **more than 27 inches (685 mm) and not more than 80 inches (2030 mm)** ***(no tolerance allowed)*** above the floor shall protrude **4 inches (100 mm) maximum** ***(tolerance OK)*** horizontally into the circulation path.
>
> **EXCEPTION:** Handrails shall be permitted to protrude **4 $^{1}/_{2}$ inches (115 mm) maximum** ***(tolerance OK)***.
>
> **307.3 Post-Mounted Objects.** Objects on posts or pylons shall be permitted to overhang **4 inches (100 mm) maximum** ***(tolerance OK)*** where **more than 27 inches (685 mm) and not more than 80 inches (2030 mm)** ***(no tolerance allowed)*** above the floor. Objects on multiple posts or pylons where the clear distance between the posts or pylons is **greater than 12 inches (305 mm)** ***(tolerance OK)*** shall have the lowest edge of such object ***either 27 inches (685 mm) maximum or 80 inches (2030 mm) minimum above the floor. (tolerance OK below 27" or above 80" – not stated as 'end points')***

307.4 Vertical Clearance. Vertical clearance shall be **80 inches (2030 mm) minimum *(tolerance OK)*** in height. Rails or other barriers shall be provided where the vertical clearance **is less than 80 inches (2030 mm) *(tolerance OK)*** in height. The leading edge of such rails or barrier shall be located **27 inches (685 mm) maximum *(tolerance OK)*** above the floor.

A rail or barrier added in accordance with 307.4 (which allows tolerance above 27") would violate 307.2, since that section would not allow tolerance above 27".

1-7– 12

Add new text as follows:

104.2 Calculation of Percentages. Where the determination of the required size or dimension of an *element* or *facility* involves ratios or percentages, rounding down for values less than one half shall be permitted.

1-7-12 PC1

Tim Larson, representing self

Comment: -Good- *This allows reasonable rules for rounding decimals.*

1-10 – 12

Revise or add the following definitions:

106.5 Defined terms

assembly area. A *building* or *facility*, or portion thereof, used for the purpose of entertainment, worship, educational or civic gatherings, or similar purposes. For the purposes of these requirements, *assembly areas* include, but are not limited to, classrooms, lecture halls, courtrooms, public meeting rooms, public hearing rooms, legislative chambers, spaces utilized for viewing motion picture projections, auditoria, theaters, playhouses, dinner theaters, concert halls, centers for the performing arts, amphitheaters, arenas, stadiums, grandstands, places of religious worship or convention centers.

assistive listening system (ALS). An amplification system utilizing transmitters, receivers, and coupling devices to bypass the acoustical *space* between a sound source and a listener by means of induction loop, radio frequency, infrared, or direct-wired equipment.

place of religious worship. A building or a portion thereof intended for the performance of religious services.

space. A definable area, such as a room, toilet room, hall, *assembly area*, *entrance*, storage room, alcove, courtyard, or lobby.

transition plate. A sloping pedestrian walking surface located at the ends of a *gangway*.

vehicular way. A route provided for vehicular traffic, such as in a street, driveway, or parking *facility*.

1-10-12 PC1

Larry Perry, representing self

Delete without substitution:

106.5 Defined terms

~~**space.** A definable area, such as a room, toilet room, hall, *assembly area*, *entrance*, storage room, alcove, courtyard, or lobby.~~

Reason: This definition was deleted from the standard during the 1992 edition revision cycle. It adds no clarity to the standard; the standard definition is adequate.

1-10-12 PC2

Curt Wiehle, Minnesota Construction Codes and Licensing, representing self

Delete without substitution:

~~**place of religious worship.** A building or a portion thereof intended for the performance of religious services.~~

Reason: The term place of religious worship only appears in the definition of assembly area in this same section. There is a list of areas that are included in the definition of assembly area, none are of which are further defined in Section 107.5. It is inconsistent to define one term at the exclusion of the others.