

Chapter 10

10-1 – 12

Chapter 10, Chapter 11 - Revise as follows:

Chapters 10 and 11: Renumber all sections the standard to exchange the order of these 2 chapters.

10-1-12 PC1

Larry Eberly, representing Pennsylvania Builders Association

Disapprove the change. Return the text to that found in existing standard.

Reason: ANSI A117.1 Chapters and numbering have been in place for decades and will confuse future use for those acquainted with the standards and coordination with prior versions of the Standard. In addition, this requirement may conflict with any specific jurisdictional reference standards which may exist elsewhere specific to either chapter. The reason for this proposed change contained in the First Public Review Draft – Background Report is to coordinate the numbering of ANSI A117.1 Chapter 11: Recreational Facilities to be consistent with a chapter name change in 2010 ADA (Chapter 10: Recreation Facilities previously Transportation Facilities.) The reference to ANSI A117.1 Chapter 10 as Dwelling Units and Sleeping Units has been in place for much longer than this 2010 ADA chapter change and much longer than ANSI's addition of Chapter 11 for Recreational Facilities.

10-2– 12

Add new text as follows:

1001.2 Mail Receptacles. Where provided, mail receptacles shall be accessible in accordance with Section 1001.2.1 or 1001.2.2.

1001.2.1 Dwelling Units and Sleeping Units. Where mail receptacles are provided for Accessible, Type A or Type B dwelling and sleeping units, accessible mail receptacles shall be provided in accordance with Section 1001.2.1.1 or 1001.2.1.2.

1001.2.1.1 Centralized Mail Receptacles. Where each individual mail compartment of a centralized mail receptacle is assigned to a specific dwelling unit or sleeping unit, the individual mail compartments shall comply with Section 1001.2.1.1.1 or 1001.2.1.1.2.

1001.2.1.1.1 Buildings Without an Elevator. In a structure without an elevator, all individual mail compartments assigned to Accessible units, Type A units and Type B units in each location shall be accessible.

1001.2.1.1.2 Buildings with an Elevator. In a structure with an elevator, fifty percent of all individual mail compartments in each location shall be accessible. Individual mail compartments assigned to Accessible and Type A units shall be included in the accessible mailboxes. In addition to the individual mail compartments assigned to dwelling or sleeping units, an additional number of individual mail compartments that is equal to ten percent of the total number of dwelling units and sleeping units, but not less than one, at each location shall be accessible.

1001.2.1.1.3 Parcel Lockers. All parcel lockers of centralized mail receptacles shall be accessible.

1001.2.1.2 Individual House-mounted and Curbside Mail Receptacles. Where an individual house-mounted or curbside mail receptacle serves a dwelling unit or sleeping unit that is required to be an Accessible unit, Type A unit or Type B unit, the mail receptacle shall be accessible.

10-2-12 PC1

Kimberly Paarlberg, representing ICC

Delete and substitute as follows:

~~1001.2 Mail Receptacles.~~ Where provided, mail receptacles shall be accessible in accordance with Section 1001.2.1 or 1001.2.2.

~~1001.2.1 Dwelling Units and Sleeping Units.~~ Where mail receptacles are provided for Accessible, Type A or Type B dwelling and sleeping units, accessible mail receptacles shall be provided in accordance with Section 1001.2.1.1 or 1001.2.1.2.

~~1001.2.1.1 Centralized Mail Receptacles.~~ Where each individual mail compartment of a centralized mail receptacle is assigned to a specific dwelling unit or sleeping unit, the individual mail compartments shall comply with Section 1001.2.1.1.1 or 1001.2.1.1.2.

~~1001.2.1.1.1 Buildings Without an Elevator.~~ In a structure without an elevator, all individual mail compartments assigned to Accessible units, Type A units and Type B units in each location shall be accessible.

~~1001.2.1.1.2 Buildings with an Elevator.~~ In a structure with an elevator, fifty percent of all individual mail compartments in each location shall be accessible. Individual mail compartments assigned to Accessible and Type A units shall be included in the accessible mailboxes. In addition to the individual mail compartments assigned to dwelling or sleeping units, an additional number of individual mail compartments that is equal to ten percent of the total number of dwelling units and sleeping units, but not less than one, at each location shall be accessible.

~~1001.2.1.1.3 Parcel Lockers.~~ All parcel lockers of centralized mail receptacles shall be accessible.

~~1001.2.1.2 Individual House-mounted and Curbside Mail Receptacles.~~ Where an individual house-mounted or curbside mail receptacle serves a dwelling unit or sleeping unit that is required to be an Accessible unit, Type A unit or Type B unit, the mail receptacle shall be accessible.

1102.13 Mail compartments. Mail compartment serving Accessible units shall comply with Section 906.

1103.13 Mail compartments. Mail compartment serving Type A units shall comply with Section 906.

1104.13 Mail compartments. Where mail compartments are serving Type B units, accessible mail compartments shall be provided in accordance with Section 1104.13.1 or 1104.13.2. All accessible mail compartments shall comply with Section 906.

1104.13.1 Centralized Mail Receptacles. Where each individual mail compartment of a centralized mail receptacle is assigned to a dwelling unit or sleeping unit, accessible individual mail compartments shall be provided in accordance with Section 1104.13.1.1 or 1104.13.1.2.

1104.13.1.1 Buildings Without Elevator Service. In a structure without elevator service, individual mail compartments assigned to Type B units shall be accessible.

1104.13.1.2 Buildings With Elevator Service. In a structure with elevator service, fifty percent of individual mail compartments shall be accessible. Individual mail compartments assigned to Accessible and Type A units and complying with Section 1102.13 or 1103.13 shall be permitted to be included in the number of required accessible mail compartments. In addition to the individual mail compartments assigned to dwelling or sleeping units, an additional number of individual mail compartments that is equal to ten percent of the total number of dwelling units and sleeping units, but not less than one, shall be accessible mail receptacles.

1104.13.2 Individual house-mounted and curbside mail compartments. Where an individual house-mounted or curbside mail compartments serves a Type B dwelling unit or sleeping unit the mail compartments with Section 906.

906 Mail Compartments

906.1 General. Accessible mail compartment shall comply with Section 906.

906.2 Clear floor space. A clear floor space complying with Section 305, positioned for either a forward or parallel approach, shall be provided adjacent to each accessible mail compartment.

906.3 Height. Operable parts on accessible mail compartment shall be located within at least one of the reach ranges specified in Section 308.

Exception: Operable parts on accessible mail compartments in centralized mail receptacles and serving Type B units shall be permitted an unobstructed high side reach range at 54 inches (1370 mm) maximum above the floor.

906.4 Operable parts. Operable parts of accessible mail compartments shall comply with Section 309.

Reason: The purpose of this proposal is a clarification of what is required for accessible mailboxes. Please keep in mind that mailbox locations are also regulated by the U.S. Post Office.

Mailboxes are only addressed for dwelling and sleeping units. This is a new Section 1101.2. The current requirements do not clarify what makes a mailbox accessible. Therefore, technical requirements similar to storage facilities are provided in a new Section 906.3. The exception (already approved by the committee as an exception to Section 308.3.1 for unobstructed high side reach) was relocated to these provisions so that the requirements/allowances can be together. The exception is still needed for facilities such as high rise apartment buildings and dorm facilities. The exception is also clarified/limited to only apply to accessible mail receptacles assigned to Type B units in centralized facilities. Mail receptacles for Type B units in centralized facilities that are not accessible mail receptacles can be at any height approved by the U.S. Post Office. Accessible mail receptacles for Accessible and Type A units cannot use this exception.

There is also an attempt to editorially clean up the language for accessible mail compartments. Mail receptacles are either centralized or individual, so an additional charging paragraph (1101.2.1) is not needed. If mail receptacles are centralized in groups throughout a facility, than 'at each location' is not needed – the language will apply to all centralized facilities. The text and title is revised to 'elevator service' for consistency with the language in the exceptions for Type B units in IBC Section 1107.7. The terms 'mail receptacles', 'mail compartments' and 'mailboxes' appear to be used interchangeably. We need to be consistent. The proposal is written with mail receptacles as room the boxes are located in and mail compartments as the individual boxes.

Below is what I had revised looking at just the original text – this is for committee information only so it is clear what I was looking at. Once I had it cleaned up, it became clear that it would work better within the individual unit requirements, the same way we address other facilities that serve Accessible, Type A or Type B units.

1101 General

1101.1 Scoping. Dwelling units and sleeping units required to be Accessible units, Type A units, Type B units, Type C (Visitable) units or units with accessible communication features by the scoping provisions adopted by the administrative authority shall comply with the applicable provisions of Chapter 11.

1101.2 Mail Receptacles Compartments. Where mail compartments are provided for Accessible, Type A or Type B dwelling and sleeping units, accessible mail receptacles compartments shall be accessible provided in accordance with Sections 1101.2.1 or 1101.2.2. All accessible mail compartments shall comply with Section 1101.2.3

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~~1101.2.1 Dwelling Units and Sleeping units.~~ Where mail receptacles are provided for Accessible, Type A or Type B dwelling and sleeping units, accessible mail receptacles shall be provided in accordance with Section 1101.2.1.1 or 1101.2.1.2.

1101.2.1.4 Centralized Mail Receptacles. Where each individual mail compartment of a centralized mail receptacle is assigned to a specific dwelling unit or sleeping unit, the accessible individual mail compartments shall comply be provided in accordance with Section 1101.2.1.1.4 or 1101.2.1.4.2.

1101.2.1.4.1 Buildings Without an Elevator Service. In a structure without an elevator service, all individual mail compartments assigned to Accessible units, Type A units and Type B units in each location shall be accessible.

1101.2.1.4.2 Buildings With an Elevator Service. In a structure with an elevator service, fifty percent of all individual mail compartments in each shall be accessible. Individual mail compartments assigned to Accessible and Type A units shall be included in the accessible mail compartments mailboxes. In addition to the individual mail compartments

assigned to dwelling or sleeping units, an additional number of individual mail compartments that is equal to ten percent of the total number of dwelling units and sleeping units, but not less than one, ~~at each location~~ shall be accessible.

1101.2.1.2 Individual house-mounted and curbside mail receptacle compartment. Where an individual house-mounted or curbside mail receptacle compartment serves a dwelling unit or sleeping unit that is required to be an Accessible unit, Type A unit or Type B unit, the mail receptacle compartment shall be accessible.

10-2-12 PC2

Kimberly Paarlberg, representing ICC

Further revise as follows:

1001.2 Mail Receptacles. Where provided, mail receptacles shall be accessible in accordance with Section 1001.2.1 or 1001.2.2.

1001.2.1 Dwelling Units and Sleeping Units. Where mail receptacles are provided for Accessible, Type A or Type B dwelling and sleeping units, accessible mail receptacles shall be provided in accordance with Section 1001.2.1.1 or 1001.2.1.2.

1001.2.1.1 Centralized Mail Receptacles. Where each individual mail compartment of a centralized mail receptacle is assigned to a specific dwelling unit or sleeping unit, the individual mail compartments shall comply with Section 1001.2.1.1.1 or 1001.2.1.1.2.

1001.2.1.1.1 Buildings Without an Elevator. In a structure without an elevator, all individual mail compartments assigned to Accessible units, Type A units and Type B units in each location shall be accessible.

1001.2.1.1.2 Buildings with an Elevator. In a structure with an elevator, fifty percent of all individual mail compartments in each location shall be accessible. Individual mail compartments assigned to Accessible and Type A units shall be included in the accessible mailboxes. ~~In addition to the individual mail compartments assigned to dwelling or sleeping units, an additional number of individual mail compartments that is equal to ten percent of the total number of dwelling units and sleeping units, but not less than one, at each location shall be accessible.~~

1001.2.1.1.3 Parcel Lockers. All parcel lockers of centralized mail receptacles shall be accessible.

1001.2.1.2 Individual House-mounted and Curbside Mail Receptacles. Where an individual house-mounted or curbside mail receptacle serves a dwelling unit or sleeping unit that is required to be an Accessible unit, Type A unit or Type B unit, the mail receptacle shall be accessible.

Reason: According to comments in the past from the U.S. Post Office, the requirements would require an excessive number of unneeded or unused mailboxes. The basic requirements already accounts for and requires accessible mailboxes that can be assigned to individual units as needed.

10-2-12 PC3

Larry Perry, representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: Mail receptacles, Mailboxes and Mail Facilities should be mandated by USPS standards subject by law under the Architectural Barriers Act (ABA) and should not be complicated by standards which only target residential uses within ANSI A117.1. In addition, Type B dwelling units should not have the same requirements as Type A and Accessible Units. Type B dwelling Units are more prevalent, have less accessibility and rely on adaptability for persons with disabilities; they typically will not be adapted even in the instance of someone with a handicap or mobility device attributable to the individual's preferences, their mobility device's design and their individual abilities. For the vast majority of people living in Type B dwelling units without a mobility device especially taller people, lower postal boxes may create a strain. Most homes in a multifamily community are required to be Type B with minimal users requiring lower; All units in an elevator serviced building (other than those to required to be Type A or accessible units) and all ground floor units in a building without elevator service. The term "accessible mail receptacle" is also not clearly defined nor referenced.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 accessibility requirements which affect residential communities and dwelling units. Requirements for Mailboxes, Mail Facilities and mail receptacles for residential uses are regulated by USPS standards and should not be mandated in the ANSI A117.1 standard. Any change or new requirement will conflict with USPS standards, USPS manufactured approved mailbox design and installation and creates excessive space for mailboxes in residential communities. The STANDARD-4C (or STD-4C) is the current USPS regulation for any centralized, wall-mounted mailboxes, whether located inside an office high-rise or within a new single-family subdivision as an outdoor centralized mailbox kiosk.

The USPS Accessibility Guidelines published by the United States Access Board include scoping chapters related to enforcement of the ADA for accessibility requirements although as a matter of law, the Postal Service is subject to the Architectural Barriers Act (ABA), rather than the ADA. Accessibility requirements targeting only mail facilities for dwelling units in the ANSI Standard further complicates coordination of all the requirements and create further conflicts and unforeseen consequences.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC., without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

Reason: This proposal is almost entirely scoping and is inappropriate for inclusion in the standard. This language should be submitted to building codes for adoption with the other scoping provisions for A117.1.

The proposed text for centralized mail receptacles applies only where mailboxes are assigned to specific units; USPS recommends that mailboxes be numbered sequentially, and not be tied to specific unit numbers; this is for security purposes. As written, there would be no requirements for these configurations.

The proposed 50% accessible, plus 10% 'spare' accessible mailboxes, is not warranted. Adding a technical exception that would allow mailboxes at up to 54" high with an unobstructed side reach would allow a higher percentage of mailboxes to be deemed 'accessible' without impacting space requirements severely.

Outgoing mail slots are not addressed by the proposed text.

Centralized mailbox installations are subject to USPS 4C standard if they are to be used by USPS for mail delivery. Proposals to address these installations, already subject to the USPS standard, should be developed in concert with the USPS. The standard establishes minimum heights above the minimums allowed by A117.1, thereby reducing the space available for accessible boxes. Standard configurations without parcel lockers (which can be eliminated where there is another approved means for USPS to deliver packages, such as a concierge) typically provide more than 50% of mailboxes at 54" or less.

10-2-12 PC4

Larry Eberly, representing Pennsylvania Builders Association

Disapprove the change. Return the text to that found in existing standard.

Reason: Mail receptacles, Mailboxes and Mail Facilities should be mandated by USPS standards subject by law under the Architectural Barriers Act (ABA) and should not be complicated by standards which only target residential uses within ANSI A117.1. In addition, Type B dwelling units should not have the same requirements as Type A and Accessible Units. Type B dwelling Units are more prevalent, have less accessibility and rely on adaptability for persons with disabilities; they typically will not be adapted even in the instance of someone with a handicap or mobility device attributable to the individual's preferences, their mobility device's design and their individual abilities. For the vast majority of people living in Type B dwelling units without a mobility device especially taller people, lower postal boxes may create a strain. Most homes in a multifamily community are required to be Type B with minimal users requiring lower; All units in an elevator serviced building (other than those to required to be Type A or accessible units) and all ground floor units in a building without elevator service. The term "accessible mail receptacle" is also not clearly defined nor referenced.

Pennsylvania Builders Association opposes any change to the ANSI 117.1 accessibility requirements which affect residential communities and dwelling units. Requirements for Mailboxes, Mail Facilities and mail receptacles for residential uses are regulated by USPS standards and should not be mandated in the ANSI A117.1 standard. Any change or new requirement will conflict with USPS standards, USPS manufactured approved mailbox design and installation and creates excessive space for mailboxes in residential communities. The STANDARD-4C (or STD-4C) is the current USPS regulation for any centralized, wall-mounted mailboxes, whether located inside an office high-rise or within a new single-family subdivision as an outdoor centralized mailbox kiosk.

The USPS Accessibility Guidelines published by the United States Access Board include scoping chapters related to enforcement of the ADA for accessibility requirements although as a matter of law, the Postal Service is subject to the Architectural Barriers Act (ABA), rather than the ADA. Accessibility requirements targeting only mail facilities for dwelling units in the ANSI Standard further complicates coordination of all the requirements and create further conflicts and unforeseen consequences.

Pennsylvania adopts the accessibility provisions of the newest triennial revisions to the ICC Family of Codes that have been adopted in PA, which includes the IBC, IRC, IMC, IPC and IEBC., without modification. This includes the references to ICC/ANSI A117.1. Mandatory adoption in Pennsylvania, without modification, has unforeseen consequences to the building industry, both commercial and residential communities.

10-8– 12

Revise as follows:

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided ~~in a kitchen~~ above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall ~~not~~ be required to comply with Section 309.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Section 309 provided that the counter top is 7 square feet (0.65 m²) maximum.

(Remaining exceptions are renumbered by unchanged)

1003.9 Operable Parts. Lighting controls, electrical panel boards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided ~~in a kitchen~~ above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall ~~not~~ be required to comply with Section 309.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Section 309 provided that the counter top is 7 square feet (0.65 m²) maximum.

(Remaining exceptions are renumbered by unchanged)

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Section 309.2 and 309.3.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided ~~in a kitchen~~ above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall ~~not~~ be required to comply with Sections 309.2 and 309.3.

3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Sections 309.2 and 309.3 provided that the counter top is 7 square feet (0.65 m²) maximum.

(Remaining exceptions are renumbered by unchanged)

10-8-12 PC1

Cheryl Kent, representing U.S. Department of Housing and Urban Development

Comment: As part of this comment, we are requesting that figures be added to the standard to illustrate the application of the language at Sections 1002.9, 1003.9, and 1004.9, Exception 3. HUD believes the text in Sections 1002.9, 1003.9 and 1004.9, Operable Parts, Exception 3 is unclear in terms of the language dealing with 7 square feet. We do not believe this language will be clear or understandable to most users of the standard. We do not have alternative language to offer because it is not clear whether the 7 square feet could have 12 inches out from the corner at the front of the countertop on one side, and 36 inches out from the corner at the front of the counter on the other side; or is the intent that this applies when you have 24 inches out from the corner on each side, at the front of the countertop? We believe figures are needed to illustrate how this language is to be understood.

10-8-12 PC2

Larry Eberly, representing Pennsylvania Builders Association

Further revise as follows:

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Section 309.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner ~~between appliances~~, receptacle outlets over the counter top shall not be required to comply with Section 309 provided that the counter top ~~is 7~~ area does not exceed 9 square feet (~~0.65~~ 0.81 m²) maximum.

(Remaining exceptions are renumbered by unchanged)

1003.9 Operable Parts. Lighting controls, electrical panel boards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Section 309.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner ~~between appliances~~, receptacle outlets over the counter top shall not be

required to comply with Section 309 provided that the counter top ~~is 7~~ area does not exceed 9 square feet (~~0.65~~ m^2) maximum.

(Remaining exceptions are renumbered by unchanged)

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with ~~Section 309.2~~ Sections 1004.3.3 and 309.3.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with ~~Sections 309.2~~ 1004.3.3 and 309.3.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner ~~between appliances,~~ receptacle outlets over the counter top shall not be required to comply with ~~Sections 309.2~~ 1004.3.3 and 309.3 provided that the counter top ~~is 7~~ area does not exceed 9 square feet (~~0.65~~ m^2) maximum.

(Remaining exceptions are renumbered by unchanged)

Reason: Electric outlet locations within dwelling unit kitchens with countertops typically 25" or 25 1/2" in depth particularly in corner conditions and with various appliances with different design and manufacturer's specifications definitely need to be addressed. Every kitchen is designed uniquely with different accessibility challenges. This change acknowledges and clarifies a condition which occurs frequently with no feasible solution, a corner cabinet situation which often times is a lazy susan 36" x 36". This condition also does not always occur in between two appliances. PBA would suggest the size of the corner countertop area maximum be increased to 9 s.f. accordingly to more accurately reflect countertop depth and corner cabinets' dimensions in both directions (larger than 7 s.f) This may have to be increased even more (13 sf.) if it is to occur at the centerline of the clear floor space.

10-8-12 PC3

Dominic Marinelli, representing United Spinal Association

Further revise as follows:

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Section 309.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with ~~Section 309~~ provided that the counter top is 7 square feet (~~0.65~~ m^2) maximum at least one additional receptacle complying with Section 309 is provided over another kitchen counter top.

(Remaining exceptions are renumbered by unchanged)

1003.9 Operable Parts. Lighting controls, electrical panel boards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Section 309.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with ~~Section 309~~ provided that the counter top is 7 square feet (0.65 m²) maximum at least one additional receptacle complying with Section 309 is provided over another kitchen counter top.

(Remaining exceptions are renumbered by unchanged)

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Section 309.2 and 309.3.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Sections 309.2 and 309.3.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with ~~Sections 309.2 and 309.3~~ provided that the counter top is 7 square feet (0.65 m²) maximum at least one additional receptacle complying with Section 309 is provided over another kitchen counter top.

(Remaining exceptions are renumbered by unchanged)

Reason: NONE PROVIDED

10-8-12 PC4

Kimberly Paarlberg, representing ICC

Further revise as follows:

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.

- ~~2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Section 309.~~
- ~~3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Section 309 provided that the counter top is 7 square feet (0.65 m²) maximum.~~
2. In a kitchen, provide at least two receptacle outlets over the accessible work surface. Other receptacle outlets in a kitchen and located over counter tops are not required to comply with Section 309.

(Remaining exceptions are renumbered but unchanged)

1003.9 Operable Parts. Lighting controls, electrical panel boards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
- ~~2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Section 309.~~
- ~~3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Section 309 provided that the counter top is 7 square feet (0.65 m²) maximum.~~
2. In a kitchen, provide at least two receptacle outlets over the accessible work surface. Other receptacle outlets in the kitchen and located over counter tops are not required to comply with Section 309.

(Remaining exceptions are renumbered but unchanged)

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Section 309.2 and 309.3.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Sections 309.2 and 309.3.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Sections 309.2 and 309.3 provided that the counter top is 7 square feet (0.65 m²) maximum.

(Remaining exceptions are renumbered by unchanged)

Reason: The more we work with this the more complicated it gets. Provide an accessible outlet at the accessible work surface. Other outlets will be located as required by the National Electrical Code. Many household appliances are plugged in and stay that way, so access to all outlets is not necessary, nor it is possible for locations such as corners, or 12" pieces of counter tops between a stove and a refrigerator (both of which would be required by NEC).

10-8-12 PC5

Peter A. Stratton, representing self

Revise as follows:

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Section 309.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Section 309 provided that the counter top is 7 square feet (0.65 m²) maximum.

(Remaining exceptions are renumbered by unchanged)

1003.9 Operable Parts. Lighting controls, electrical panel boards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Section 309.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Section 309.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Section 309 provided that the counter top is 7 square feet (0.65 m²) maximum.

(Remaining exceptions are renumbered by unchanged)

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Section 309.2 and 309.3.

EXCEPTIONS:

- ~~1. Receptacle outlets serving a dedicated use.~~

- ~~2. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall be required to comply with Sections 309.2 and 309.3.~~
 - ~~3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Sections 309.2 and 309.3 provided that the counter top is 7 square feet (0.65 m²) maximum.~~
1. Receptacle outlets serving a dedicated use.
 2. In a kitchen, only one receptacle outlet shall be required to comply with Sections 309.2

(Remaining exceptions are renumbered by unchanged)

Reason:



Steven Winter Associates, Inc.
Improving the Built Environment Since 1972

61 Washington Street
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Proposal: 10-8-12
1002.9, 1003.9, 1004.9

This discussion focuses on the proposed new language at 1004.9. The discussion also applies to proposed new language at 1002.9 and 1003.9, but to narrow the issue for discussion we choose only to address the Type B dwelling unit language at 1004.9 and hope that the Committee edits proposed language at 1002.9 and 1003.9 accordingly so that compliance with the criteria at these sections is achievable. As it currently exists, language at 1002.9 and 1003.9 is not achievable.¹

The current proposal at 1004.9 is following:

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Section 309.2 and 309.3.

EXCEPTIONS:

1. Receptacle outlets serving a dedicated use.
2. In a kitchen, where two or more receptacle outlets are provided in a kitchen above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall not be required to comply with Sections 309.2 and 309.3.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Sections 309.2 and 309.3 provided that the counter top is 7 square feet (0.65 m²) maximum.

¹ SWA is not addressing compliance Sections 1002.9 or 1003.9 because these sections do not recognize that in Accessible and Type A kitchens, countertops are permitted by the Standard to be installed at 36 inches, above the finished floor (AFF) and are limited to adjustable or lowered heights at two specific areas only; the sink and the work surface; moreover, accessible side reach is limited to 24 inches in Accessible and Type A units; conventional countertop depth of 25 ½ inches is not recognized by the Standard. The result of the language at 1002.9 and 1003.9 is that 100% of countertops must be installed no higher than 34 inches AFF; no deeper than 24 inches for a side approach; and, no deeper than 25 inches for a front approach in order for compliance with language at 1002.9 and 1003.9 to be achievable. Irresponsibly, the commentary on compliance with 1002.9 and 1003.9 offers installation of outlets at the front of base cabinets as a means of achieving compliance. This is preposterous and certainly dangerous for obvious reasons. However, since no language is proposed at 1002.9 and at 1003.9 which would recognize real life kitchen design, i.e., 36 inch high and 25 ½ inch deep countertops, we are not addressing these sections here. As written, the language at 1002.9 and 1003.9 does not work.

HUD provided the following rationale for the language change currently proposed at 10-8- 12:

HUD believes that providing accessible switches and outlets in Accessible, Type A and Type B kitchens is problematic

due to the depth of most of the appliances, as well as the standard overhang of the countertop, which typically creates a depth for the obstruction (countertop and cabinet) of 25 to 25 ½ inches. In addition, the location of the appliances and their related depth, as well as corners or walls, typically makes it difficult if not impossible to achieve a full 48-inch parallel approach at the electrical outlet because the greater depth of the appliance makes it not possible to achieve a close parallel approach. To address this concern, this proposal would require only one electrical receptacle that is located along a length of kitchen countertop to be accessible, irrespective of whether the countertop is interrupted by a sink or appliance. Further, the provisions for kitchen counter tops for accessible and Type A units makes it evident that counter tops other than the one that is the work surface and the one that includes the sink, may be higher than 34 inches, that is, at the standard height of 36 inches. This automatically creates a non-compliance issue for outlets located above the 36-inch high counter tops. The Type B Unit language includes an exception related to the counter top height, and this exception has been added to the Accessible and Type A Units to address this concern.

Proposed language at 1004.9 is not achievable in conventional kitchen design

As HUD states in its rationale at 10-8—12 and as we have maintained ever since the current language made its way into the ANSI A117.1 Standard, 100% compliance with Sections 1004.9 “is difficult if not impossible” to achieve in conventional kitchen design and construction. We have attempted to lay out the issue below and hope that the Committee reconsiders the current and proposed language at 1004.9 (and 1002.9 and 1003.9).

Please consider the following facts:

As stated in the ANSI Standard at Section 101, Purpose: Type B dwelling unit criteria are intended to be consistent with the intent of the criteria of the US Department of Housing and Urban Development (HUD) Fair Housing Accessibility Guidelines.

The FHA Guidelines: Requirement 5, Light Switches, electrical outlets, thermostats and other environmental controls in accessible locations:

Light switches, electrical outlets, thermostats and other environmental controls would meet [this section] if operable parts of the controls are located no higher than 48 inches, and no lower than 15 inches, above the floor. If the reach is over an obstruction between 20 and 25 inches in depth, the maximum height is reduced to 44 inches for a forward approach; or 46 inches for a side approach, provided the obstruction (for example, a kitchen base cabinet) is no more than 24 inches in depth. Obstruction should not extend more than 25 inches from the wall beneath a control.

Note:

Controls or outlets that do not satisfy these specification are acceptable provided that comparable controls or outlets (i.e., that perform the same functions) are provided within the same area and are accessible, in accordance with this guidelines for Requirement 5.

HUD's Fair Housing Act Design Manual, Page 5.8, states the following:

- o Cabinet depth is limited to 24 inches. HUD permits use of a standard 24-inch deep cabinet with an additional extension of 1 to 1 ½ inches for countertops for a maximum depth of 25 ½ inches.
- o “..The drawing in the Guidelines on which this drawing is based (the text refers to the drawing on Page 5.8 of the Design Manual depicting side reach over a kitchen counter), gives this dimension as 34”. The 34” dimension shown in the Guidelines is in no way intended to dictate counter heights in covered dwelling units.

Federal Register, 24 CFR Part 100, Design and Construction Requirements; Compliance With ANSI A117.1 Standards; Final Rule, October 24, 2008; Page 63614:

In making a determination as to whether the design and construction requirements of the Fair Housing Act have been violated, HUD uses the Fair Housing Act, the regulations, and the Guidelines, all of which reference the technical standards found in ANSI A117.1 – 1986.

Based on the above, ANSI 1004.9 and FHA Requirement 5 are aligned in the following ways:

They permit countertops depth at 25½ inches maximum; They permit countertop height at 36 inches maximum;

They require outlets to be installed a maximum of 46 inches, AFF when served by a side approach;

They permit inaccessible outlets over countertops as long as accessible outlets are provided “within the same area;”

Where the ANSI criteria at 1004.9 and FHA Requirement 5 are not aligned is as follows:

1. ANSI criteria at 1004.9 seeks to create accessible outlets over each countertop run when this specific requirement is not contemplated by any of the ten HUD- approved safe harbors for FHA compliance. The proposed language at 1004.9, Exception 3 offers some consideration for outlets over tight corners, but the language at Exception 3 does not work, as proven later in this discussion.
2. ANSI criteria at 1004.9 fails to consider that standard appliances in conventional kitchen design project beyond the front edge of countertops. If the cabinet run between appliances, for example, is less than 48 inches, then the 30 x 48-inch clear floor space cannot be positioned properly such that reach to outlets at the backsplash is possible. When the clear floor space positioned for a parallel approach is "pushed away" from the countertop edge by projecting appliances, compliance with 309.2, Clear Floor Space, is not possible. In order for compliance with 309.2 to be possible, the clear floor space must be aligned with the edge of a countertop that is not deeper than 25½ inches. If this cannot be achieved, then compliance with 309.2 is not achieved. This must be recognized by the Standard.
3. ANSI criteria at 1004.9 do not consider the requirements of the National Electric Code (NEC) in terms of its requirements for locations of outlets above countertops. The NEC requires that a receptacle outlet be installed at each wall countertop space that is 300 mm (12 in.) or wider and that receptacle outlets shall be installed so that no point along the wall line is more than 600 mm (24 in.) measured horizontally from a receptacle outlet in that space. Our suggested language will result in 100% compliance with the NEC.

FHA Requirement 5 does not require accessible outlets over every countertop run

The FHA permits inaccessible outlets to exist as long as there are accessible outlets located "within the same area." The language "within the same area" is HUD's language (see Guidelines, Requirement 5). There is no language in the FHA or any of the safe harbors, including the Guidelines, i.e., what HUD uses to determine whether the Act has been violated, which contemplates that if an inaccessible outlet exists over a run of countertop, that an accessible outlet must be provided over the same run of countertop. Yet, HUD's "within the same area" has translated into ANSI A117.1 language at 1004.9 requiring that where countertops are served by inaccessible outlets, an accessible outlet must be provided over the same run of countertop. This is certainly "difficult, if not impossible" to achieve.

If an inaccessible outlet is located above a run of countertop on one side of the range, and an accessible outlet is installed five feet away (measured along the wall), but above the run of countertop on the other side of the range, wouldn't the accessible outlet located on one side of the range be located "within the same area" as the inaccessible outlet, even though they are located above two different countertop runs? Separated by only 5 feet, in this case? The answer is "Yes," in our opinion. They are both "within the same area" even though they are located over two different countertops. If the intent was to have accessible outlets serve every countertop run then why would HUD not specify that requirement under Requirement 5? I think it was the intent to allow flexibility in the interpretation of "within the same area." There is no other rationale.

Similarly, wouldn't compliance with the FHA be achieved if an accessible outlet was located above the countertop adjacent to the sink (over the adjacent dishwasher, for example) while an inaccessible outlet exists on the other side of the sink (over a 12-inch wide countertop sandwiched between the sink and the adjacent refrigerator, for example)? The answer is "Yes;" both outlets are located "within the same area," even though they are located over two different countertops.

If the clear floor space is not aligned with the countertop edge, compliance with 309.2 as triggered by 1004.9 is not possible

Compliance with proposed language at 1004.9, exceptions 2 and 3 is not possible to achieve if countertops less than 48 inches are located between appliances which project beyond the front edge of the countertop; when they project beyond the front edge of a standard 25½-inch deep countertop, they essentially "push" the clear floor space required by 309.2 (1004.9, Exception 2) too far away from the edge of the countertop rendering the outlet installed at the backsplash unreachable and inaccessible.

For example, if an outlet was located over a 27-inch wide base cabinet (assume 25½-inch deep conventional countertop) flanked on one side by a refrigerator, which projects beyond the countertop edge by 4 inches, and a range on the other side, which projects beyond the front edge of the countertop by 2 inches; then 48-inch long clear floor space positioned for a side approach to the outlet will never be close enough to the edge of the countertop such that the outlet located over it is reachable (see Fig. A). Essentially, accessible reach supported by a side approach in Type B units cannot be achieved unless there is enough space to align the 48-inch long clear floor space such that it is not "pushed" away from the front edge of the countertop by obstructions such as appliances or walls (see Fig. B).

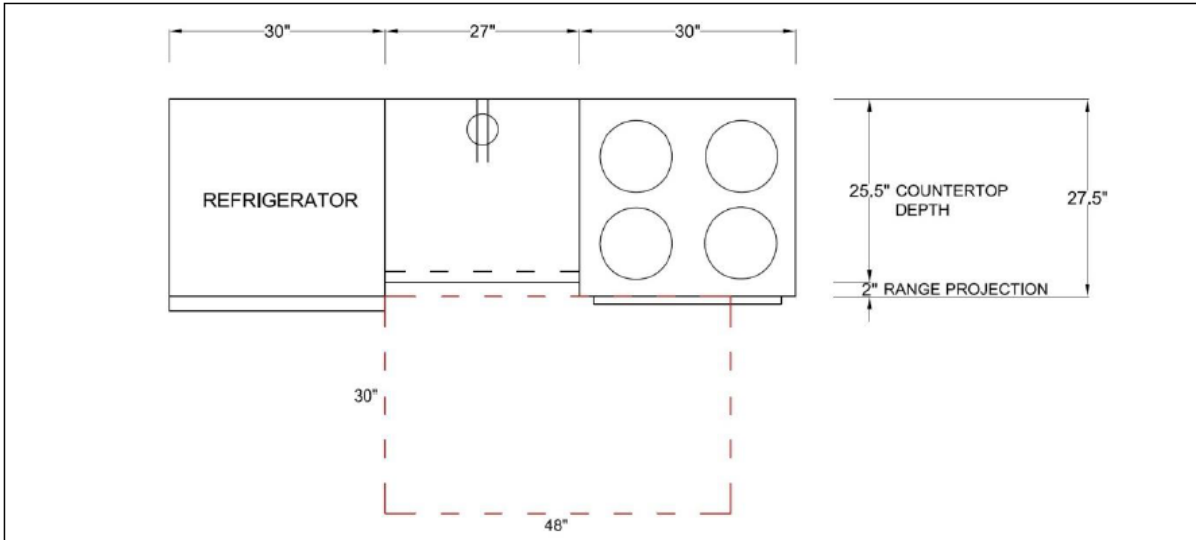


FIG. A
 DISTANCE FROM OUTLET TO CFS IS 27 $\frac{1}{2}$ "
 COMPLIANCE WITH 309.2 CANNOT BE ACHIEVED AS A
 RESULT OF THE PROJECTING RANGE

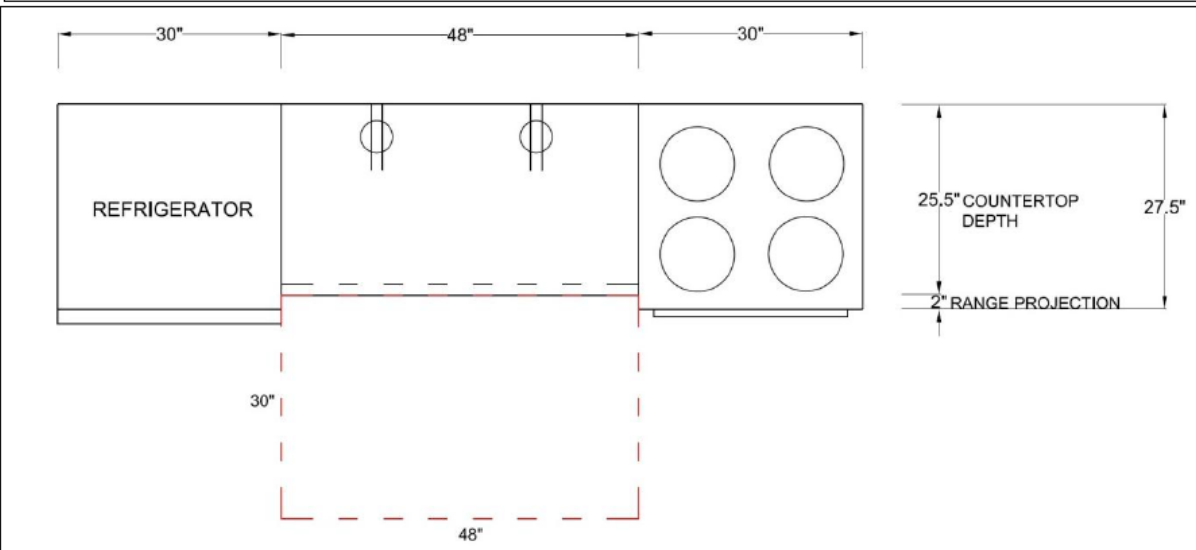


FIG. B
 COMPLIANCE WITH 309.2 CAN BE ACHIEVED, BUT ONLY
 WHEN THE SPACE BETWEEN PROJECTING APPLIANCES IS
 AT LEAST 48"

Section 1004.9, Exception 2 certainly is improved in that only one of a number of outlets serving a run of countertop uninterrupted by a sink or appliance is required to be accessible; whereas, before only one was permitted to be inaccessible. However, it does not go far enough. Exception 3 attempts to provide an exception for corner countertops recognizing that the clear floor space cannot be positioned at tight corners flanked by appliances, but again, it doesn't go far enough. Exception 3 contemplates difficulty with achieving compliance only when appliances (range and refrigerator) flank a tight corner. Again, compliance cannot be achieved if there is not enough space on one or both legs of the corner (measured along the front edge of the countertop) to

FIG. C

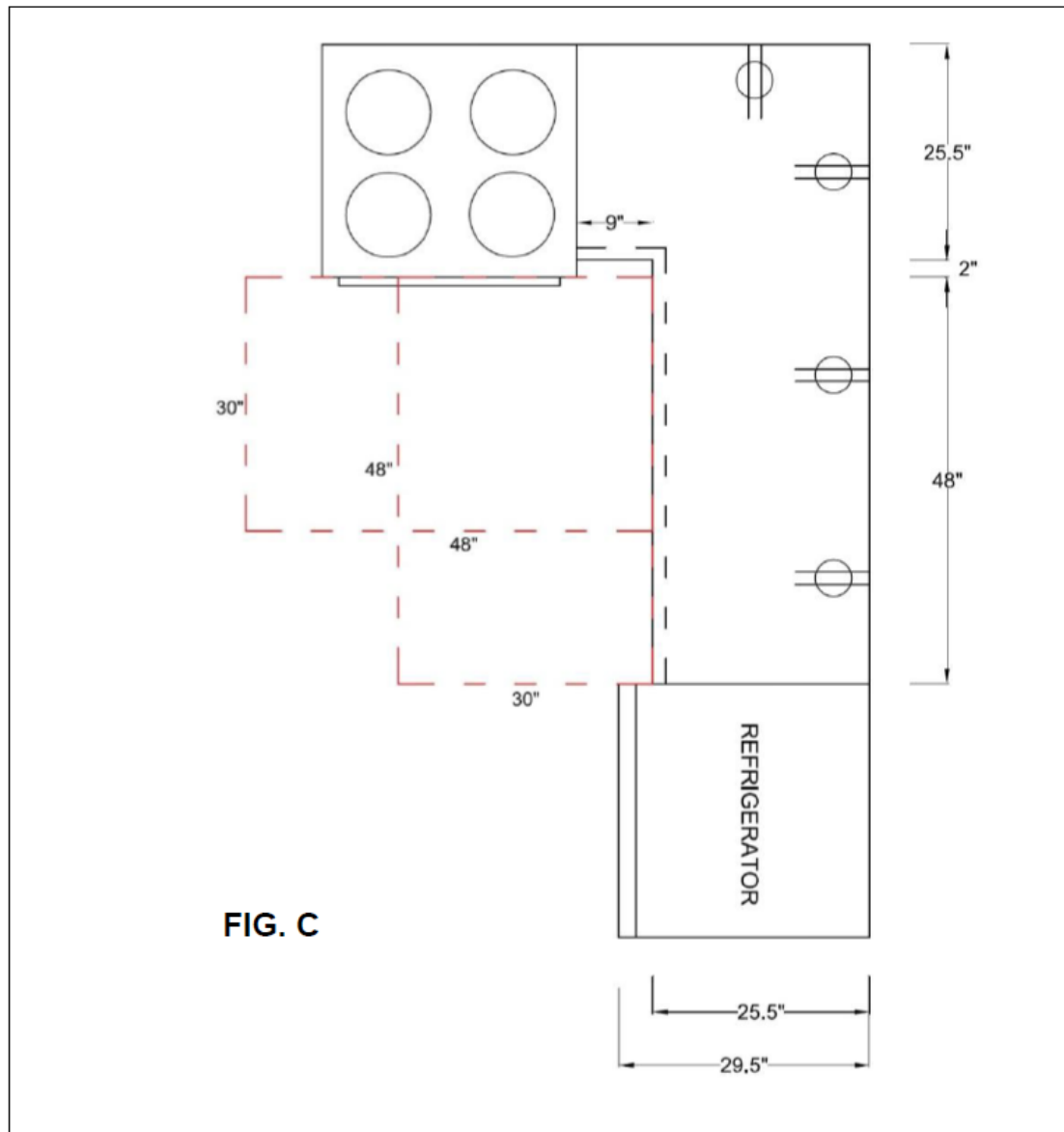
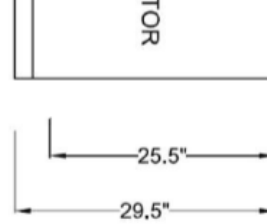


FIG. C

Moreover, at 1004.9, there is proposed countertop area limit of 7 sq ft., i.e., corner countertops less than 7 sq. ft. in area are exempt from the requirements. For one, the square footage limit does not make sense and should be revisited. When the 48-inch long side of the clear floor space is centered on a conventional 30-inch wide range, that leaves a minimum of 9 inches of countertop to the left = 48 inch centered side approach). If the countertop to the right of the range is a corner countertop, that means the front edge of the countertop must be a minimum of 9 inches before it 'returns.' In order for the 7 sq ft max countertop area to be achieved and compliance over the corner countertops therefore exempt, the 'return' must be no more than 5.03 inches. (see Fig. D). Further, the red crosshatched area is the encroachment into the centered clear floor space at the range by the refrigerator when both appliance project beyond the edge of the countertop and flank a tight inside corner of exactly 7 sq ft in area. This are limit of 7 sq ft. does not work and should be deleted from the current proposed language.

inches, AFF, when served by a side approach (309.3); and, only one outlet to comply with the 309.2. This is 100% achievable.

More often than not, the sink is adjacent to a dishwasher in most conventional kitchens. If we use a common 27-inch sink base adjacent to a 30-inch dishwasher as an example to illustrate the point, then that means that the sink top and adjacent countertop over the dishwasher will be 57 inches, minimum. This is commonly the only area in a kitchen which is consistently available to position the 48-inch long side of the clear floor space flush with the edge of the countertop for the entire 48-inches. An outlet at the backsplash in this location (assuming that the countertop is not deeper than 25½ inches) is certainly "within the same area" as other inaccessible outlets which serve nearby countertops thereby achieving compliance with Requirement 5 of the Guidelines.

Finally, our proposed language will always result in compliance with the NEC since the NEC will always require an outlet to be located over a countertop against which a 30 x 48-inch clear floor space can be positioned for a side approach, i.e., outlets can never be more than 24 inches apart measured along the wall line.

We implore the committee to consider our proposed language to better develop language at 1002.9 and 1003.9.

EXHIBIT A
NEC Requirements for Countertop Outlets

such permanently installed heaters. Such receptacle outlets shall not be connected to the heater circuits.

Informational Note: Listed baseboard heaters include instructions that may not permit their installation below receptacle outlets.

(A) General Provisions. In every kitchen, family room, dining room, living room, parlor, library, den, sunroom, bedroom, recreation room, or similar room or area of dwelling units, receptacle outlets shall be installed in accordance with the general provisions specified in 210.52(A)(1) through (A)(3).

(1) Spacing. Receptacles shall be installed such that no point measured horizontally along the floor line of any wall space is more than 1.8 m (6 ft) from a receptacle outlet.

(2) Wall Space. As used in this section, a wall space shall include the following:

- (1) Any space 600 mm (2 ft) or more in width (including space measured around corners) and unbroken along the floor line by doorways and similar openings, fireplaces, and fixed cabinets
- (2) The space occupied by fixed panels in exterior walls, excluding sliding panels
- (3) The space afforded by fixed room dividers, such as freestanding bar-type counters or railings

(3) Floor Receptacles. Receptacle outlets in floors shall not be counted as part of the required number of receptacle outlets unless located within 450 mm (18 in.) of the wall.

(4) Countertop Receptacles. Receptacles installed for countertop surfaces as specified in 210.52(C) shall not be considered as the receptacles required by 210.52(A).

(B) Small Appliances.

(1) Receptacle Outlets Served. In the kitchen, pantry, breakfast room, dining room, or similar area of a dwelling unit, the two or more 20-ampere small-appliance branch circuits required by 210.11(C)(1) shall serve all wall and floor receptacle outlets covered by 210.52(A), all countertop outlets covered by 210.52(C), and receptacle outlets for refrigeration equipment.

Exception No. 1: In addition to the required receptacles specified by 210.52, switched receptacles supplied from a general-purpose branch circuit as defined in 210.70(A)(1), Exception No. 1, shall be permitted.

Exception No. 2: The receptacle outlet for refrigeration equipment shall be permitted to be supplied from an individual branch circuit rated 15 amperes or greater.

(2) No Other Outlets. The two or more small-appliance branch circuits specified in 210.52(B)(1) shall have no other outlets.

Exception No. 1: A receptacle installed solely for the electrical supply to and support of an electric clock in any of the rooms specified in 210.52(B)(1).

Exception No. 2: Receptacles installed to provide power for supplemental equipment and lighting on gas-fired ranges, ovens, or counter-mounted cooking units.

(3) Kitchen Receptacle Requirements. Receptacles installed in a kitchen to serve countertop surfaces shall be supplied by not fewer than two small-appliance branch circuits, either or both of which shall also be permitted to supply receptacle outlets in the same kitchen and in other rooms specified in 210.52(B)(1). Additional small-appliance branch circuits shall be permitted to supply receptacle outlets in the kitchen and other rooms specified in 210.52(B)(1). No small-appliance branch circuit shall serve more than one kitchen.

(C) Countertops. In kitchens, pantries, breakfast rooms, dining rooms, and similar areas of dwelling units, receptacle outlets for countertop spaces shall be installed in accordance with 210.52(C)(1) through (C)(5).

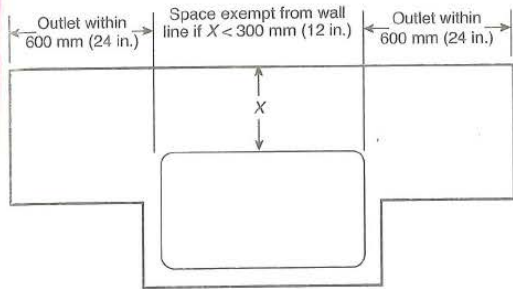
(1) Wall Countertop Spaces. A receptacle outlet shall be installed at each wall countertop space that is 300 mm (12 in.) or wider. Receptacle outlets shall be installed so that no point along the wall line is more than 600 mm (24 in.) measured horizontally from a receptacle outlet in that space.

Exception: Receptacle outlets shall not be required on a wall directly behind a range, counter-mounted cooking unit, or sink in the installation described in Figure 210.52(C)(1).

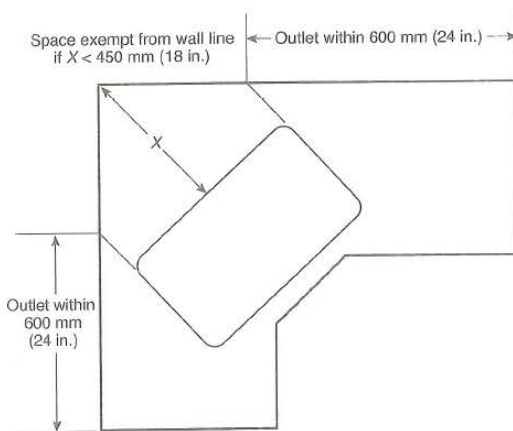
(2) Island Countertop Spaces. At least one receptacle shall be installed at each island countertop space with a long dimension of 600 mm (24 in.) or greater and a short dimension of 300 mm (12 in.) or greater.

(3) Peninsular Countertop Spaces. At least one receptacle outlet shall be installed at each peninsular countertop space with a long dimension of 600 mm (24 in.) or greater and a short dimension of 300 mm (12 in.) or greater. A peninsular countertop is measured from the connecting edge.

(4) Separate Spaces. Countertop spaces separated by rangetops, refrigerators, or sinks shall be considered as separate countertop spaces in applying the requirements of 210.52(C)(1). If a range, counter-mounted cooking unit, or sink is installed in an island or peninsular countertop and the depth of the countertop behind the range, counter-mounted cooking unit, or sink is less than 300 mm (12 in.), the range, counter-mounted cooking unit, or sink shall be considered to divide the countertop space into two separate countertop spaces. Each separate countertop space shall comply with the applicable requirements in 210.52(C).



Range, counter-mounted cooking unit extending from face of counter



Range, counter-mounted cooking unit mounted in corner

Figure 210.52(C)(1) Determination of Area Behind a Range, or Counter-Mounted Cooking Unit or Sink.

(5) **Receptacle Outlet Location.** Receptacle outlets shall be located on or above, but not more than 500 mm (20 in.) above, the countertop. Receptacle outlet assemblies listed for the application shall be permitted to be installed in countertops. Receptacle outlets rendered not readily accessible by appliances fastened in place, appliance garages, sinks, or rangetops as covered in 210.52(C)(1), Exception, or appliances occupying dedicated space shall not be considered as these required outlets.

Informational Note: See 406.5(E) for requirements for installation of receptacles in countertops.

Exception to (5): To comply with the conditions specified in (1) or (2), receptacle outlets shall be permitted to be mounted not more than 300 mm (12 in.) below the countertop. Receptacles mounted below a countertop in accordance with this exception shall not be located where the countertop extends more than 150 mm (6 in.) beyond its support base. **OVERHANG**

(1) **Construction for the physically impaired**

(2) **On island and peninsular countertops where the countertop is flat across its entire surface (no backsplashes, dividers, etc.) and there are no means to mount a receptacle within 500 mm (20 in.) above the countertop, such as an overhead cabinet**

(D) **Bathrooms.** In dwelling units, at least one receptacle outlet shall be installed in bathrooms within 900 mm (3 ft) of the outside edge of each basin. The receptacle outlet shall be located on a wall or partition that is adjacent to the basin or basin countertop, located on the countertop, or installed on the side or face of the basin cabinet not more than 300 mm (12 in.) below the countertop. Receptacle outlet assemblies listed for the application shall be permitted to be installed in the countertop.

Informational Note: See 406.5(E) for requirements for installation of receptacles in countertops.

(E) **Outdoor Outlets.** Outdoor receptacle outlets shall be installed in accordance with (E)(1) through (E)(3). [See 210.8(A)(3).]

(1) **One-Family and Two-Family Dwellings.** For a one-family dwelling and each unit of a two-family dwelling that is at grade level, at least one receptacle outlet accessible while standing at grade level and located not more than 2.0 m (6½ ft) above grade shall be installed at the front and back of the dwelling.

(2) **Multifamily Dwellings.** For each dwelling unit of a multifamily dwelling where the dwelling unit is located at grade level and provided with individual exterior entrance/egress, at least one receptacle outlet accessible from grade level and not more than 2.0 m (6½ ft) above grade shall be installed.

(3) **Balconies, Decks, and Porches.** Balconies, decks, and porches that are accessible from inside the dwelling unit shall have at least one receptacle outlet installed within the perimeter of the balcony, deck, or porch. The receptacle shall not be located more than 2.0 m (6½ ft) above the balcony, deck, or porch surface.

(F) **Laundry Areas.** In dwelling units, at least one receptacle outlet shall be installed for the laundry.

Exception No. 1: In a dwelling unit that is an apartment or living area in a multifamily building where laundry facilities are provided on the premises and are available to all building occupants, a laundry receptacle shall not be required.

Exception No. 2: In other than one-family dwellings where laundry facilities are not to be installed or permitted, a laundry receptacle shall not be required.

10-10– 12

Add new text as follows:

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Sections 1002.9 and 309.

EXCEPTIONS: *(remain unchanged)*

1002.9.1 Wheelchair Charging Area. A wheelchair charging area shall be adjacent to one bed. A clear floor space complying with Section 305 shall be located between the bedside and a parallel wall. The parallel wall shall be 36 inches (915 mm) minimum to 48 inches (1220 mm) maximum from the bed and provide a 110V duplex receptacle outlet located 24 inches (610 mm) minimum and 48 inches (1220 mm) maximum from the head wall of the bed and complying with Section 1002.9.

Exception: Where there is no parallel wall within 36 inches (915 mm) minimum to 48 inches (1220 mm) maximum of the bedside, a clear floor space complying with Section 305 shall be along the wall at the head of one bed. A 110V duplex receptacle outlet complying with Section 1002.9 shall be located along the wall at the bed head and within 24 inches (610 mm) minimum and 48 inches (1220 mm) maximum of the bedside.

106 Definitions

wheelchair charging area: A clear floor area where people with disabilities can recharge their wheelchair batteries.

10-10-12 PC1

Kimberly Paarlberg, – representing International Code Council

Further revise as follows:

1002.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, operating hardware for operable windows, plumbing fixture controls, and user controls for security or intercom systems shall comply with Sections 1002.9 and 309.

EXCEPTIONS: *(remain unchanged)*

1002.9.1 Wheelchair Charging Area. A wheelchair charging area shall be located adjacent to one bed. A clear floor space complying with Section 305 shall be ~~located between the bedside and a parallel wall.~~ The parallel wall shall be 36 inches (915 mm) minimum to 48 inches (1220 mm) maximum from the bed and provide a 110V duplex receptacle outlet located 24 inches (610 mm) minimum and 48 inches (1220 mm) maximum from the head wall of the bed and complying with Section 1002.9 positioned for parallel approach to the side of the bed.

Exception: ~~Where there is no parallel wall within 36 inches (915 mm) minimum to 48 inches (1220 mm) maximum of the bedside, a clear floor space complying with Section 305 shall be along the wall at the head of one bed. A 110V duplex receptacle outlet complying with Section 1002.9 shall be located along the wall at the bed head and within 24 inches (610 mm) minimum and 48 inches (1220 mm) maximum of the bedside.~~

106 Definitions

wheelchair charging area: A clear floor area where people with disabilities can recharge their wheelchair batteries.

Reason: I understand the reasoning for the charging station in Accessible rooms. However, I think the wording could be a little cleaner and use the building blocks for sizes and heights.

10-10-12 PC2

Chad Beebe, – representing American Society for Healthcare Engineering (ASHE)

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to our attention that several of the proposed changes will have a significantly negative impact to the healthcare industry design/built environment of buildings designed under the 2015 IBC. Further, it is our understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As we do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and since we question the authenticity of the underlying premise used to make such changes, we respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months so that further collaboration can be conducted with all interested parties. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

10-10-12 - The addition for electric wheelchair charging stations in all Accessible units.

These new requirements would add thousands of required square feet to a new hospital and significantly impact any renovations to an existing hospital by requiring increased patient room sizes to meet the new requirements and thus, due to the fixed square footage within the building foot print, will reduce the number of allowable beds the hospital can maintain. With hospital construction cost averaging around \$300.00 per square foot these additional increases in square footage will significantly impact the cost of construction. Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

10-10-12 PC3

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentile, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to my attention that several of the proposed changes (ratified by this Committee) will have a significantly negative impact to the design/built environment of buildings designed under the 2015 IBC. Further, it is my understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As I do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and I question the authenticity of the underlying premise used to make such changes, I respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months.

If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

10-13– 12

Add new text as follows:

1002.15.3 Bed Height. At least one bed shall measure 17 to 23 inches (430 to 585 mm) high from the floor to the top of the mattress, whether or not the mattress is compressed.

10-13-12 PC1

Kimberly Paarlberg, – representing ICC

Further revise as follows:

1002.15.3 Bed Height. At least one bed shall measure 17 to 23 inches (430 to 585 mm) high from the floor to the top of the mattress, ~~whether or not the mattress is compressed.~~

Reason: If the mattress complies when not compressed, then the language is not needed. What happens if the mattresses compresses to less than 17 inches? The amount of compressions depends on the weight of the person lying down. How would you measure that consistently?

10-13-12 PC2

Minh N. Vu, – representing American Hotel & Lodging Association

Delete without substitution.

Reason: The ANSI Committee has proposed a new requirement that at least one (1) bed in an accessible sleeping unit be 17"-23" high, "whether or not the mattress is compressed." (Section 1002.15.3). The American Hotel & Lodging Association (hereinafter, the "AH&LA" (1)) opposes the adoption of any bed height requirement at this time. The United States Department of Justice (hereinafter, the "DOJ") is working on a proposed rule under Title III of the Americans with Disabilities Act of 1990 (hereinafter, the "ADA") for bed heights in accessible lodging facilities, as well as a proposed rule for accessible furniture more generally that would apply to beds in nursing homes, hospitals and dormitories. The AH&LA encourages the ANSI Committee to work with the DOJ to develop a clear and consistent rule. If the ANSI Committee moves forward with this proposed requirement, states adopting this version of the ANSI may have bed height rules that conflict with the ADA standard ultimately issued by DOJ. Owners will be subject to potentially conflicting requirements which will cause confusion, unnecessary expense, and compliance difficulties.

The AH&LA also objects to the rule as drafted because it is vague and virtually impossible to objectively implement. The proposed requirement is that at least one (1) bed in an accessible sleeping unit have a height of 17"-23", "whether or not the mattress is compressed." (Section 1002.15.3). This rule raises a host of unanswered questions: How heavy should the person compressing the mattress be? How far from the edge of the bed will the height be measured? Where should the person compressing the mattress be located when a measurement is taken? Is the measurement taken from the top of the bedding or to the top of the mattress without bedding? The ANSI Committee should work with the DOJ to determine the answer to these questions before issuing any standard on this issue. The American Hotel & Lodging Association is a membership organization that represents the interests of every segment of the lodging industry, including REITs, brand, franchisee, management companies, independent property owners, and state associations

1. The American Hotel & Lodging Association is a membership organization that represents the interests of every segment of the lodging industry, including REIT's, brand, franchise, with management companies, independent property owners, and state associations.

10-16 – 12

Revise as follows:

1003.5 Doors and Doorways. The primary entrance door to the unit, and all other doorways intended for user passage, shall comply with Section 404.

EXCEPTIONS:

- ~~1. Thresholds at exterior sliding doors shall be permitted to be 3/4 inch (19 mm) maximum in height, provided they are beveled with a slope not greater than 1:2.~~
2. 1. In toilet rooms and bathrooms not required to comply with Section 1003.11.2, maneuvering clearances required by Section 404.2.3 are not required on the toilet room or bathroom side of the door.

- ~~3.~~ 2. A turning space between doors in a series as required by Section 404.2.5 is not required.
- ~~4.~~ 3. Storm and screen doors are not required to comply with Section 404.2.5.
- ~~5.~~ 4. Communicating doors between individual sleeping units are not required to comply with Section 404.2.5.
- ~~6.~~ 5. At other than the primary entrance door, where exterior space dimensions of balconies are less than the required maneuvering clearance, door maneuvering clearance is not required on the exterior side of the door.

10-16-12 PC1

Larry Perry, – representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: Inadequate substantiation has been provided for the deletion of this exception, which has been in the A117.1 Standard since 1986. The proposal stated that this exception is not permitted by ADA; while that is accurate, the A117.1 Type A unit is not, and never was, intended to be an ADA compliant unit. The residential dwelling unit provisions in the new ADA standards are a new type of unit, falling somewhere between an A117.1 'Accessible' and 'Type A' unit. The vast, vast majority of projects that will require 'Type A' units will be multi-family residential projects where the ADA standards are not applicable; therefore, there is no conflict.

The exception should be put back into the standard.

10-21– 12

Revise as follows:

1003.12.4.1 Clear Floor Space. A clear floor space, positioned for a forward approach to the sink, shall be provided. Knee and toe clearance complying with Section 306 shall be provided.

EXCEPTIONS:

1. The requirement for knee and toe clearance shall not apply to more than one bowl of a multi-bowl sink.
2. Cabinetry shall be permitted to be added under the sink, provided the following criteria are met:
 - (a) The cabinetry can be removed without removal or replacement of the sink,
 - (b) The floor finish extends under the cabinetry, and
 - (c) The walls behind and surrounding the cabinetry are finished.
3. A parallel approach complying with Section 305 and centered on the sink, shall be permitted at a kitchen sink in a space where a cook top or conventional range is not provided.
4. A parallel approach complying with Section 305 and centered on the sink, shall be permitted at wet bars.

10-21-12 PC1

Harold Kiewel, representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: See previous Comments at 8-13 - 12 and 9-2 - 12

10-30 – 12

Revise as follows:

1004.11.3.1.3.3 Shower Compartment. If a shower compartment is the only bathing facility, the shower compartment shall have dimensions of 36 inches (915 mm) minimum in width and 36 inches (915 mm) minimum in depth. A clearance of 48 inches (1220 mm) minimum in length, measured perpendicular from the shower head wall, and 30 inches (760 mm) minimum in depth, measured from the face of the shower compartment, shall be provided. ~~Reinforcing for a shower seat is not required in shower compartments larger than 36 inches (915 mm) in width and 36 inches (915 mm) in depth.~~

10-30-12 PC1

Harold Kiewel, representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: NO ! NO ! NO ! Showers are either 36 x 36 (transfer type) or roll-in which are much larger and more flexible. The standard cannot say 36-minimum by 36-minimum, because we'll get 40 x 42 showers with an 8-inch gap between the clear floor space and the shower bench, and a 42-inch reach from the shower bench to the controls - it doesn't work. The shower has to be one or the other, designers can't be left to their own imaginations - they still don't get it !! And, what's this "*clearance*" thing? If you mean a 30 x 48 clear floor space, say so; keep the language clear and consistent; this is technical writing not a creative writing exercise.

10-31– 12

Revise as follows:

1004.11.3.1.3.3 Shower Compartment. If a shower compartment is the only bathing facility, the shower compartment shall have dimensions of 36 inches (915 mm) minimum in width and 36 inches (915 mm) minimum in depth. A clearance of 48 inches (1220 mm) minimum in length, measured perpendicular from the shower head wall, and 30 inches (760 mm) minimum in depth, measured from the face of the shower compartment, shall be provided. Reinforcing for a shower seat is not required in shower compartments larger than 36 inches (915 mm) in width and 36 inches (915 mm) in depth.

EXCEPTION: A shower compartment with dimensions of 30 inches (760 mm) minimum in depth and 44 inches (1120 mm) minimum in width shall be permitted.

10-31-12 PC1

Harold Kiewel, representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: NO ! ! don't buy it ! see Comment at 10-30 - 12

10-35– 12

Revise as follows:

1004.12.2.5 Refrigerator/Freezer. ~~A clear floor space, positioned for a parallel approach to the refrigerator/freezer, shall be provided. The centerline of the clear floor space shall be offset 24 inches (610 mm) maximum from the centerline of the appliance. The refrigerator/freezer shall comply with Section 1004.12.2.5.~~

1004.12.2.5.1 Approach. A clear floor space positioned for a parallel or forward approach to the refrigerator/freezer shall be provided.

1004.12.2.5.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the centerline of the clear floor space shall be offset 15 inches (380 mm) maximum from the centerline of the appliance.

1004.12.2.5.3 Parallel Approach. Where the clear floor space is positioned for a parallel approach, the centerline of the clear floor space shall be offset 24 inches (610 mm) maximum from the centerline of the appliance.

10-35-12 PC1

Harold Kiewel, representing self

Further revise as follows:

1004.12.2.5.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the centerline of the clear floor space shall be offset ~~45~~ 10 to 16- inches (380 mm) ~~maximum~~ towards the latch from the centerline of the appliance.

1004.12.2.5.3 Parallel Approach. Where the clear floor space is positioned for a parallel approach, the centerline of the clear floor space shall be offset 16- to 24 inches (610 mm) ~~maximum~~ towards the latch from the centerline of the appliance.

Reason: I am opposed to changing dimensions to non-modular (odd) numbers. I believe that dimensional requirements of the Standard should, to the maximum extent practicable, be modular in both Imperial and metric (SI) systems. Imperial dimensions should be multiples 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 those lines.

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

10-38– 12

Revise as follows:

1003.11.2.5.1 Bathtub. Bathtubs shall comply with Section 607.

EXCEPTIONS:

~~1. The removable in-tub seat required by Section 607.3 is not required.~~

2 1.. Counter tops and cabinetry shall be permitted at one end of the clearance, provided the following criteria are met:

- (a) The countertop and cabinetry can be removed;
- (b) The floor finish extends under the countertop and cabinetry; and
- (c) The walls behind and surrounding the countertop and cabinetry are finished.

10-38-12 PC1

Chad Beebe, – representing American Society for Healthcare Engineering (ASHE)

Disapprove the change. Return the text to that found in existing standard.

Reason: In review of the 2014 Final Draft of the ICC A117.1 document, it has come to our attention that several of the proposed changes will have a significantly negative impact to the healthcare industry design/built environment of buildings designed under the 2015 IBC. Further, it is our understanding that the overwhelming majority of these changes have been derived from a single uncorroborated report which has neither been properly vetted nor adopted by any other credible agency or (similar) jurisdictional body.

As we do not feel these dramatic and substantial changes have been given proper and appropriate consideration by all interested stakeholders in this process, and since we question the authenticity of the underlying premise used to make such changes, we respectfully request they either be removed entirely from consideration in this draft, or that the entire draft adoption process be held in abeyance for a minimum of 12-months so that further collaboration can be conducted with all interested parties. If the Committee opts to delay this process for 12-months, it will be in keeping with the mission of the ICC, and best assure that all parties can be provided with the opportunity to reasonably participate in this process.

10-38-12 - A new requirement to install a bathtub seat in all Type A units.

These new requirements would add thousands of required square feet to a new hospital and significantly impact any renovations to an existing hospital by requiring increased patient room sizes to meet the new requirements and thus, due to the fixed square footage within the building foot print, will reduce the number of allowable beds the hospital can maintain. With hospital construction cost averaging around \$300.00 per square foot these additional increases in square footage will significantly impact the cost of construction. Thank you for your consideration of this request, and in keeping alive the goals and mandates of the entire ICC organization and membership.

10-38-12 PC2

Tony Ewalt, representing Sletten Construction of Nevada, Inc.; Michael Gentile, representing Philip Chun North America, Inc.; Michael McGettigan, representing Terracon Consultant; Robert W. Potter, Construction Company, representing Affordable Concepts; Eric J. Rowland, representing Rowland Design;

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10-38-12 PC3

Larry Perry, – representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: This exception was deleted with the rationale that the standard does not include a similar exception for built-in tub seats. If the standard permits grab bars to be installed after initial construction, and allows a removable base cabinet in the knee/toe space under the bathroom lavatory, why is it critical that a movable seat be provided at initial construction?