



COMMITTEE ACTION REPORT

FIRST PUBLIC REVIEW DRAFT – PUBLIC COMMENTS

This report contains the preliminary actions of the ASC/ICC A117.1 Committee regarding Public Comments received on the First Public Review Draft

AUGUST 21, 2014

ASC/ICC A117.1 STANDARD

DEVELOPMENT - 2015 EDITION*

The preliminary actions contained in this report will be subject to written ballot of the Committee members. Based on the ballots received, the actions will be finalized.

**Considered by the A117.1 Committee
January 21 – 24, 2014 and July 14 -16, 2014
U.S. Access Board Conference Room
Washington, DC.**

**ICC A117.1 Standard – Accessible and Usable Buildings and Facilities
2012 to 2015* Development Cycle.**

Chronology

	Date	Event.	
1.	2012	Notice	Call for proposal to amend the 2009 edition of the ASC/ICC A117.1 Standard.
2.	July 2012	Publish	New Proposals to amend standard published.
3.	August 27-31, 2012 January 14-18, 2013	Meetings	Committee consideration of new proposals.
4.	March 12, 2013	Publish	Committee Action Report (CAR) actions on proposed changes
5	April 19, 2013	Notice	Proponents of new proposals notified of Committee's action and their opportunity to comment.
6	March-May 2013	Ballot	Committee confirms actions of CAR or provides negative ballot comment
7	June 14, 2013	Publish	Ballot Comment and Proponent Comment Agenda
8	July 15-19, 2013	Meeting	Committee consideration of Ballot and Proponent Comments.
9	August 7, 2013	Publish	Committee Action Report (CAR) on Ballot and Proponent Comments
10	September 20, 2013	Notice	Proponents asked if their issue has been resolved by the committee's action
11	August-October, 2013	Ballot	Committee confirms actions of CAR (actions published 8/7/13)
12	October 25, 2013	Publish	First Public Review Draft – Open draft for public comments
13	December 23, 2013	Publish	Public Comment Report – Comments on First Public Review Draft
14	January 3, 2014	Publish	Unresolved Issues Report
15	January 21-24, 2014 July 14-16, 2014	Meetings	Committee consideration of Public Comment Report and Unresolved Issues Report
16	August 21, 2014**	Publish	Committee Action Reports (CAR) on Public Comments and Unresolved Issues Reports

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.

Committee Action Report on Public Comments Received on First Public Review Draft
January 21 -24, 2014 and July 14-16, 2014

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
Items 1-1-12 through 1-10-12
August 21, 2014.

This is one of eight documents containing the preliminary actions of the A117.1 Committee regarding public comments received on the First Public Review Draft (October 2013) of proposed changes to the A117.1 Standard, 2009 edition. Each item was discussed at the meeting of Committee during the weeks of January 21st and July 14th of 2014, in Washington D.C. The Committee took action on each public comment and such action is specified herein. The actions listed here are subject reconfirmation by the Committee via the Committee's ballot process.

Please note: This document does not contain proposals for which no comments were received. Those proposals, and the Committee decision on each one, can be viewed in the Committee Action Report (CAR) under the title: First Draft Standard Development at this following location: <http://www.iccsafe.org/cs/standards/A117/Pages/default.aspx>

Chapter 1

1-1 – 12

(This represents the language approved by the committee for the First Public Review Draft)

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 document. 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.

Committee Action Report on Public Comments Received on First Public Review Draft
January 21 -24, 2014 and July 14-16, 2014

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.

Committee action on 1-1-12 PC1

Disapprove Public Comment 1-1-12 PC1

Reason: The proposed change is not consistent with the traditional style and format of this standard and standards and codes in general.

1-4 – 12

(This represents the language approved by the committee for the First Public Review Draft)

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.

Committee action on 1-4-12 PC1

Approve Public Comment 1-4-12 PC1.

Reason: The committee concurred with the reason provided by Mr. Perry. Further they concluded that the change improved the standard.

1-5 – 12

(This represents the language approved by the committee for the First Public Review Draft)

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.

Committee action on 1-5-12 PC1

Disapprove Public Comment 1-5-12 PC1.

Reason: The comment did not provide a specific proposal for revision. The Committee did not find Mr. Kiewel’s comment led to any changes to the standard as currently proposed.

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.

Committee action on 1-5-12 PC2

Disapprove Public Comment 1-5-12 PC2.

Reason: The comment did not provide a specific proposal for revision. The Committee did not find Mr. Larson’s or Mr. Rasmussen’s comments led to any changes to the standard as currently proposed.

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.

Committee Action Report on Public Comments Received on First Public Review Draft
January 21 -24, 2014 and July 14-16, 2014

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".

Committee action on 1-5-12 PC3

Disapprove Public Comment 1-5-12 PC3.

Reason: The Committee concluded that the existing text was important of compliance with the standard; that it is used for numerous provisions and should remain. Remove the text would put the standard out of coordination with the 2010 ADA.

1-7– 12

(This represents the language approved by the committee for the First Public Review Draft)

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.*

Committee action on 1-7-12 PC1

Disapprove Public Comment 1-7-12 PC1.

Reason: The comment did not provide a specific proposal for revision. The Committee did not find Mr. Larson's comment led to any changes to the standard as currently proposed.

1-10 – 12

(This represents the language approved by the committee for the First Public Review Draft)

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.

Committee action on 1-10-12 PC1

Approve Public Comment 1-10-12 PC1.

Reason: The committee concurred with the reason provided by Mr. Perry. The definition added no clarity to the standard and is not needed.

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.

Committee action on 1-10-12 PC2

Approve Public Comment 1-10-12 PC2.

Reason: The committee concurred with the reason provided by Mr. Wiehle. Further they concluded that the definition is inconsistent with the ADA/ABA and shouldn't be included in the standard.