

Mike Pfeiffer

From: David Cooper <coderep@stairways.org>
Sent: Tuesday, August 11, 2020 3:12 PM
To: Mike Pfeiffer
Subject: Appeal for committee reconsideration of RB116

ICC Appeals Board

Attn: Michael Pfeiffer

RE: Appeal for committee reconsideration of RB116-19

Please consider this a request to participate in the appeal hearing for committee reconsideration of RB116.

Comment:

Our review of the original proposal, the public comment, the hearing videos and the appellants statement finds no empirical evidence that supports the change in the current IRC regulations for riser height and tread depth as would be effective if the proposed substitution of NFPA 101 were enacted. The largest portion of our housing stock has been built to codes that pale when compared to the current IRC. To this day most jurisdictions adopt modifications to the IRC increasing the allowed riser height and the decreasing the tread depth. Mikes Roys, some of whose studies are cited by the appellant has actually recommended a minimum tread depth of 250mm or $9^{13}/_{16}$ inches for "private stairs" as home stairways are called in the UK.

For this and many other reasons we support the committee action, the final action, and the consensus process used to fairly evaluate and decide the issue.

Sincerely,

David W. Cooper, SMA Code Development Representative

Stairbuilders and Manufacturers Association

Cell: 508-496-8846

Email : coderep@stairways.org

Website: www.stairways.org

