

August 11, 2020

Mr Michael Pfeiffer
Technical Services ICC
and
Dr. Jake Pauls
Jake Pauls Consulting Services

Dear Sirs,

Regarding: ICC Appeal RB116-19

I have prepared this brief letter in regard to Appeal RB116-19. Unfortunately I am not available to participate in the Appeal Hearing on August 26, 2020. If possible this letter could be presented or read during the Hearing.

Although I am from Canada I am aware and interested in activities of the ICC and in particular this subject matter. I have provided building code consulting services on projects in Canada and many other countries around the world since 1978. I have been involved and served on National Building Code of Canada and National Fire Code of Canada Committees continuously for 38 years. I have also testified in litigation including issues related to personal injuries on stairs.

For at least the past 20 years there have been many National Building Code Task Groups of various subject matters including stair safety. In particular, most recently, in preparation for the 2015 National Building Code of Canada, I co-chaired the Task Group on Stairs, Ramps, Guards and Handrails.

A very important matter of this Task Group was stair dimensions. At that time, the minimum stair run in the NBC on a public stair was 11" and on a private star was 9.25".

This Task Group reviewed many reports and studies including some of the documents referenced in this Appeal. The initial conclusion of the Task Group was that stairs in all environments, including private and public, should have a minimum rise of 7" and a minimum run of 11", as was required at the time for public stairs.

However, based on cost studies, prepared by others and presented to the Task Group, the final recommendation of the Task Group was a comprise to increase the minimum tread run in private stairs from 9.25" to 10".

In conclusion, there was no disagreement on what the requirement for stair tread configuration should, 7-11, for all stairs, it simply comes down to the quality and accuracy of an impact analysis.

Sincerely,

Jonathan Rubes P.Eng.