



July 30, 2020

Mike Pfeiffer, P.E.
Senior Vice President of Technical Services
International Code Council

**PMI 2020
Board of
Directors**

RE: Formal Appeal of RB 81-19

Dear Mr. Pfeiffer:

Joel Smith
Kohler Co.
President

Plumbing Manufacturers International (PMI) appreciates this opportunity to provide comments regarding Mr. Pauls' formal appeal of RB 81-19, that if approved, would mandate the installation of grab bars in all residential bathtubs and showers.

Todd Teter
Moen Incorporated
Vice President

Martin Knieps
Viega LLC
Secretary-Treasurer

Nate Kogler
Bradley Corporation
Immediate Past
President

Sal Gattone
LIXIL

PMI is an international, U.S.-based trade association representing manufacturers that provide 90% of the plumbing products sold in the United States. PMI members manufacture toilets, faucets, showerheads, bathtubs, showers, grab bars and other plumbing products, across the country for the residential and commercial marketplace. These products are readily available at home improvement stores, hardware stores and showrooms in all 50 states, as well as online.

Regarding RB 81-19, PMI **supports** the actions taken by the International Residential Code Committee-Building and ICC membership in rejecting this proposal and would like to bring to your attention the following comments for your consideration:

Daniel Gleiberman
Sloan Valve
Company

Fernando Fernandez
Toto USA

Robert Neff
Delta Faucet Co.

- As a member of ICC's Industry Advisory Committee that advises the ICC Board on matters of code and standards development, and as a long time participant in the ICC code development process, PMI believes Mr. Pauls was provided ample opportunity to present RB 81-19 during the 2018/19 ICC Code Development Cycle in accordance with ICC policy.
- Most manufactured bathtubs, bathtub/shower combinations and showers that are installed in residential occupancies are not designed for grab bar installations, nor can such fixtures be redesigned for the installation of grab bars due to several factors including wall surface geometry where the gap between the wall of the fixture and wall framing varies or because of the location of built-in features such as shelving, soap dishes, etc. Therefore, RB 81-19 as proposed would eliminate most bathtubs, bathtub/shower combinations and showers in the marketplace which will drastically reduce consumer choice.
- Stanchions are generally installed using fasteners. Mr. Pauls has recommended in the past the use of automotive-grade adhesive that is designed for automotive applications, and not for building construction applications, for the installation of stanchions into the rim of bathtubs. To PMI's knowledge, **there is not a bathtub in the marketplace that is designed for the installation of a stanchion into its rim, whether installing with fasteners or adhesive, without voiding the manufacturer's warranty despite the claim made by Mr. Pauls on page 7 of his formal appeal.**

Thank you for considering our comments. If you have any questions regarding our comments, please do not hesitate to contact me.

Sincerely,



Matt Sigler
Technical Director
Plumbing Manufacturers International
Office 847-217-7212
msigler@safeplumbing.org

PMI Members

*Bradley Corporation *CSA Group *Delta Faucet Company *Duravit USA
*Fisher Manufacturing Company *Fluidmaster, Inc. *Franke *Global OEM *Globe Union Group, Inc. *Hansgrohe, Inc.
*Haws Corporation *IAPMO *International Code Council Evaluation Service *KEROX *Kohler Co *Lavelle Industries, Inc. *LIXIL *Moen Incorporated
*NEOPERL, Inc. *NSF International *Pfister *Reliance Worldwide Corporation *Similor AG *Sloan Valve Company *Speakman Company *Sprite
*Symmons Industries, Inc. *T & S Brass and Bronze Works, Inc. *TOTO USA *UL LLC *Viega LLC *WaterPik *WCM Industries, Inc