



ICC A117.1 STANDARD
PUBLIC COMMENT REPORT
Comments on the
THIRD PUBLIC REVIEW DRAFT

October 1, 2015

ICC/ANSI A117.1 STANDARD
DEVELOPMENT - 2015 EDITION

A117.1 Standard Committee
2012 Cycle Changes to review for
2015 Edition of the A117.1 Standard
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ICC A117.1 Standard – Accessible and Usable Buildings and Facilities Third Public Review Draft Public Comment Report – October 1, 2015

First Public Review Draft:

In October of 2013, the First Public Review Draft (1st PRD) of the ICC A117.1 Standard was published and available for public comment. Approximately 200 public comments were received. During 2014, the A117.1 Committee considered these public comments and took action on each. Of those actions, 61 resulted in changes to the 1st PRD of the A117.1 standard. Those 61 changes were assembled and published as the Second Public Review Draft.

The proponents of the 200 public comments were asked if they considered the issues raised by their public comment to be resolved. If not, they could have requested further consideration by the committee. Outside of the public comments received on the Second Public Review Draft, no comment proponent provided communication that their issue was unresolved. Therefore there was no unresolved issues report at this stage of the process.

Second Public Review Draft:

The Second Public Review Draft (2nd PRD) of the ICC A117.1 Standard – 2015 edition was published on November 7, 2014. The public was afforded through December 22, 2014 the opportunity to submit comments on the changes contained in the 2nd PRD.

Fifty-three distinct public comments addressing 37 of the changes in the 2nd PRD were received addressing the substantive changes contained in the 2nd PRD. In February of 2015, the A117.1 Committee considered these public comments and took action on each. Of those actions, 26 resulted in changes to the 2nd PRD. Those 26 changes were assembled and published as the Third Public Review Draft.

Third Public Review Draft:

The Third Public Review Draft (3rd PRD) of the ICC A117.1 Standard – 2015 edition was published on July 2, 2015. The public was afforded through August 17, 2015 the opportunity to submit comments on the changes contained in the 3rd PRD.

Fifteen distinct public comments addressing 9 of the changes in the 3rd PRD were received addressing the substantive changes contained in the 3rd PRD. Those 15 comments are found in this report. Each comment is considered as a separate agenda item. The agenda item numbers are a subnumber to the agenda item number from the February 2015 meeting. They are also numbered according to the original comment number system for the purposes of keeping a consistent record of the proposals and the subsequent actions affecting each.

No substantive public comments were received on 17 changes published in the 3rd PRD. These 17 changes are now complete and will be reflected in the next edition of the standard. They are not subject to further public review. In addition to the 15 comments on the agenda, comments were received which suggested amendments to provisions of the standard which are not currently open to comment. Such comments are outside the scope of the current review. Finally a few comments were purely editorial in nature and will be addressed as such.

The proponents of the 53 public comments to the Second Public Review Draft were asked if they considered the issues raised by their public comment to be resolved by the Committee's action in February 2015. If not, they could have requested further consideration by the committee. One such request was received regarding an issue which the committee did not approve. A separate report – Unresolved Issue Report – October 1, 2015 will be issued concurrently with this report.

This report provides each public comment in the following format:

Number of change as published in Third Public Review Draft	
Agenda Item Number	
Tracking number	Name of person submitting comment
	Organization, if any, represented
	The specific comment made
Reason supplied by the commenter for their comment	
Number of change as published in Third Public Review Draft	
Proponent of Original Change	
The text of the change published in the Third Public Review draft	

The A117.1 Committee will review and take action on the 15 comments and the unresolved issue. If any of the actions result in further amendment to the standard, those changes will be published as a Fourth Public Review Draft.

Companion Documents:

1. Unresolved Issue Report – October 1, 2015
2. Public Comment Report Historic Background – October 1, 2015
3. Third Public Review Draft – supplement – July 2, 2015 (This document reflects all approved changes through July 2015 but does not include comments on the Third Public Review Draft)

If you have questions, please direct them to Kermit Robinson, krobinson@iccsafe.org

3-5-12	
Agenda Item #1.1	
Comment No: 3-5-12/1.1 – PC 1.1	Submitted by: Doug Anderson American Hotel and Lodging Association
	<p>Further revise as follows:</p> <p>304.2 Floor Surface. Floor surfaces of a turning space shall comply with Section 302. Changes in level <u>exceeding that permitted by Section 303.2</u> are not permitted within the turning space.</p> <p style="text-align: center;">EXCEPTION: Slopes not steeper than 1:48 shall be permitted.</p> <p>305.2 Floor Surfaces. Floor surfaces of a clear floor space shall comply with Section 302. Changes in level <u>exceeding that permitted by Section 303.2</u> are not permitted within the clear floor space.</p> <p style="text-align: center;">EXCEPTION: Slopes not steeper than 1:48 shall be permitted.</p> <p>404.2.3.1 Floor Surface. Floor surface within the maneuvering clearances shall have a slope not steeper than 1:48 and shall comply with Section 302. <u>Changes in level exceeding that permitted by Section 303.2 are not permitted within the maneuvering clearances.</u></p> <p>405.7.1 Slope. Landings shall have a slope not steeper than 1:48 and shall comply with Section 302. <u>Changes in level exceeding that permitted by Section 303.2 are not permitted within the landings.</u></p> <p>502.5 Floor Surfaces. Parking spaces and access aisles shall comply with Section 302 and have surface slopes not steeper than 1:48. Access aisles shall be at the same level as the parking spaces they serve. <u>Changes in level exceeding that permitted by Section 303.2 are not permitted within the parking spaces and access aisles.</u></p> <p>503.4 Floor Surfaces. Vehicle pull-up spaces and access aisles serving them shall comply with Section 302 and shall have slopes not steeper than 1:48. Access aisles shall be at the same level as the vehicle pull-up space they serve. <u>Changes in level exceeding that permitted by Section 303.2 are not permitted within the vehicle pull-up spaces and access aisles.</u></p> <p>802.2 Floor Surfaces. The floor surface of wheelchair space locations shall have a slope not steeper than 1:48 and shall comply with Section 302. <u>Changes in level exceeding that permitted by Section 303.2 are not permitted within the floor surface of wheelchair space locations.</u></p>
<p>Reason: Allowing a change in level up to 0.25" provides a reasonable maximum change in level for transitions between flooring or pavement materials.</p> <p>In addition – regarding Section 503.4: The pull up space and the access aisle are usually two different types of pavement. Most often there is an asphalt pull up space with a concrete access aisle. Installing a transition from asphalt to concrete that is perfectly flush for a 20'-25' length of the pull up space is not very feasible.</p>	

3-5-12 As Published in 3rd Public Review Draft

Proponent of Original Change proposal: A117.1/ADA Harmonization Task Group

304.2 Floor Surface. Floor surfaces of a turning space shall have a slope not steeper than 1:48 and shall comply with Section 302. Changes in level exceeding that permitted by Section 303.3 are not permitted within the turning space.

EXCEPTION: Slopes not steeper than 1:48 shall be permitted.

305.2 Floor Surfaces. Floor surfaces of a clear floor space shall have a slope not steeper than 1:48 and shall comply with Section 302. Changes in level exceeding that permitted by Section 303.3 are not permitted within the clear floor space.

EXCEPTION: Slopes not steeper than 1:48 shall be permitted.

404.2.3.1 Floor Surface. Floor surface within the maneuvering clearances shall have a slope not steeper than 1:48 and shall comply with Section 302. Changes in level exceeding that permitted by Section 303.3 are not permitted within the maneuvering clearances.

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5-24-12	
Agenda Item #7.1	
Comment No: 5-24-12/1.1 – PC 1.1	Submitted by: Robert Feibleman Nevada HAND
	<p>Further revise as follows:</p> <p>Exception: Emergency aid devices, such as fire department hose connections, hose cabinets, valve controls, gauges, police call boxes, <u>key lock boxes</u>, and annunciator panels shall not be required to comply with Section 309 provided that they are used only for emergencies by their intended use is solely by emergency personnel acting in their official capacity, <u>or service providers maintaining such devices.</u></p>
<p>Reason: Two-way communication devices are required by the International Building Code and those used solely by emergency responders, are used by responders include more than police, thus the removal of the word 'police' from call boxes. These devices, are part of systems that are maintained by others, thus touched by responders and system installers and servicing company personnel. My original intent for this revision was to also include fire extinguishers. It would appear the committee felt that those should meet the standard. What about a fire hose, in a cabinet, that requires the turning of a valve?</p>	

5-24-12 As Published in 3rd Public Review Draft
Proponent of Original Change proposal: Robert Feibleman
<p>309.1 General. Operable parts required to be accessible shall comply with Section 309.</p> <p>Exception: Firefighting <u>Emergency Aid</u> devices, such as <u>fire department</u> hose connections, valve controls, gauges, <u>police call boxes</u> and annunciator panels shall not be required to comply with Section 309 provided that they are used only for emergencies by emergency personnel acting in their official capacity.</p>

4-34-12	
Agenda Item #13.1	
Comment No: 4-34-12/1.1 – PC 1.1	Submitted by: Gigi Scovel Paralyzed Veterans of America
	<p>Further revise as follows:</p> <p>404.3.4 Two Doors or Gates in Series. Doors or gates in series shall comply with Section 404.2.5.</p> <p>EXCEPTION: Where both doors or gates in series are power assist doors, low energy automatic doors or full power automatic doors, the two doors and gates in a series shall not be required to provide a turning space between the doors.</p> <p>Amendment proposed</p> <p>EXCEPTION: Where both doors or gates in series are power assist doors, low energy automatic doors or full power automatic doors, the two doors and gates in a series shall not be required to provide a turning space between the doors.</p> <p>Failed</p> <p>Second amendment proposed:</p> <p>EXCEPTION: Where both doors or gates in series are power assist doors, low energy automatic doors or full power automatic doors, the two doors and gates in a series shall not be required to provide a turning space between the doors.</p>
<p>Reason: This is a reduction in accessibility and a potential life safety issue. If one of the doors in the series malfunctions, if the power is out, or if the doors are not maintained, a person may not be able to turn around to exit the doorway, use the doors, or could potentially become stuck.</p>	

4-34-12 As Published in 3rd Public Review Draft
Proponent of Original Change proposal: Kim Paarlberg, International Code Council
<p>404.3.4 Two Doors or Gates in Series. Doors or gates in series shall comply with Section 404.2.5.</p> <p><u>EXCEPTION: Where both doors or gates in series are power assist doors, low energy automatic doors or full power automatic doors, the two doors and gates in a series shall not be required to provide a turning space between the doors.</u></p>

6-20-12																									
Agenda Item #24A.1																									
Comment No: 6-20-12/2.1 – PC 2.1	Submitted by: Gene Boecker National Association of Theatre Owners																								
	<p>Further revise as follows:</p> <p style="text-align: center;">Table 604.9.3.1 – Door Opening Locations</p> <table border="1"> <thead> <tr> <th>Door Opening Location</th> <th>Measured From</th> <th>Dimension</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Front Wall or Partition</td> <td>From the side wall or partition closest to the water closet</td> <td>56 inches (1420 mm) minimum</td> </tr> <tr> <td colspan="2" style="text-align: center;">Or</td> </tr> <tr> <td>From the side wall or partition farthest from the water closet</td> <td>4-<u>5</u> inches (100-125 mm) maximum</td> </tr> <tr> <td rowspan="3">Side Wall or Partition - Wall-Hung Water Closet</td> <td>From the rear wall</td> <td>52 inches (1320 mm) minimum</td> </tr> <tr> <td colspan="2" style="text-align: center;">Or</td> </tr> <tr> <td>From the front wall or partition</td> <td>4-<u>5</u> inches (100-125 mm) maximum</td> </tr> <tr> <td rowspan="3">Side Wall or Partition - Floor-Mounted Water Closet</td> <td>From the rear wall</td> <td>55 inches (1395 mm) minimum</td> </tr> <tr> <td colspan="2" style="text-align: center;">Or</td> </tr> <tr> <td>From the front wall or partition</td> <td>4-<u>5</u> inches (100-125 mm) maximum</td> </tr> </tbody> </table>	Door Opening Location	Measured From	Dimension	Front Wall or Partition	From the side wall or partition closest to the water closet	56 inches (1420 mm) minimum	Or		From the side wall or partition farthest from the water closet	4- <u>5</u> inches (100-125 mm) maximum	Side Wall or Partition - Wall-Hung Water Closet	From the rear wall	52 inches (1320 mm) minimum	Or		From the front wall or partition	4- <u>5</u> inches (100-125 mm) maximum	Side Wall or Partition - Floor-Mounted Water Closet	From the rear wall	55 inches (1395 mm) minimum	Or		From the front wall or partition	4- <u>5</u> inches (100-125 mm) maximum
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<p>Reason: While the added “OR” is appropriate, the original intent with the proposal was to address a condition where the pilaster could have two support bolts rather than one. That’s the 5 inches rationale. The committee originally agreed that this made sense. I do not recall this being a part of the discussion during the last series of public comments – only the “OR” was discussed. The 5-inch dimension should be reinserted with the “OR” so that the original intent, as previously approved by the committee, can be incorporated. The figure will need to be changed to represent the two conditions; possibly two figures showing each option.</p>																									

6-20-12 As Published in 3rd Public Review Draft

Proponent of Original Change proposal: Alan Gettleman, Bobrick Washroom Equipment, Inc

Table 604.9.3.1 – Door Opening Locations

Door Opening Location	Measured From	Dimension
Front Wall or Partition	From the side wall or partition closest to the water closet	56 inches (1420 mm) minimum
	<u>Or</u>	
	From the side wall or partition farthest from the water closet	45 inches (1143 mm) maximum
Side Wall or Partition - Wall-Hung Water Closet	From the rear wall	52 inches (1320 mm) minimum
	<u>Or</u>	
	From the front wall or partition	45 inches (1143 mm) maximum
Side Wall or Partition - Floor-Mounted Water Closet	From the rear wall	55 inches (1395 mm) minimum
	<u>Or</u>	
	From the front wall or partition	45 inches (1143 mm) maximum

6-46-12	
Agenda Item #25.1	
Comment No: 6-46-12/2.1 – PC2.1	Submitted by: Kim Paarlberg International Code Council
	<p>Further revise as follows:</p> <p>608.2.1.2 Clearance. A clearance of 52 inches (1320 mm) minimum in length <u>measured perpendicular between 12 inches (305 mm) and 16 inches (? mm) beyond the seat wall</u>, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment. <u>The seat wall shall align with the wheelchair seat back as per Section 305.8 Seat Back Location, or be 4 inches (100 mm) maximum behind the seat wall.</u></p> <p>305.8 Seat Back Location. For the purposes of this standard, the seat back of a wheelchair within the clear floor space shall be considered 40 inches (1015 mm) from the front or 12 inches (305 mm) from the rear of the wheelchair space.</p>
<p>Reason: There is no reason to send someone to a separate building block section for seat back alignment. We do not do this for shoulder alignment in Chapter 8, but instead provide a specific measurement for the clear floor space in the section dealing with alignment. Putting the requirement into the transfer shower section would be consistent.</p> <p>This is not intended to be a technical change. It will allow the same alternatives provided for in the current text approved by the committee. This would address the concern that the increased clear floor space of 52", with leaving the dimension at 12", would force a wall offset. The range of alignment would allow for flexibility in design and is within the range that Dr. Steinfeld said was adequate for alignment for transfer. There will not be walls on both sides, because this location still has to meet the alcove provisions that require 60" for sideways movement. See the attached drawing for an example of the configuration options.</p>	

6-46-12 As Published in 3rd Public Review Draft
Proponent of Original Change proposal: Ed Steinfeld, IDEA Center, School of Architecture and Planning, University at Buffalo, State University of New York.
<p>608.2.1.2 Clearance. A clearance of 52 inches (1320 mm) minimum in length measured perpendicular from 12 inches (305 mm) beyond the seat wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment. <u>The seat wall shall align with the wheelchair seat back as per Section 305.8 Seat Back Location, or be 4 inches (100 mm) maximum behind the seat wall.</u></p> <p>305.8 Seat Back Location. <u>For the purposes of this standard, the seat back of a wheelchair within the clear floor space shall be considered 40 inches (1015 mm) from the front or 12 inches (305 mm) from the rear of the wheelchair space.</u></p>

6-55-12	
Agenda Item #28.1	
Comment No: 6-55-12/3.1 – PC 3.1	Submitted by: Dan Bartz Kohler Company
	Further revise exception to Sec 608.3.2.1 as follows: Exception: If a permanent fixed seat is provided, the grab bar shall terminate at the leading edge of the seat.
Reason: The Standards already have language in place to address back wall grab bars and the 6” termination. However, if the committee feels it is necessary to reword this section, then we agree with this proposal, but we believe there needs to be an editorial change for the description of the seat. For consistency with the body of language within the standard the word “permanent” in the Exception statement should be changed to “fixed” the proposal should read as shown above.	

6-55-12	
Agenda Item #28.2	
Comment No: 6-55-12/3.1 – PC 3.2	Submitted by: Kim Paarlberg International Code Council
	Further revise as follows: 608.3.2.1 Back wall grab bar. In standard roll-in type showers, a grab bar shall be provided on the back wall beginning at the edge of the seat. The grab bars shall not be provided above the seat. The back wall grab bar shall extend the length of the wall and extend within 6 inches (150 mm) maximum from the adjacent side wall opposite the seat. Exceptions: 1. The back wall grab bar but shall not be required to exceed 48 inches (1220 mm) in length. 2. The back wall grab bar is not required to extend within 6 inches (150 mm) of the adjacent side wall opposite the seat if it would require the grab bar length to exceed 48 inches (1220 mm) in length. 608.3.2.1. Back Wall Grab Bar. In standard roll-in shower stalls, a grab bar shall be provided along the entire length of the back wall from 6 inches (150 mm) maximum of one corner to within 6 inches (150 mm) maximum of the opposite corner. Exception: If a permanent seat is provided, the grab bar shall terminate at the leading edge of the seat.
Reason: This proposal is to restore the language from the 2009 A117.1 for the rear grab bar in a roll-in shower. The 2009 language addressed the concern of what to do with a roll in shower that is provided in a space larger than the minimum size. Issues with the approved language are as follows:	

The language currently approved would require grab bars the full length of the rear wall, even if the roll-in shower location is part of a larger group shower room. With the 48" length requirement in the 2009 A117.1, the shower stall would have to be at least 76 inches (22" + 48" + 6" = 76") with an L-shaped seat and 69 inches (15" + 48" + 6" = 69) with a rectangular seat before this exception could be used.

The opposite wall grab bar and new vertical grab bar are not required when the shower stall is greater than 72" deep (Section 608.3.2.2 & 608.3.2.3 shown below), so what is the logic of making the rear grab bar go on forever?

There is also the point where additional supports for the extra long rear grab bar would be required. How would you do that and not block access to the grab bar? That is not addressed in the new language.

In addition, the 2009 ICC A117.1 added a requirement for a folding or fixed seat in a roll-in shower (Section 608.2.2.3 shown below). Therefore, the grab bar should always stop at the seat. An exception in the current language that says "if...provided" could be read to say a seat is not required.

The 2009 ICC A117.1 language allowed more freedom in design. One example is the new style of bathroom being used in nursing homes and hospitals that allows for assistance in bathing when needed. See diagram attached.

Seat requirements for roll-in showers are as follows:

608.2.2.3 Seat. A folding seat complying with Section 610 shall be provided on an end wall.

EXCEPTIONS:

1. A seat is not required to be installed in a shower for a single occupant accessed only through a private office and not for common use or public use, provided reinforcement has been installed in walls and located so as to permit the installation of a shower seat.
2. A fixed seat shall be permitted where the seat does not overlap the minimum clear inside dimension required by Section 608.2.2.1.

The grab bar requirements for roll-in showers as currently approved are as follows:

608.3.2 Standard Roll-in-Type Showers. Grab bars in standard roll-in showers shall comply with Sections 608.3.2.1 through 608.3.2.3. (6-55-12 PC1)

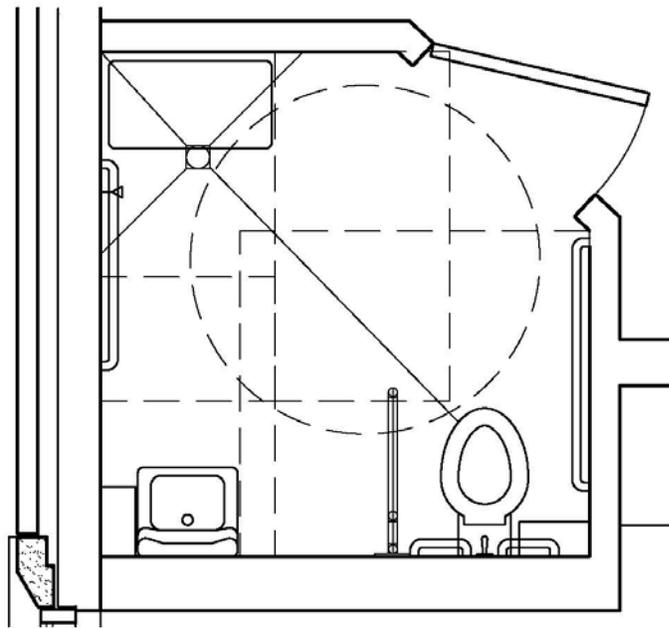
608.3.2.1 Back Wall Grab Bar. In standard roll-in type showers, a grab bar shall be provided along the entire length of the from 6 inches (150 mm) maximum of one corner to within 6 inches (150 mm) maximum of the opposite corner. (6-55-12 PC3.1) (6-61-12)

Exception: If a permanent seat is provided, the grab bar shall terminate at the leading edge of the seat. (6-55-12PC3.1)

608.3.2.2 Side wall grab bars. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, a grab bar shall be provided on the side wall opposite the seat. The side wall grab bar shall extend the length of the wall and extend within 6 inches (150 mm) maximum from the adjacent back wall. (6-55-12 PC1)

Exception: The side wall grab bar shall not be required to exceed 30 inches (760 mm) in length. (6-55-12 PC1)

608.3.2.3 Vertical Grab Bar. Where a side wall is provided opposite the seat within 72 inches (1830) of the seat wall a vertical grab bar shall be provided. A vertical grab bar 18 inches (45 mm) minimum in length shall be provided on the end wall 3 inches (75 mm) minimum and 6 inches (150 mm) maximum above the horizontal grab bar, and 4 inches (100 mm) maximum inward from the front edge of the shower. (6-61-12 PC1.2)



6-55-12 As Published in 3rd Public Review Draft

Proponent of Original Change proposal: Kim Paarlberg, International Code Council

~~**608.3.2.1 Back wall grab bar.** In standard roll-in type showers, a grab bar shall be provided on the back wall beginning at the edge of the seat. The grab bars shall not be provided above the seat. The back wall grab bar shall extend the length of the wall and extend within 6 inches (150 mm) maximum from the adjacent side wall opposite the seat.~~

Exceptions:

- ~~1. The back wall grab bar but shall not be required to exceed 48 inches (1220 mm) in length.~~
- ~~2. The back wall grab bar is not required to extend within 6 inches (150 mm) of the adjacent side wall opposite the seat if it would require the grab bar length to exceed 48 inches (1220 mm) in length.~~

608.3.2.1. Back Wall Grab Bar. In standard roll-in shower stalls, a grab bar shall be provided along the entire length of the back wall from 6 inches (150 mm) maximum of one corner to within 6 inches (150 mm) maximum of the opposite corner.

Exception: If a permanent seat is provided, the grab bar shall terminate at the leading edge of the seat.

6-61-12	
Agenda Item #30.1	
Comment No: 6-61-12/1.2 – PC2.1	Submitted by: Hope Reed New Mexico Governor’s Commission on Disability
	<p>Further revise as follows:</p> <p>608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall not be located above the seat. Controls and hand showers shall be located in accordance with the following:</p> <ol style="list-style-type: none"> 1. On the back wall, 2. At a height of 38 inches minimum and 48 inches (1220 mm) maximum above the shower floor, and 3. 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the wall behind the seat. 4. <u>Where a shower spray unit is located on the end wall, opposite the seat, the diverter shall be located within the controls area by the seat.</u>
<p>Reason: When a roll-in shower has two shower heads a person with disabilities must be able to select the shower head they prefer. A shower diverter can be a push button, or twist knob, located directly on the spray unit. This added text would require the diverter to be usable and within reach for a person who sits while showering.</p>	

6-61-12	
Agenda Item #30.2	
Comment No: 6-61-12/1.2 – PC2.2	Submitted by: Vincent Barrera New Mexico Governor’s Commission on Disability
	<p>Further revise as follows:</p> <p>608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall not be located above the seat. Controls and hand showers shall be located in accordance with the following:</p> <ol style="list-style-type: none"> 1. On the back wall, 2. At a height of 38 inches minimum and 48 inches (1220 mm) maximum above the shower floor, and 3. 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the wall behind the seat. 4. <u>Where a shower spray unit diverter is provided, it shall be located within the controls area by the seat.</u>
<p>Reason: When a roll-in shower has two shower heads a person with disabilities shall be able to select the shower head they</p>	

prefer for standing or sitting or use both via diverter within reach of the controls.

6-61-12	
Agenda Item #30.3	
Comment No: 6-61-12/1.2 – PC2.3	Submitted by: Dan Bartz Kohler Company
	Further revise as follows: 608.3.2.2 Vertical Grab Bar. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, a vertical grab bar shall be provided. A vertical grab bar 18 inches (45 mm) minimum in length shall be provided on the ambulatory control side wall 3 inches (75 mm) minimum and 6 inches (150 mm) maximum above the horizontal grab bar, and 4 inches (100 mm) maximum inward from the front edge of the shower.
Reason: We recommend that the proposed language for the requirement of a vertical grab bar be removed or withdrawn. We fail to see what purpose a vertical grab bar will serve, since in the above proposed language, the shower control and the hand held spray has been stricken and the same language has been struck from the 6-61-12 PC 1.4 proposal. Based on these changes a vertical grab bar on the wall opposite the seat wall within a roll-in shower seems totally inappropriate.	

6-61-12, in part, As Published in 3rd Public Review Draft

Proponent of Original Change proposal: Hope Reed, New Mexico Governor's Commission on Disability

~~**608.3.2.2 608.3.2.1.1 Vertical Grab Bar.** Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, ~~Where an ambulatory roll-in shower control and hand spray are provided,~~ a vertical grab bar shall be provided. A vertical grab bar 18 inches (45 mm) minimum in length shall be provided on the ambulatory control side wall 3 inches (75 mm) minimum and 6 inches (150 mm) maximum above the horizontal grab bar, and 4 inches (100 mm) maximum inward from the front edge of the shower.~~

608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall not be located above the seat. Controls and hand showers shall be located in accordance with the following:

1. On the back wall,
2. At a height of 38 inches minimum and 48 inches (1220 mm) maximum above the shower floor, and
3. 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the wall behind the seat.

7-1-12	
Agenda Item #35.1	
Comment No: 7-1-12/3.1 – PC1.1	Submitted by: Kim Paarlberg International Code Council
	<p>Further revise as follows:</p> <p>705 Detectable Warnings</p> <p>705.3 Contrast. Detectable warning surfaces shall contrast visually with adjacent surfaces. The Light Reflectance Value (LRV) of the surfaces shall contrast 70 percent minimum, as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45 either light-on-dark or dark-on-light.</p>
<p>Reason: The committee decided in 7-1-2 PC3 to take the visual contrast requirements off of stairways. There is even more of a concern with detectable warnings on curb cuts. What happens when there is snow, mud or rain? The language should be restored to the 2009 ICC A117.1 requirements.</p>	

7-1-12	
Agenda Item #35.2	
Comment No: 7-1-12/3.1 – PC1.1	Submitted by: Kim Paarlberg International Code Council
	<p>Add new definitions as follows:</p> <p>106 Definitions</p> <p><u>ordinary materials: a material which is not retroreflecting, fluorescent, phosphorescent, involves electrical power for light emission or is self-luminous</u></p> <p><u>multi-colored surfaces: surfaces formed by distinct areas of different color, which when viewed from a maximum distance of 10 feet (3 m), remain distinct; or surfaces formed from small color specks, chips or tufts, which when viewed from a distance of 10 feet (3 m), assume the appearance of one color</u></p> <p>Further revise as follows:</p> <p>703 Signs</p> <p>703.1 General.</p> <p>703.1.1 Designations</p> <p>703.1.2 Directional and Informational Signs.</p>

703.1.3 Pictograms.

~~701.1.2~~ **703.1.4 Light Reflectance Value.** The light reflectance value (LRV) of surfaces shall be determined in accordance with BS 8493 listed in Section 106.2.3 for the following surface types:

1. Opaque paint coatings and paint systems, ~~including those~~ that cause extreme angular dependences of reflected light and ~~those~~ that have a surface texture of less than 2 mm.
2. Opaque coverings ~~including those~~ that cause extreme angular dependences of reflected light, ~~and those~~ that have an unyielding texture of less than 2 mm.
3. Opaque coverings with a yielding pile, ~~e.g. such as~~ carpet.
4. Opaque materials, ~~including those~~ that cause extreme angular dependences of reflected light, and ~~those~~ that have a texture of less than 2 mm, ~~e.g. such as~~ finished metals.
5. Opaque materials coated with non-opaque coatings or coverings, ~~e.g. timber door coated with a woodstain, including those~~ that cause extreme angular dependences of reflected light, and ~~those~~ that have a texture of less than 2 mm such as timber door coated with a woodstain.
6. Multi-colored surfaces.
7. Ordinary materials ~~that are as defined in Section 3. Terms and Definitions, subsection 3.3 in BS 8493 listed in Section 106.2.3.~~

~~701.1.2.1~~ **Other Surfaces.** Other surfaces shall comply with Section 703.1.3.1.

~~703.1.5~~ ~~701.1.3~~ **Contrast Value.** The contrast between the LRVs of adjacent surfaces required by Sections ~~703.2.1.2, 703.5.3.2, 703.6.3.2 and 705.3~~ shall be determined by Equation 7-1,

$$\text{Contrast} = [(B1-B2)/B1] \times 100 \text{ percent} \qquad \text{Equation 7-1}$$

Where

- B1 = light reflectance value (LRV) of the lighter surface,
- B2 = light reflectance value (LRV) of the darker surface.

~~703.1.6~~ ~~701.1.3.1~~ **Other Surfaces.** Surfaces not ~~within the scope of BS 8493 not listed in Section 703.1.4~~ shall provide contrast between adjacent surfaces that are either light on dark or dark on light.

703.2 Visual Characters.

703.2.1.1 Nonglare Finish. The glare from coverings, the finish of characters and their background shall not exceed 19 glare units (gu) as measured on a 60-degree gloss meter. (7-1-12)

703.2.1.2 Contrast. The Light Reflectance Value (LRV) of characters and their background shall contrast 70 percent minimum as determined in accordance with ~~Equation 7-1~~ Section 703.1.5. The lighter surface shall have a LRV of not less than 45.

703.3 Raised Characters.

703.3.12 Finish and Contrast. Characters and their background shall have a non-glare finish. Characters shall contrast with their background with either light characters on a dark background, or dark characters on a light background.

EXCEPTION: Where separate raised characters and visual characters with the same information are provided, raised characters are not required to have nonglare finish or to contrast with their background.

703.4 Braille. *(no requirement for finish and contrast)*

703.5 Pictograms.

703.5.3 Finish and Contrast. Pictograms and their fields shall comply with Sections 703.5.3.1 and 703.5.3.2

703.5.3.1 Nonglare Finish. The glare from coverings and the finish of pictograms and their fields shall not exceed 19 as measured on a 60-degree gloss meter.

703.5.3.2 Contrast. The Light Reflectance Value (LRV) of pictograms and their fields shall contrast 70 percent minimum as determined in accordance with ~~Equation 7-1~~ Section 703.1.5. The lighter surface shall have a LRV of not less than 45.

703.6 Symbols of Accessibility.

703.6.2 Finish and Contrast. Symbols of accessibility and their backgrounds shall comply with Sections 703.6.2.1 and 703.6.2.2.

703.6.2.1 Nonglare Finish. The glare from coverings and the finish of symbols of accessibility and their backgrounds shall not exceed 19 as measured on a 60-degree gloss meter.

703.6.2.2 Contrast. The Light Reflectance Value (LRV) of symbols of accessibility and their backgrounds shall contrast 70 percent minimum, as determined in accordance with ~~Equation 7-4~~ Section 703.1.5. The lighter surface shall have a LRV of not less than 45.

703.7 Variable Message Signs.

703.7.10 Finish. The background of Low resolution VMS characters shall have a non-glare finish.

703.7.11 Contrast. Low resolution VMS characters shall be light characters on a dark background.

705 Detectable Warnings

705.3 Contrast. Detectable warning surfaces shall contrast visually with adjacent surfaces. The Light Reflectance Value (LRV) of the surfaces shall contrast 70 percent minimum, as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45.

707 Automatic Teller Machines (ATMs) and Fare Machines

	<p>707.7.2 Characters Characters displayed on the screen shall be in a sans serif font. The uppercase letter “I” shall be used to determine the allowable height of all characters of the font. The uppercase letter “I” of the font shall be $\frac{3}{16}$ inch (4.8 mm) minimum in height. Characters shall contrast with their background with either light characters on a dark background, or dark characters on a light background.</p>
<p>Reason: I believe this proposal is seriously broken and should be disapproved. What is suggested is the minimum for understanding, consistency and code language.</p> <p>This section being under under the general scope for a chapter that deals with alarms, signs, telephones, detectable warnings, automatic teller machines, and two-way communication is very confusing. At the least this should be moved under general signage requirements.</p> <p>I do not understand what “that cause extreme angular dependences of reflected light” is supposed to mean to the average enforcer?</p> <p>This entire list is within the scope of the standard, so why repeat it here? Proposed is correct code language.</p> <p>Based on the list in Item 1 through 5, instead of sending someone to the standard to get the definitions of multi-color material (which this proposal did not do) and ordinary material (which the proposal did do), they should be repeated here. Given the referenced standard definition for ordinary material, this definition does not say what it is!</p> <p>While the items listed are the scope of BS 8493, they are listed here, so the reference in Section 701.1.3.1 should be to the list in ICC A117.1.</p> <p>The current section 701.1.2.1 is redundant and not needed.</p> <p>The list of section numbers where this is applied in 701.1.3 is not needed. We do not reference back and forth for a requirement. The correct reference in the sections would be to the section, not the equation number.</p> <p>If this truly is supposed to be how we look at glare and contrast, why was this not included for raised characters, variable message signage and automatic teller and fare machines? This is addressed in a separate public comment.</p> <p>Is this light reflectance value really going to work on a detectable warning on a sidewalk? What about when there is snow or dirt or rain? The committee took this out for stairways in a previous action. This is addressed in a separate public comment.</p>	

7-1-12	
Agenda Item #35.3	
<p>Comment No: 7-1-12/3.1 – PC1.1</p>	<p>Submitted by: Teresa Cox International Sign Association</p>
	<p>Delete standard as follows:</p> <p>406.2.3 Light reflectance value (LRV) of a surface. Method of Test. BS 8493:2008 + A1: 2010 (British Standards Institution, 389 Chiswick High Road, London W4 4AL, United Kingdom).</p> <p>Further revise as follows</p> <p>701.1.2 Light Reflectance Value. The light reflectance value (LRV) of surfaces shall be determined in accordance with BS 8493 for the following surface types:</p> <p>1. Opaque paint coatings and paint systems, including those that cause extreme</p>

angular dependences of reflected light and those that have a surface texture of less than 2 mm.

~~2. Opaque coverings including those that cause extreme angular dependences of reflected light, and those that have an unyielding texture of less than 2 mm.~~

~~3. Opaque coverings with a yielding pile, e.g. carpet.~~

~~4. Opaque materials, including those that cause extreme angular dependences of reflected light, and those that have a texture of less than 2 mm, e.g. finished metals.~~

~~5. Opaque materials coated with non-opaque coatings or coverings, e.g. timber door coated with a woodstain, including those that cause extreme angular dependences of reflected light, and those that have a texture of less than 2 mm.~~

~~6. Multi-colored surfaces.~~

~~7. Ordinary materials as defined in Section 3. Terms and Definitions, subsection 3.3 in BS 8493 listed in Section 106.2.3.~~

~~**701.1.2.1 Other Surfaces.** Other surfaces shall comply with Section 703.1.3.1.~~

~~**701.1.3 Contrast Value.** The contrast between the LRVs of adjacent surfaces required by Sections 703.2.1.2, 703.5.3.2, 703.6.3.2 and 705.3 shall be determined by Equation 7-1,~~

$$\text{Contrast} = [(B1 - B2) / B1] \times 100 \text{ percent} \quad \text{Equation 7-1}$$

~~Where~~

~~B1 = light reflectance value (LRV) of the lighter surface,
B2 = light reflectance value (LRV) of the darker surface.~~

~~**701.1.3.1 Other Surfaces.** Surfaces not within the scope of BS 8493 shall provide contrast between adjacent surfaces that are either light on dark or dark on light.~~

703.2 Visual Characters.

703.2.1 General. Visual characters shall comply with the following:
(Balance of section is not changed)

703.2.1.1 Nonglare Finish. The glare from coverings, the finish of characters and their background shall not exceed 19 as measured on a 60-degree gloss meter.

~~**703.2.1.2 Contrast.** The Light Reflectance Value (LRV) of characters and their background shall contrast 70 percent minimum as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45.~~

703.2.10 Contrast. Characters and their background shall have a non-glare finish. Characters shall contrast with their background, with either light characters on a dark background or dark characters on a light background.

703.5.3 Finish and Contrast. Pictograms and their fields shall comply with Sections 703.5.3.1 and 703.5.3.2 have a nonglare finish. Pictograms shall contrast with their fields, with either light pictograms on a dark field, or dark pictograms on a light field.

703.5.3.1 Nonglare Finish. The glare from coverings and the finish of pictograms and their fields shall not exceed 19 as measured on a 60-degree gloss meter.

~~**703.5.3.2 Contrast.** The Light Reflectance Value (LRV) of pictograms and their fields shall contrast 70 percent minimum as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45. Characters shall contrast with their background, with either light characters on a dark background or dark characters on a light background.~~

~~**703.6.2 Finish and Contrast.** Symbols of accessibility and their backgrounds shall comply with Sections 703.6.2.1 and 703.6.2.2 have a non-glare finish. Symbols of accessibility shall contrast with their backgrounds with either a light symbol on a dark background or a dark symbol on a light background.~~

~~**703.6.2.1 Nonglare Finish.** The glare from coverings and the finish of symbols of accessibility and their backgrounds shall not exceed 19 as measured on a 60-degree gloss meter.~~

~~**703.6.2.2 Contrast.** The Light Reflectance Value (LRV) of symbols of accessibility and their backgrounds shall contrast 70 percent minimum, as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45.~~

~~**705.3 Contrast.** Detectable warning surfaces shall contrast visually with adjacent surfaces, either light-on-dark or dark-on-light. The Light Reflectance Value (LRV) of the surfaces shall contrast 70 percent minimum, as determined in accordance with Equation 7-4-7-5. The lighter surface shall have a LRV of not less than 45.~~

~~**705.3.1 Contrast Value.** The contrast between the LRVs of adjacent surfaces required by Section 705.3 shall be determined by Equation 7-5,~~

~~Contrast = [(B1-B2)/B1] x 100 percent _____ Equation 7-5~~

~~Where~~

~~B1 = light reflectance value (LRV) of the lighter surface,~~

~~B2 = light reflectance value (LRV) of the darker surface.~~

Reason: ISA supports changes to the standard when those proposed changes are backed by empirical evidence and research. Very little research has been done on what makes signs legible and accessible.

We disagree with the committee action on this proposal for many reasons. The British Standard cited by the proponent pertains to contrast with other architectural elements (stairway striping, doors, carpets, and walls), not to contrast on signs.

Independent, empirical research is needed. ISA is working to identify potential funding sources for a scientific study to provide the Committee with a firm basis to change the standard.

7-1-12	
Agenda Item #35.4	
Comment No: 7-1-12/3.1 – PC1.1	Submitted by: Kim Paarlberg International Code Council
	Delete without substitution.
<p>Reason: I believe this proposal is seriously broken and should be disapproved.</p> <p>This section being under under the general scope for a chapter that deals with alarms, signs, telephones, detectable warnings, automatic teller machines, and two-way communication is very confusing. At the least this should be moved under general signage requirements.</p> <p>I do not understand what “that cause extreme angular dependences of reflected light” is supposed to mean to the average enforcer?</p> <p>The list in Section 701.1.2 is the scope of the standard. Just reference the standard for this. There is no need to repeat it.</p> <p>If you want to leave the scope here, based on the list in Item 1 through 5, instead of sending someone to the standard to get the definitions of multi-color material (which this proposal did not do – and it is needed for understanding) and ordinary material (which the proposal did do), the should be repeated in the ICC A117.1 for clarity. Below are the definitions in the standard. Given the referenced standard defintion for ordinary material, this defintion does not say what it is – only what it is not!</p> <p style="padding-left: 40px;"><i>3.3 ordinary materials material which is neither retroreflecting nor fluorescent nor phosphorescent nor involves electrical power for light emission nor is self-luminous</i></p> <p style="padding-left: 40px;"><i>3.4 multi-coloured surfaces surfaces formed by distinct areas of different colour, which when viewed from a maximum distance of 3 m, remain distinct or surfaces formed from small colour specks, chips or tufts, which when viewed from a distance, assume the appearance of one colour</i></p> <p>While the items listed are the scope of BS 8493, they are listed here, so the reference in Section 701.1.3.1 should be to the list in ICC A117.1.</p> <p>The current section 701.1.2.1 is redundant and not needed.</p> <p>The list of section numbers where this is applied in 701.1.3 is not needed. We do not reference back and forth for a requirement. The correct reference in the sections would be to the section, not the equation number.</p> <p>Why was this not added for the contrast on raised characters?</p> <p>If this truly is supposed to be how we look at glare and contrast on signage, why was this not included for variable message signage or displays on automatic teller and fare machines? Is the LRC for screens the same as signage?</p> <p>A public comment I submitted to provide for consistent regulation of raised characters, variable message signs as well as ATM’s and fare machines was ruled out of order because it was addressing sections not previously addressed. Without those additional provisions, the contrast provisions contained here are incomplete and inconsistent.</p>	

If this truly is supposed to be how we look at glare and contrast for other areas where we asked for light and dark (detectable warnings is covered in the proposal), why was this not included stairway stripes? Is the LRC for those areas the same as signage?

Is this light reflectance value really going to work on a detectable warning on a sidewalk? What about when there is snow or dirt or rain?

7-1-12 As Published in 3rd Public Review Draft

Proponent of Original Change proposal: Sharon Toji, Hearing Loss Association of America

106.2.3 Light reflectance value (LRV) of a surface. Method of Test. BS 8493:2008 + A1: 2010 (British Standards Institution, 389 Chiswick High Road, London W4 4AL, United Kingdom).

701.1.2 Light Reflectance Value. The light reflectance value (LRV) of surfaces shall be determined in accordance with BS 8493 for the following surface types:

1. Opaque paint coatings and paint systems, including those that cause extreme angular dependences of reflected light and those that have a surface texture of less than 2 mm.
2. Opaque coverings including those that cause extreme angular dependences of reflected light, and those that have an unyielding texture of less than 2 mm.
3. Opaque coverings with a yielding pile, e.g. carpet.
4. Opaque materials, including those that cause extreme angular dependences of reflected light, and those that have a texture of less than 2 mm, e.g. finished metals.
5. Opaque materials coated with non-opaque coatings or coverings, e.g. timber door coated with a woodstain, including those that cause extreme angular dependences of reflected light, and those that have a texture of less than 2 mm.
6. Multi-colored surfaces.
7. Ordinary materials as defined in Section 3. Terms and Definitions, subsection 3.3 in BS 8493 listed in Section 106.2.3.

701.1.2.1 Other Surfaces. Other surfaces shall comply with Section 703.1.3.1.

701.1.3 Contrast Value. The contrast between the LRVs of adjacent surfaces required by Sections 703.2.1.2, 703.5.3.2, 703.6.3.2 and 705.3 shall be determined by Equation 7-1,

Contrast = $[(B1-B2)/B1] \times 100$ percent Equation 7-1

Where

- B1 = light reflectance value (LRV) of the lighter surface,
- B2 = light reflectance value (LRV) of the darker surface.

701.1.3.1 Other Surfaces. Surfaces not within the scope of BS 8493 shall provide contrast between adjacent surfaces that are either light on dark or dark on light.

7-1-12 As Published in 3rd Public Review Draft

Proponent of Original Change proposal: Sharon Toji, Hearing Loss Association of America

703.2 Visual Characters.

703.2.1 General. Visual characters shall comply with the following:
(Balance of section is not changed)

703.2.1.1 Nonglare Finish. The glare from coverings, the finish of characters and their background shall not exceed 19 as measured on a 60-degree gloss meter.

703.2.1.2 Contrast. The Light Reflectance Value (LRV) of characters and their background shall contrast 70 percent minimum as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45.

~~**703.2.1.10 Contrast.** Characters and their background shall have a non-glare finish. Characters shall contrast with their background, with either light characters on a dark background or dark characters on a light background.~~

~~**703.5.3 Finish and Contrast.** Pictograms and their fields shall comply with Sections 703.5.3.1 and 703.5.3.2 have a nonglare finish. Pictograms shall contrast with their fields, with either light pictograms on a dark field, or dark pictograms on a light field.~~

~~**703.5.3.1 Nonglare Finish.** The glare from coverings and the finish of pictograms and their fields shall not exceed 19 as measured on a 60-degree gloss meter.~~

~~**703.5.3.2 Contrast.** The Light Reflectance Value (LRV) of pictograms and their fields shall contrast 70 percent minimum as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45. Characters shall contrast with their background, with either light characters on a dark background or dark characters on a light background.~~

~~**703.6.2 Finish and Contrast.** Symbols of accessibility and their backgrounds shall comply with Sections 703.6.2.1 and 703.6.2.2 have non-glare finish. Symbols of accessibility shall contrast with their backgrounds with either a light symbol on a dark background or a dark symbol on a light background.~~

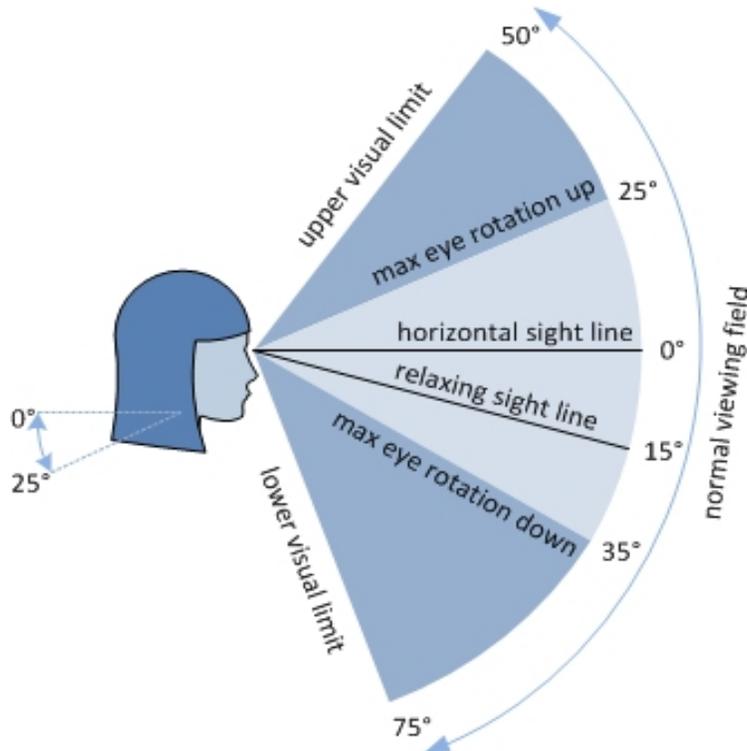
~~**703.6.2.1 Nonglare Finish.** The glare from coverings and the finish of symbols of accessibility and their backgrounds shall not exceed 19 as measured on a 60-degree gloss meter.~~

~~**703.6.2.2 Contrast.** The Light Reflectance Value (LRV) of symbols of accessibility and their backgrounds shall contrast 70 percent minimum, as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45.~~

~~**705.3 Contrast.** Detectable warning surfaces shall contrast visually with adjacent surfaces, ~~either light on dark or dark on light.~~ The Light Reflectance Value (LRV) of the surfaces shall contrast 70 percent minimum, as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45.~~

8-6-12	
Agenda Item #42.1	
Comment No: 8.6.12/1.1 – PC 1.1	Submitted by: Kim Paarlberg International Code Council
	<p>Further revise as follows:</p> <p>802.11 Stage Lighting for Sign Language Interpreters (8-6-12 PC1)</p> <p>802.11 General. (no change)</p> <p>802.11.1 Area. (no change)</p> <p>802.11.2 Location. Sign language interpreter stations shall be located so that seating within an arc from the station and measured to the left and to the right 60 degrees within 65 feet (19.8 m) horizontal distance from the station is provided with sightlines providing a view of sign language station from a height of 36 inches (915 mm) to 72 (1830 mm) inches above the floor of the station. The vertical viewing angle from the person in the seat to the interpreter station shall not exceed 30 degrees measured to the front and center of the floor and center of the floor of the sign language station.</p> <p>802.11.3 Illumination: (no change)</p> <p>802.11.4 Backdrop. When a sign language interpreter station is located <u>with a permanent wall</u> less than 10 feet (3050 mm) in front of a permanent wall behind the sign language interpreter station, <u>the permanent wall</u> and to a height of 96 inches (2440 mm) from the finish floor shall be considered as a backdrop. The backdrop shall provide a flat, smooth surface with a monochromatic, low-luster finish treatment.</p> <p>Exception: The wall is not required to comply with Section 802.11.4 where a backdrop with a monochromatic, low luster finish treatment is provided.</p>

Reason: The changes to Section 802.11.1 and 802.11.4 are for cleaner English, and perhaps can be considered editorial. The last sentence for 802.11.2 has a technical issue. The cone described for the seat from the interpreter can pick up a huge range of seats. Which seat is the vertical viewing angle required in the last sentence to be taken from? If this is interpreted as all of the seats, for the front rows, where a person with vision impairments may choose to sit, the viewing angle of 30 degrees may be too small. In a venue with tiered seating, a 65' horizontal distance from the stage may have the seats located substantially above the interpreter station. The language does not indicate if this viewing angle is up or down. I did find the attached image while attempting to do some research on this, but with the lack of technical justification and study, it seems better to not include this criteria at this time and come back with something next cycle if this becomes an issue.



8-6-12 As Published in 3rd Public Review Draft

Proponent of Original Change proposal: Hansel Bauman, National Association of the Deaf

~~106.2.14 IES Handbook 10th Edition, (Illuminating Engineering Society, 120 Wall Street, Floor 17, New York, NY 10005-4001).~~

802.11 General. Sign language interpreter stations shall comply with Section 802.11.

802.11.1 Area. A sign language interpreter station shall provide a level and clear floor of ~~sufficient floor area necessary to enable a sign language interpreter~~ with a minimum size of 24 inches (610 mm) deep and 36 inches (915 mm) wide that is located to providing a direct line of sight from ~~to produce sign language legible~~ from the seating area identified in Section 802.11.2 ~~and allow periodic interpreter shift changes to take place.~~

802.11.2 Location. Sign language interpreter stations shall be located so that seating within an arc ~~centered on~~ from the station and ~~subtending 120~~ measured to the left and right a minimum of 60 degrees ~~maximum and not~~

~~more than within 65 feet (19.8 m) horizontal distance~~ from the station is provided with sightlines providing ~~unobstructed a view of the signers from top of their heads to their waists and to an arm's length to both sides of the signer~~ sign language station from a height 36 inches (915 mm) to 72 inches (1830 mm) above the floor of the station, ~~all as measured to the center of the station.~~ The vertical viewing angle from the person in the seat to the interpreter station shall not exceed 30 degrees ~~measures to the front and center of the floor of the sign language station.~~

802.11.3 Illumination: The sign language interpreter station shall have lighting facilities capable of providing 10 foot-candles (108 lux) of illuminance while signing is underway ~~be illuminated in compliance with 802.11.2~~ measured at the center of the floor of the sign language station at a height of 48 inches (1220 mm) above the floor. ~~Illumination of the sign language interpreter station shall comply with the Recommended Maintained Illuminance Targets established for a "Transitional Sermon" by IES Handbook 10th Edition, Table 37.2.~~

802.11.4 Backdrop. When a sign language interpreter station is located ~~no greater~~ less than 10 feet (3050 mm) in front of a permanent wall ~~as measured tangent to the centerline of the arc described in Section 802.11.2~~ a portion of the wall measuring 69 inches (1755 mm) wide ~~centered on~~ behind the sign language interpreter station and to a height of 96 inches (2440 mm) high from the finish floor shall be considered as a backdrop. ~~The surface treatment of the backdrop shall comply with Section 802.11.5 while sign language interpretation is being provided.~~ The backdrop shall provide a flat, smooth surface with a monochromatic, low-luster finish treatment.

Exception: The wall is not required to comply with Section 802.11.4 where a backdrop with a monochromatic, low-luster finish treatment is provided.