



**PUBLIC COMMENT REPORT
ADDENDUM**

**PUBLIC COMMENTS RECEIVED ON
FIRST PUBLIC REVIEW DRAFT**

Corrections

January 14, 2014

**ICC/ANSI A117.1 STANDARD
DEVELOPMENT - 2014 EDITION**

**The comments contained in this report will be
Considered by the A117.1 Committee.**

January 21 – 24, 2014.

U.S. Access Board Conference Room

Washington, DC.

ICC A117.1 Standard – Accessible and Usable Buildings and Facilities

Public Comment Report – Comments received on First Public Review Draft

December 23, 2013- Addendum January 14, 2014

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.

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

Additional public comment to 3-13L-12 received by the deadline, but incorrectly left out of original report.

3-13L-12 PC9

Ron Nickson, – representing National Multi Housing Council

Further revise as follows – Please note this is Section 1004 in the current standard. The numbering below reflects committee action to exchange Chapters 10 and 11.

1104 Type B Units

1104.1 General. Type B units shall comply with Section 1104.

1104.1.1. Clear Floor Space. The clear floor space shall be 48 inches (1220 mm) minimum in length and 30 inches (760 mm) minimum in width.

1004.1.2 Alcoves. Where the clear floor space is positioned for a forward approach, the alcove shall be 36 inches (915 mm) minimum in width where the depth exceeds 24 inches (610 mm).

1004.1.3 Forward reach unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the floor.

1104.1.4. Mailboxes. Mailboxes serving Type B dwelling units and complying with Section 1101.2 shall be permitted an unobstructed side reach range at 54 inches (1370 mm) maximum above the floor.

1104.1.5. Parking Space Width. Access aisles serving Type B units and adjacent to accessible and van accessible parking spaces shall be 60 inches (1525 mm) minimum in width.

1104.2 Primary Entrance. The accessible primary entrance shall be on an accessible route from public and common areas. The primary entrance shall not be to a bedroom unless it is the only entrance.

1104.3 Accessible Route. Accessible routes within Type B units shall comply with Section 1104.3.

1104.3.1 Location. At least one accessible route shall connect all spaces and elements that are a part of the unit. Accessible routes shall coincide with or be located in the same area as a general circulation path.

EXCEPTIONS:

1. An accessible route is not required to unfinished attics and unfinished basements that are part of the unit.
2. One of the following is not required to be on an accessible route:
 - 2.1 A raised floor area in a portion of a living, dining, or sleeping room; or
 - 2.2 A sunken floor area in a portion of a living, dining, or sleeping room; or
 - 2.3 A mezzanine that does not have plumbing fixtures or an enclosed habitable space.

1104.3.2 Components. Accessible routes shall consist of one or more of the following elements: walking surfaces with a slope not steeper than 1:20, doors and doorways, ramps, elevators, and platform lifts.

~~1104.3.3 Clear Floor Space. For the purposes of Type B units, the clear floor space shall be 48 inches (1220mm) minimum in length and 30 inches (760 mm) minimum in width. (3-13L-12)~~

1104.4 Walking Surfaces. Walking surfaces that are part of an accessible route shall comply with Section 1104.4.

1104.4.1 Clear Width. Clear width of an accessible route shall comply with Section 403.5.

EXCEPTIONS:

1. **180 Degree Turn.** Where an accessible route makes a 180 degree turn around an object that is less than 48 inches (1220 mm) in width, clear widths shall be 42 inches (1065 mm) minimum approaching the turn, 48 inches (1220 mm) minimum during the turn and 42 (1065 mm) inches minimum leaving the turn.
2. **Turn Around an Object.** Where an accessible route makes a 180 degree turn around an object that is less than 48 inches (1220 mm) in width, the clear width approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum Where the clear width during the turn is 60 inches (1525 mm) minimum.
3. **90 Degree Turn.** Where an accessible route makes a 90 degree turn the clear widths approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum.
4. **Clear Width.** The clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

1104.4.2 Changes in Level. Changes in level shall comply with Section 303.

EXCEPTION: Where exterior deck, patio or balcony surface materials are impervious, the finished exterior impervious surface shall be 4 inches (100 mm) maximum below the floor level of the adjacent interior spaces of the unit.

1104.5 Doors and Doorways. Doors and doorways shall comply with Section 1104.5.

1104.5.1 Primary Entrance Door. The primary entrance door to the unit shall comply with Section 404.

EXCEPTION:

1. **Storm and Screen Doors.** Storm and screen doors serving individual dwelling or sleeping units are not required to comply with Section 404.2.5.
2. **Maneuvering Clearance.** For the maneuvering clearance at swinging doors, for the front approach direction on the push side the dimension perpendicular to the door shall be 48 inches (122 mm) minimum.
3. **Clearance at Sliding and Folding Doors.** For the maneuvering clearance at sliding and folding doors, for the front approach direction the dimension perpendicular to the door shall be 48 inches (122 mm) minimum.

1104.5.2 User Passage Doorways. Doorways intended for user passage shall comply with Section 1104.5.2.

1104.5.2.1 Clear Width. Doorways shall have a clear opening of 31³/₄ inches (810 mm) minimum. Clear opening of swinging doors shall be measured between the face of the door and stop, with the door open 90 degrees.

1104.5.2.1.1 Double Leaf Doorways. Where the operable parts on an inactive leaf of a double leaf doorway are located more than 48 inches (1220 mm) or less than 15 inches (380 mm) above the floor, the active leaf shall provide the clearance required by Section 1004.5.2.1.

1104.5.2.2 Thresholds. Thresholds shall comply with Section 303.

EXCEPTION: Thresholds at exterior sliding doors shall be permitted to be $\frac{3}{4}$ inch (19 mm) maximum in height, provided they are beveled with a slope not steeper than 1:2.

1104.5.2.3 Automatic Doors. Automatic doors shall comply with Section 404.3.

EXCEPTION: Unobstructed Reach. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the floor

1104.6 Ramps. Ramps shall comply with Section 405.

1104.7 Elevators. Elevators within the unit shall comply with Section 407, 408, or 409.

EXCEPTION:

- 1. In a Private Residential Elevators, the inside dimensions of elevator cars shall provide a clear floor space in accordance with Section 1104.1.1.**
- 2. Controls. Unobstructed forward reach for controls shall be permitted to comply with Section 1004.1.3.**
- 3. Unobstructed Reach. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the floor**

1104.8 Platform Lifts. Platform lifts within the unit shall comply with Section 410.

EXCEPTION:

- 1. Doors. Platform lifts with a single door or doors on opposite ends shall provide a clear floor width of 36 inches (915 mm) minimum and a clear floor space complying with Section 1104.1.1.**
- 2. Unobstructed forward reach for controls shall be permitted to comply with Section 1004.1.3.**
- 3. Controls. Unobstructed forward reach for controls shall be permitted to comply with Section 1004.1.3.**
- 4. Unobstructed Reach. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the floor.**

1004.9 Operable Parts. Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Sections ~~309.2~~ 1104.1.1 and 309.3.

EXCEPTIONS:

- 1. Unobstructed forward reach for operable parts shall be permitted to comply with Section 1004.1.3**
- 2. Receptacle outlets serving a dedicated use.**
- 3. In a kitchen, where two or more receptacle outlets are provided above a length of counter top that is uninterrupted by a sink or appliance, only one receptacle outlet shall not be required to comply with Sections ~~309.2~~ 1104.1.1 and 309.3.**
- 4. In a kitchen, where a clear floor space for a parallel approach cannot be located at a counter**

top in a corner between appliances, receptacle outlets over the counter top shall not be required to comply with Sections ~~309.2~~ 1104.1.1 and 309.3 provided that the counter top is 7 square feet (0.65 m²) maximum.

5. Floor receptacle outlets.
 6. HVAC diffusers.
 7. Controls mounted on ceiling fans.
 8. Controls or switches mounted on appliances.
 9. Plumbing fixture controls.
 10. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
11. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to be accessible.
12. Within kitchens and bathrooms, lighting controls, electrical switches and receptacle outlets are permitted to be located over cabinets with counter tops 36 inches (915 mm) maximum in height and 25-1/2 inches (650 mm) maximum in depth.

1104.10 Laundry Equipment. Washing machines and clothes dryers shall comply with Section 1104.10.

1104.10.1 Clear Floor Space. A clear floor space complying with Section ~~305.3~~ 1104.1.1 shall be provided for each washing machine and clothes dryer. A parallel approach shall be provided for a top loading machine. A forward or parallel approach shall be provided for a front loading machine.

1104.11 Toilet and Bathing Facilities. Toilet and bathing fixtures shall comply with Section 1104.11.

EXCEPTION: Fixtures on levels not required to be accessible.

1104.11.1 Grab Bar and Shower Seat Reinforcement. Reinforcement shall be provided for the future installation of grab bars and shower seats at water closets, bathtubs, and shower compartments. Where walls are located to permit the installation of grab bars and seats complying with Section 604.5 at water closets; grab bars complying with Section 607.4 at bathtubs; and for grab bars and shower seats complying with Sections, 608.3, 608.2.1.3, 608.2.2.3 and 608.2.3.2 at shower compartments; reinforcement shall be provided for the future installation of grab bars and seats complying with those requirements.

EXCEPTIONS:

1. In a room containing only a lavatory and a water closet, reinforcement is not required provided the room does not contain the only lavatory or water closet on the accessible level of the unit.
2. At water closets reinforcement for the side wall vertical grab bar component required by Section 604.5 is not required.
3. At water closets where wall space will not permit a grab bar complying with Section 604.5.2, reinforcement for a rear wall grab bar 24 inches (610 mm) minimum in length centered on the water closet shall be provided.
4. At water closets where a side wall is not available for a 42-inch (1065 mm) grab bar complying with 604.5.1, reinforcement for a sidewall grab bar, 24 inches (610 mm) minimum in length, located 12 inches (305 mm) maximum from the rear wall, shall be provided.
5. At water closets where a side wall is not available for a 42- inch (1065 mm) grab bar complying with Section 604.5.1 reinforcement for a swing-up grab bar complying with Section 1104.11.1.1 shall be permitted.

6. At water closets where a side wall is not available for a 42-inch (1065 mm) grab bar complying with 604.5.1 reinforcement for two swing-up grab bars complying with Section 1104.11.1.1 shall be permitted to be installed in lieu of reinforcement for rear wall and side wall grab bars.
7. In shower compartments larger than 36 inches (915 mm) in width and 36 inches (915 mm) in depth reinforcement for a shower seat is not required

1104.11.1.1 Swing-up Grab Bars. A clearance of 18 inches (455 mm) minimum from the centerline of the water closet to any side wall or obstruction shall be provided where reinforcement for swing-up grab bars is provided. When the approach to the water closet is from the side, the 18 inches (455 mm) minimum shall be on the side opposite the direction of approach. Reinforcement shall accommodate a swing-up grab bar centered 15-3/4 inches (400 mm) from the centerline of the water closet and 28 inches (710 mm) minimum in length, measured from the wall to the end of the horizontal portion of the grab bar. Reinforcement shall accommodate a swing-up grab bar with a height in the down position of 33 inches (840 mm) minimum and 36 inches (915 mm) maximum. Reinforcement shall be adequate to resist forces in accordance with Section 609.8.

EXCEPTION: Where a water closet is positioned with a wall to the rear and to one side, the centerline of the water closet shall be 16 inches (405 mm) minimum and 18 inches (455 mm) maximum from the sidewall.

1104.11.2 Clear Floor Space. Clear floor spaces required by Section 1104.11.3.1 (Option A) or 1104.11.3.2 (Option B) shall comply with Sections 1104.11.2 and ~~305.3~~ 1104.1.1.

1104.11.2.1 Doors. Doors shall not swing into the clear floor space or clearance for any fixture.

EXCEPTION: Where a clear floor space complying with Section 1104.1.1, excluding knee and toe clearances under elements, is provided within the room beyond the arc of the door swing.

1104.11.2.2 Knee and Toe Clearance. Clear floor space complying with Section 1104.1.1, at fixtures shall be permitted to include knee and toe clearances complying with Section 306.

1104.11.3 Toilet and Bathing Areas. Either all toilet and bathing areas provided shall comply with Section 1104.11.3.1 (Option A), or one toilet and bathing area shall comply with Section 1104.11.3.2 (Option B).

1104.11.3.1 Option A. Each fixture provided shall comply with Section 1104.11.3.1.

EXCEPTIONS:

1. Where multiple lavatories are provided in a single toilet and bathing area such that travel between fixtures does not require travel through other parts of the unit, not more than one lavatory is required to comply with Section 1104.11.3.1.
2. A lavatory and a water closet in a room containing only a lavatory and water closet, provided the room does not contain the only lavatory or water closet on the accessible level of the unit.

1104.11.3.1.1 Lavatory. A clear floor space complying with Section ~~305.3~~ 1104.1.1, positioned for a parallel approach, shall be provided at a lavatory. The clear floor space shall be centered on the lavatory.

EXCEPTION: A lavatory complying with Section 606 shall be permitted. Cabinetry shall be permitted under the lavatory provided the following criteria are met.

- (a) The cabinetry can be removed without removal or replacement of the lavatory; and

- (b) The floor finish extends under the cabinetry; and
- (c) The walls behind and surrounding the cabinetry are finished.

1104.11.3.1.2 Water Closet. The water closet shall comply with Section 1104.11.3.1.2.

1104.11.3.1.2.1 Location. The centerline of the water closet shall be 16 inches (405 mm) minimum and 18 inches (455 mm) maximum from one side of the required clearance.

1104.11.3.1.2.2 Clearance. Clearance around the water closet shall comply with Sections 1104.11.3.1.2.2.1 through 1104.11.3.1.2.2.3.

EXCEPTION: Clearance complying with Sections 1103.11.2.4.2 through 1103.11.2.4.4.

1104.11.3.1.2.2.1 Clearance Width. Clearance around the water closet shall be 48 inches (1220 mm) minimum in width, measured perpendicular from the side of the clearance that is 16 inches (405 mm) minimum and 18 inches (455 mm) maximum from the water closet centerline.

1104.11.3.1.2.2.2 Clearance Depth. Clearance around the water closet shall be 56 inches (1420 mm) minimum in depth, measured perpendicular from the rear wall.

1104.11.3.1.2.2.3 Increased Clearance Depth at Forward Approach. Where a forward approach is provided, the clearance shall be 66 inches (1675 mm) minimum in depth, measured perpendicular from the rear wall.

1104.11.3.1.2.2.4 Clearance Overlap. A vanity or other obstruction 24 inches (610 mm) maximum in depth, measured perpendicular from the rear wall, shall be permitted to overlap the required clearance, provided the width of the remaining clearance at the water closet is 33 inches (840 mm) minimum.

1104.11.3.1.3 Bathing Fixtures. Where provided, a bathtub shall comply with Section 1104.11.3.1.3.1 or 1104.11.3.1.3.2 and a shower compartment shall comply with Section 1104.11.3.1.3.3.

1104.11.3.1.3.1 Parallel Approach Bathtubs. A clearance 60 inches (1525 mm) minimum in length and 30 inches (760 mm) minimum in width shall be provided in front of bathtubs with a parallel approach. Lavatories complying with Section 606 shall be permitted in the clearance. A lavatory complying with Section 1104.11.3.1.1 shall be permitted at one end of the bathtub if a clearance 48 inches (1220 mm) minimum in length and 30 inches (760 mm) minimum in width is provided in front of the bathtub.

1104.11.3.1.3.2 Forward Approach Bathtubs. A clearance 60 inches (1525 mm) minimum in length and 48 inches (1220 mm) minimum in width shall be provided in front of bathtubs with a forward approach. A water closet and a lavatory shall be permitted in the clearance at one end of the bathtub.

1104.11.3.1.3.3 Shower Compartment. If a shower compartment is the only bathing facility, the shower compartment shall have dimensions of 36 inches (915 mm) minimum in width and 36 inches (915 mm) minimum in depth. A clearance of 48 inches (1220 mm) minimum in length, measured perpendicular from the shower head wall, and 30 inches (760 mm) minimum in depth, measured from the face of the shower compartment, shall be provided.

EXCEPTION: A shower compartment with dimensions of 30 inches (760 mm) minimum in depth and 44 inches (1120 mm) minimum in width shall be permitted.

1104.11.3.2 Option B. One of each type of fixture provided shall comply with Section 1104.11.3.2. The accessible fixtures shall be in a single toilet/bathing area, such that travel between fixtures does not require travel through other parts of the unit.

1104.11.3.2.1 Lavatory. Lavatories shall comply with Sections 1104.11.3.1.1 and 1104.11.3.2.1.

1104.11.3.2.1.1 Height. The front of the lavatory shall be 34 inches (865 mm) maximum above the floor, measured to the higher of the rim or counter surface.

1104.11.3.2.2 Water Closet. The water closet shall comply with Section 1104.11.3.1.2.

1104.11.3.2.3 Bathing Fixtures. The accessible bathing fixture shall be a bathtub complying with Section 1104.11.3.2.3.1 or a shower compartment complying with Section 1104.11.3.2.3.2

1104.11.3.2.3.1 Bathtub. A clearance 48 inches (1220 mm) minimum in length measured perpendicular from the control end of the bathtub, and 30 inches (760 mm) minimum in width shall be provided in front of bathtubs.

1104.11.3.2.3.2 Shower Compartment. A shower compartment shall comply with Section 1104.11.3.1.3.3.

1104.12 Kitchens. Kitchens and kitchenettes shall comply with Section 1104.12.

1104.12.1 Clearance. Clearance complying with Section 1104.12.1 shall be provided.

1104.12.1.1 Minimum Clearance. Clearance between all opposing base cabinets, counter tops, appliances, or walls within kitchen work areas shall be 40 inches (1015mm) minimum.

1104.12.1.2 U-Shaped Kitchens. In kitchens with counters, appliances, or cabinets on three contiguous sides, clearance between all opposing base cabinets, countertops, appliances, or walls within kitchen work areas shall be 60 inches (1525 mm) minimum.

EXCEPTION: U-shaped kitchens with an island shall be permitted to comply with Section 1104.12.1.1.

1104.12.2 Clear Floor Space. Clear floor space at appliances shall comply with Sections 1104.12.2 and ~~305.3~~ 1104.1.1.

EXCEPTION: Where the clear floor space complying with Section 1104.1.1 is positioned for a forward approach, the alcove shall comply with Section 1104.1.2.

1104.12.2.1 Sink. A clear floor space complying with Section 1104.1.1 positioned for a parallel approach to the sink, shall be provided. The clear floor space shall be centered on the sink bowl.

EXCEPTION: A sink with a forward approach complying with Section 1103.12.4.1, except the clear floor space shall be permitted to comply with Section 1104.1.1 and the alcove with Section 1104.1.2.

1104.12.2.2 Dishwasher. A clear floor space positioned for a parallel or forward approach to the dishwasher, shall be provided. The dishwasher door in the open position shall not obstruct the clear floor space for the dishwasher.

1104.12.2.3 Cooktop. Cooktops shall comply with Section 1104.12.2.3.

1104.12.2.3.1 Approach. A clear floor space positioned for a parallel or forward approach to the cooktop, shall be provided.

1104.12.2.3.2 Forward approach. Where the clear floor space is positioned for a forward approach, knee and toe clearance complying with Section 1104.1.1 and 1104.1.2 shall be provided. The underside of the cooktop shall be insulated or otherwise configured to prevent burns, abrasions, or electrical shock.

1104.12.2.3.3 Parallel approach. Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on the appliance.

1104.12.2.4 Oven. A clear floor space positioned for a parallel or forward approach adjacent to the oven shall be provided. The oven door in the open position shall not obstruct the clear floor space for the oven.

1104.12.2.5 Refrigerator/Freezer. The refrigerator/freezer shall comply with Section 1104.12.2.5.

1104.12.2.5.1 Approach. A clear floor space positioned for a parallel or forward approach to the refrigerator/freezer shall be provided.

1104.12.2.5.2 Forward Approach. Where the clear floor space is positioned for a forward approach, the centerline of the clear floor space shall be offset 15 inches (380 mm) maximum from the centerline of the appliance.

1104.12.2.5.3 Parallel Approach. Where the clear floor space is positioned for a parallel approach, the centerline of the clear floor space shall be offset 24 inches (610 mm) maximum from the centerline of the appliance.

1104.12.2.6 Trash Compactor. A clear floor space, positioned for a parallel or forward approach to the trash compactor, shall be provided.

Reason: The proposed modification addresses only the Type B dwellings unit. The proposal includes all of the changes approved for the Type B Dwelling Unit acted on during the committee process to develop the next version of the ANSI standard. The changes in the comment are intended to allow the Type B dwelling unit to remain technically as it was in the 2009 version of the standard by not incorporating the changes in the buildings blocks for clear floor space, turning circle and U-turn, etc. that were approved during the committee deliberations.

Correction to Public Comment 4 to 4-44-12. This replaces the public comment published.

4-44-12 PC4

Jean Tessmer, representing self.

Further revise as follows:

705.6 Size. Detectable warning surfaces shall extend 0 24 inches (610 mm) minimum in the direction of pedestrian travel. At curb ramps and blended transitions, detectable warning surfaces shall extend the full width of the curb ramp run excluding any flared sides or blended transition. At pedestrian at-grade rail crossings not located within a street or highway, detectable warnings shall extend the full width of the crossing. At boarding platforms for buses and rail vehicles, detectable warning surfaces shall extend the full length of the public use areas of the platform. At boarding and alighting areas at sidewalk or street level transit stops for rail vehicles, detectable warning surfaces shall extend the full length of the transit stop.

705.6 Size. Detectable warning surfaces shall extend 24 inches (610 mm) minimum in the direction of pedestrian travel. On surfaces with less than 2.1% slopes in any direction. ~~At curb ramps and blended transitions, detectable warning surfaces shall extend the full width of the curb ramp run excluding any flared sides or blended transition.~~ At pedestrian at-grade rail crossings not located within a street or highway, detectable warnings shall extend the full width of the less than 2.1% sloped in any direction, level crossing. At boarding platforms for buses and rail vehicles, detectable warning surfaces shall extend the full length of the less than 2.1% public use areas of the platform. At boarding and alighting areas at sidewalk or street level transit stops for rail vehicles, detectable warning surfaces shall extend the full length of the less than 2.1% level transit stop surface.

Reason: The dome style "Detectable warnings", are hazardous to the elderly and ambulatory persons. They cause wheelchair users more effort to traverse and have caused trips and falls and serious permanent debilitating injury. Children are prone to falling face first on hard surfaces while running what if they fell face first on a dome. DOT has my comments on DW's on their website. I believe there are also photos. There needs to be a non-hazardous alternative to the domes. The doctor said it was like the person was hit on the head with a hammer when they fell on the domes.

Correction to Public Comment 5 to 5-22-12. The correct number in item 2 of Section 506.2 is 5 pounds

5-22-12 PC5

Julie Ruth, representing American Architectural Manufacturers Association

Further revise as follows:

506.1 General. Where operable windows are provided in an accessible room or space, at least one shall be accessible and have operable parts complying with Section 309. Where operable windows required to provide natural ventilation or operable windows are required to provide an emergency escape and rescue openings that window shall be the accessible operable window.

EXCEPTIONS:

1. Operable windows that are operated only by employees are not required to comply with this section.
2. Operable windows in Type A units that comply with Section 1003.13.
3. Operable skylights are not required to comply with this section.

506.2 Opening force. The opening force for opening operable windows shall be as follows:

1. ~~8.5~~ 5 pounds (~~37.7~~ 22.2 N) maximum for casement ~~or horizontal sliding or rotary operated projected~~ windows
2. 5 pounds (22.2 N) maximum for crank or motor operated vertical or horizontal sliding windows
- ~~2~~ 3 . 25 pounds (111 N) maximum for other vertical sliding and double hung windows
4. 12 pounds (52.5 N) maximum for non-rotary operated projected windows
5. 10 pounds (45 N) maximum for other horizontal sliding windows

((Balance of 5-22-12 remains unchanged))

Reason: The purpose of this comment is twofold:

1. Establish challenging but achievable maximum operating forces for all types of operable windows.
2. Provide the building designer or architect the option of specifying operable windows that meet the 5 pound force requirement of Section 309 of ANSI A117 if they desire to do so, with the understanding that such a choice will severely limit the types of operating windows that can be used to serve accessible spaces.

An informal survey of window manufacturers whose products meet the structural, water penetration resistance and forced entry requirements of the 2012 International Building Code indicates that the maximum force required to operate these windows varies widely, depending upon the size and operator type of the window. 41 product lines were included in the survey. The survey findings indicated:

1. Only 1 Class AW window could meet the 5 pound operating force limit. That window was a 3 foot high by 5 foot wide, rotary operated awning window. Note Class AW and CW windows are considered to be commercial grade windows. These are the class of windows typically used in hospitals and other large, commercial buildings.

The force required to operate other awning windows included in the survey ranged from 6 pounds for a Class CW window of the same size which was also rotary operated, to 12 pounds for a Class AW window of the same size that was not rotary operated.

2. Only 1 Class LC window could meet the 5 pound operating force limit. That window was a 3 foot wide by 6 foot high casement window. Note Class LC windows are intended for "light" commercial applications. They are typically used for smaller commercial buildings such as one or two story office buildings or hotels whose opening sizes are more similar to those in residential construction than those in commercial construction.

The force to operate other casement windows included in the survey ranged from 6 pounds for a 3 foot high by 5 foot wide Class AW casement to 14 pounds for a 6 foot wide by 5 foot high Class AW casement.

3. There was also 1 Class R window that could meet the 5 pound operating force limit. That window was a 6 foot wide by 6 foot high horizontal sliding window. Class R windows are intended for residential or light commercial construction. The requirements of the IBC and IRC in terms of resistance to structural load, air leakage and water resistance, are not as stringent for Class R and LC windows as they are for Class CW and AW windows.

The force to operate other horizontal sliding windows included in the survey ranged from 10 pounds for a 6 foot high by 6 foot wide Class R horizontal sliding windows to 28 pounds for a 6 foot wide by 5 foot high Class LC horizontal sliding window. Only 1 Class C horizontal sliding window was included in the survey. It was 6 foot wide by 6 foot high, and had an operating force of 15 pounds.

4. The lowest operating force for any hung or vertically sliding window was 20 pounds. That window was a 4 foot by 5 foot Class R window.

The force to operate other Class R or LC hung or vertically sliding windows included in the survey ranged from 21 pounds to 60 pounds.

5. The lowest operating force for any Class AW or CW hung or vertically sliding window was 33 pounds. That window was a 5 foot wide by 8 foot high (both sashes) Class AW double hung window.

The force to operate other Class AW or CW windows included in the survey ranged from 35 to 58 pounds.

Based upon these survey results AAMA is recommending:

1. The 5 pound maximum operating force be maintained for casement, rotary operated projected or crank or motor operated vertical or horizontal sliding windows.
2. A maximum operating force of 12.5 pounds be established for non-rotary operated projected windows.
3. A maximum operating force of 25 pounds be maintained for all other vertical sliding windows.
4. A maximum operating force of 10 pounds be established for horizontal sliding windows.

Establishing a 5 pound maximum operating force for some types of windows will allow a building designer or architect to specify only windows that meet the 5 pound operating force limit specified elsewhere in ANSI A117 for operable components, if they choose to do so. Permitting higher operating forces for other types of windows would expand the window choices a designer has. It is hoped that the combination of these two approaches will reduce the likelihood that the building designer or architect will choose to simply not specify any operable windows in accessible spaces. It should be noted that the maximum operating forces proposed in this comment are achievable, but they would be a challenge to the window manufacturer and they are definitely NOT standard practice.

Correction to Public Comment 4 to 4-46-12, attempting to include arrows in the figures.

6-46-12 PC4

Curt Wiehle, Minnesota Construction Codes and Licensing, representing self

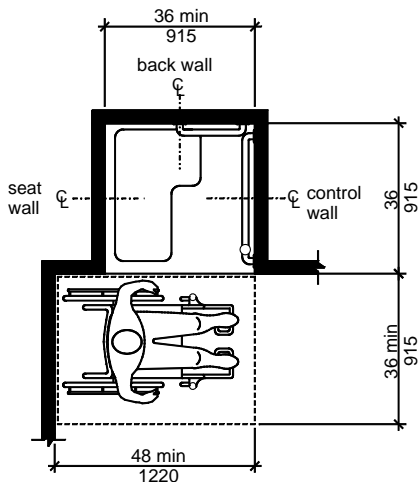
Further revise as follows:

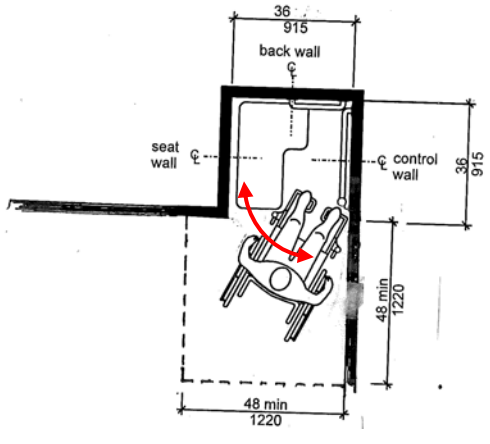
608.2.1.2 Clearance. A clearance of ~~48~~ 52 inches (~~1220~~ 1330 mm) minimum in length measured perpendicular from ~~12 inches (305 mm) beyond the seat~~ the control wall, and ~~36~~ 48 inches (~~915~~ 1220 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

Reason: Delete this figure

The existing figure to accompany this provision should be modified because transfers for individuals who are non-weight bearing or non-ambulatory are not linear transfers. The figure implies a transfer position that is non-functional and impossible for non-weight bearing and non-ambulatory individuals to transfer from. This linear figure should not appear anywhere in the standard. Non-weight bearing and non-ambulatory wheelchair users will position the wheelchair anywhere from a 45 degree angle to a 90 degree angle from the shower seat. They will run the front of the wheelchair (feet) into the shower as far as possible and plant their feet and pivot in an arc to the shower seat. Additional floor space beyond the control wall is useless and unnecessary for this type of transfer. To accommodate the larger clear floor space of the wheelchair, additional depth of the clearance is required. This arc type transfer is similar for transferring to any object, water closet, bench, etc.

Note to Committee. *The figures submitted by Mr. Wiehle both include a red arrow indicating the directions of transfer to and from the shower seat. Unfortunately my technology is preventing the arrow in the first figure from appearing. It should be located vertically across the person's shoulders and to the midpoint of the seat. The second figure shows the arrow as supplied by Mr. Wiehle.*





Correction to Public Comment 3 to 10-2-12. In addition to Mr. Perry's reason statement, the published statement duplicated the Reason statement of PC4.

10-2-12 PC3

Larry Perry, representing self

Disapprove the change. Return the text to that found in existing standard.

Reason: This proposal is almost entirely scoping and is inappropriate for inclusion in the standard. This language should be submitted to building codes for adoption with the other scoping provisions for A117.1.

The proposed text for centralized mail receptacles applies only where mailboxes are assigned to specific units; USPS recommends that mailboxes be numbered sequentially, and not be tied to specific unit numbers; this is for security purposes. As written, there would be no requirements for these configurations.

The proposed 50% accessible, plus 10% 'spare' accessible mailboxes, is not warranted. Adding a technical exception that would allow mailboxes at up to 54" high with an unobstructed side reach would allow a higher percentage of mailboxes to be deemed 'accessible' without impacting space requirements severely.

Outgoing mail slots are not addressed by the proposed text.

Centralized mailbox installations are subject to USPS 4C standard if they are to be used by USPS for mail delivery.

Proposals to address these installations, already subject to the USPS standard, should be developed in concert with the USPS. The standard establishes minimum heights above the minimums allowed by A117.1, thereby reducing the space available for accessible boxes. Standard configurations without parcel lockers (which can be eliminated where there is another approved means for USPS to deliver packages, such as a concierge) typically provide more than 50% of mailboxes at 54" or less.
