



UNRESOLVED ISSUES REPORT

The following issues have not been resolved to the satisfaction of the proponent of each proposal

January 3, 2014

ICC/ANSI A117.1 STANDARD DEVELOPMENT - 2014 EDITION

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

January 21 – 24, 2014.

**U.S. Access Board Conference Room
Washington, DC.**

3-5 – 12

Ed Roether, Chair of Harmonization Task Group, proponent, asks for further consideration of Proposal 3-5-12.

Reason: Many valid points and concerns were raised during the ballot stage, but based upon the committee's action, comment 3-5 is unresolved. Potentially, some items in the proposal may be unresolvable. But, in an effort to reach a consensus please consider the following comments: The proposed change to 304.2 is consistent with the ADA Advisory to 304.2 and therefore harmonizes with the 2010 ADA Standards. It is recognized that the ANSI Standards can exceed ADA, but please understand that many floor surfaces are incapable of providing a pure planar surface. If ANSI's intent is for a pure planar surface then the Standard would prohibit some floor surfaces even though many members of the committee would consider many of those "non-compliant" floor surfaces acceptable. The ANSI Standard does not include the clarifying language regarding its intent that is found in the ADA Standards where it states: "changes in level refers to surfaces with slopes and to surfaces with abrupt rise exceeding that permitted in Section 303.3".

The proposed change to 305.2, 404.2.3.1, 405.7.1, 502.5, 503.4 & 802.2 is intended for harmonization with the 2010 ADA Standards based upon the ADA Advisory to 304.2 statement that the phrase "changes in level refers to surfaces with slopes and to surfaces with abrupt rise exceeding that permitted in Section 303.3. Such changes in level are prohibited in required clear floor and ground spaces, turning spaces, and in similar spaces where people using wheelchairs and other mobility devices must park their mobility aids such as in wheelchair spaces, or maneuver to use elements such as at doors, fixtures, and telephones."

If the committee cannot accept the limits of 303.3 then the question to be answered is what limits would be acceptable for 304.2, 305.2, 404.2.3.1, 405.7.1, 502.5, 503.4 & 802? This proposed change was to harmonize with the 2010 ADA Standards. A pure planar surface for each of these conditions is unrealistic considering construction materials currently available. Developing limits that are attainable would better assure that each of these conditions could be constructed in compliance with the committee's intent. This comment will be unresolved until the committee's intent is clarified.

The remaining proposed changes account for where the term "changes in level" occurred within the standards. However, 504.4 address conditions where people using wheelchairs and other similar mobility devices would not park or maneuver. Even though other mobility aids would use the tread surface, this may not truly be a harmonization issue. It should receive similar consideration regarding the committee's intent, but for this comment the proposed change to 504.4 in 3-5 is withdrawn. Similarly, the committee's action to 405.4 is accepted and harmonizes with the 2010 ADA Standards, so a proposed change to 405.4 in 3-5 is not included with this comment.

304 Turning Space

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 Clear Floor or Ground Space

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 Manual doors

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.

405 Ramps

405.7.1 Slope. Landings 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 landings.

502 Parking spaces

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. Changes in level exceeding that permitted by Section 303.3 are not permitted within the parking spaces and access aisles.

503 Passenger loading zones

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. Changes in level exceeding that permitted by Section 303.3 are not permitted within the vehicle pull-up spaces and access aisles.

802 Wheelchair spaces

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. Changes in level exceeding that permitted by Section 303.3 are not permitted within the floor surface of wheelchair space locations.

Background to 3-5-12

Proposed Change as Submitted

Proponent: Ed Roether, representing the ADA/A117 Harmonization Task Group

Revise as follows:

304 Turning Space

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 Clear Floor or Ground Space

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.~~

403 Walking Surfaces

403.4 Changes in Level. Changes in level shall comply with 303.

404.2 Manual doors

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.

404.2.4 Thresholds. If provided, thresholds at doorways shall be $\frac{1}{2}$ inch (13 mm) maximum in height. Raised thresholds and changes in level at doorways shall comply with Sections 302 and 303.

EXCEPTION: An existing or altered threshold shall be permitted to be $\frac{3}{4}$ inch (19 mm) maximum in height provided that the threshold has a beveled edge on each side with a maximum slope of 1:2 for the height exceeding $\frac{1}{4}$ inch (6.4 mm).

404.3 Automatic doors

404.3.3 Thresholds. Thresholds and changes in level at doorways shall comply with Section 404.2.4.

405 Ramps

405.4 Floor Surfaces. Floor surfaces of ramp runs shall comply with Section 302. Changes in level exceeding that permitted by Section 303.3 other than the running slope and cross slope are not permitted on ramp runs.

405.7.1 Slope. Landings 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 landings.

407.4 Elevator Cars

407.4.2 Floor Surfaces. Floor surfaces in elevator cars shall comply with Section 302.

408.4 LULA cars

408.4.2 Floor Surfaces. Floor surfaces in elevator cars shall comply with Section 302.

409.4 Private residence elevator cars

409.4.2 Floor Surfaces. Floor surfaces in elevator cars shall comply with Section 302.

410.2 Platform lifts

410.3 Floor Surfaces. Floor surfaces of platform lifts shall comply with Section 302.

502 Parking spaces

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. Changes in level exceeding that permitted by Section 303.3 are not permitted within the parking spaces and access aisles.

503 Passenger loading zones

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. Changes in level exceeding that permitted by Section 303.3 are not permitted within the vehicle pull-up spaces and access aisles.

504 Stairways

504.4 Tread Surface. Stair treads shall comply with Section 302 and shall have a slope not steeper than 1:48. Changes in level exceeding that permitted by Section 303.3 are not permitted within the stair tread.

802 Wheelchair spaces

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. Changes in level exceeding that permitted by Section 303.3 are not permitted within the floor surface of wheelchair space locations.

1103 Recreational Boat Launches

1103.2.1 Boat Slips. An accessible route shall serve boat slips.

Exceptions:

8. Changes in level complying with 303.3 and 303.4 shall be permitted on the surfaces of gangways and boat launch ramps.

Reason: The ADA/A117 Harmonization Task Group (HTG) was created as a task group of the A117.1 Committee to compare the 2010 ADA with the 2009 A117.1 Standard. The HTG has recommend a series of changes through a set of change proposals. The HTG is recommending changes, for the most part, address where the ADA was viewed as more stringent than the A117. Where the A117 contained provisions not addressed in the ADA, these were not considered a conflict needing action to amend the A117. In addition there are a number of places where the ADA and A117.1 are different as a result of specific actions, by the A117.1 Committee during the development of the 2009 edition, to remain or create a difference where, in the judgment of the committee the ADA was deficient.

Reason statement for change of level: The preceding sections are where the phrase "changes in level are not permitted" is used, or there is a specific reference to 303. The idea is to try and allow surfaces such as tile and deck boards, but not a threshold or other ¼" to ½" change in vertical surface that will be a 'hitch' in access. I included titles to help put the sections into context. There is also the issue of consistently using the 1:48 within the requirement or as an exception. Suggested revisions in legislative text are based on emails, consistency throughout for A117.1 and the Access Board advisory.

ADA Advisory 304.2 Floor or Ground Surface Exception. As used in this section, the phrase "changes in level" refers to surfaces with slopes and to surfaces with abrupt rise exceeding that permitted in Section 303.3. Such changes in level are prohibited in required clear floor and ground spaces, turning spaces, and in similar spaces where people using wheelchairs and other mobility devices must park their mobility aids such as in wheelchair spaces, or maneuver to use elements such as at doors, fixtures, and telephones. The exception permits slopes not steeper than 1:48.

304.1 Roether .docx

Committee Action

Approval as Modified

Modification

All portions of the original proposal were approved with the exception of the proposed revision to Section 405.4

Ramps.

405.4 Floor Surfaces. Floor surfaces of ramp runs shall comply with Section 302. ~~Changes in level exceeding that permitted by Section 303.3 other than the running slope and cross slope are not permitted on ramp runs.~~

Committee Reason: The proposal addresses in multiple locations the change in level language and provides consistency between the Standard and the ADA advisory regarding the text also used in the ADA 2010. The proposal affecting the ramp provisions were of concern to the Committee in that it might allow materials which would be difficult to negotiate travel across.

BALLOT COMMENTS

3-5.1

Commenter: Kimberly Paarlberg, Representing ICC
Ballot: Affirmative with comment:

Comment: I object only to the modification. The provisions for ramps should be consistent with all other 'level' surfaces such as parking spaces, passenger loading zones, stairways treads, floor surfaces at wheelchair spaces, etc.

3-5.2

Commenter: Gina Hilberry, Representing UCP
Ballot: Negative with comment:

Comment: This proposal inserts the phrase "Changes in level exceeding that permitted by Section 303.3 are not permitted within..." for a series of locations including turning spaces, all required clear floor spaces (305.2), door maneuvering spaces, landings, parking spaces and access aisles, treads of stairs, etc. This means that changes in level (1/4" vertical, 1/2" beveled will be clearly permitted at all of these locations. I do not agree that changes in level of this sort should be (or seem to be) permitted at locations such as maneuvering spaces, turning spaces, landings (e.g. at ramps) or treads of stairs.

Committee Review of Comments and Action – July 2013

Approval as Modified.

Committee Reason: Committee members were concerned that the text allowed a threshold like change of level within various spaces we have always required to be level. On the other side, without some exception, minor changes in level caused by materials such as floor tiles would make absolutely level unachievable. Without any alternative text available to allow the standard to be consistent with the ADA, the committee reconfirmed its original approval as modified action.

Ballot Results:

48 Number eligible to vote

28 Affirmative (Uphold the Committee Recommendation)

11 Negative (Disagree with the Committee Recommendation) Pauls, ACB, AERBVI, DREDF, HLAA, HUD, NATO, NMGCD, PVA, UCP, WID

1 Abstain (from Voting) NFPA

8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

Ballot Results following Recirculation – October 15, 2013:

48 Number eligible to vote

24 Affirmative (Uphold the Committee Recommendation)

15 Negative (Disagree with the Committee Recommendation) Pauls, ACB, AERBVI, DREDF, HLAA, HUD, NATO, NMGCD, PVA, UCP, WID, AOTA, LPA, RESNA, USA

1 Abstain (from Voting) NFPA

8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

Jake Pauls

Negative Ballot:

Comment/reason: This is a complex issue and I do not see the proposed change making the standard clearer or better. While there are general concerns about allowing elevation changes, satisfying 303.3, on several places where a planar floor surface is needed, I am especially concerned about elevation differences on stairway treads where even a 0.25-inch abrupt elevation change is highly problematic. While there may be a problem with current text on this matter, the proposed text does not solve the problem. It needs more work and the best way to get that is to go back to the current text and fix it in a way that satisfies more of the Committee members.

ACB, Chris Bell

Negative Ballot:

Comment/reason: This proposal would create a serious risk of harm for people using mobility devices and for those with other walking disabilities including people like me who have impaired balance and gait issues. Brain damage from my premature birth causes my left leg to drop suddenly without warning when I am walking longer distances. Also, sometimes the result is that I scrape the toe of my left shoe along the pavement. Even a minor elevation can cause me to trip or fall particularly as my balance also is impaired.

Specifically, this proposal inserts the phrase "Changes in level exceeding that permitted by Section 303.3 are not permitted within...." for a series of locations including turning spaces, all required clear floor spaces (305.2), door maneuvering spaces, landings, parking spaces and access aisles, treads of stairs, etc. This means that changes in level (1/4" vertical, 1/2" beveled) will be clearly permitted at all of these locations. Changes in level of this sort should not be permitted at locations such as maneuvering spaces, turning spaces, and landings (e.g. at ramps) or treads of stairs. Persons using mobility devices, persons with an impaired gait and others could get caught on or trip on such elevations, posing a needless risk of potentially serious harm. Whatever the benefit of this change, if any, it is far outweighed by the risk of harm to people with disabilities, including me.

AERBVI – Melanie Hughes

Negative Ballot:

Comment/reason: This proposal inserts the phrase "Changes in level exceeding that permitted by Section 303.3 are not permitted within...." for a series of locations including turning spaces, all required clear floor spaces (305.2), door maneuvering spaces, landings, parking spaces and access aisles, treads of stairs, etc. This means that changes in level (1/4" vertical, 1/2" beveled) will be clearly permitted at all of these locations. Changes in level of this sort should not be permitted at locations such as maneuvering spaces, turning spaces, landings (e.g. at ramps), or treads of stairs. These elements in particular should be as free from level changes as possible. Language should not be added that encourages level changes within these spaces.

DREDF – Marilyn Golden

Negative Ballot

Comment/reason: This proposal inserts the phrase "Changes in level exceeding that permitted by Section 303.3 are not permitted within...." for a series of locations including turning spaces, all required clear floor spaces (305.2), door maneuvering spaces, landings, parking spaces and access aisles, treads of stairs, etc. This means that changes in level (1/4" vertical, 1/2" beveled) will be clearly permitted at all of these locations. Changes in level of this sort should not be permitted at locations such as maneuvering spaces, turning spaces, landings (e.g. at ramps), or treads of stairs. These elements in particular should be as free from level changes as possible. Language should not be added that encourages level changes within these spaces.

HLAA – Sharon Toji
Negative Ballot

Comment/reason: I think this may be one of those "unintended consequences" items. We changed 303.3 to make it clear that the 1/4-inch change must come before the permitted 1/2-inch bevel. However, that kind of interruption of the surface, even a sloped surface, is not appropriate at many of the locations where it would now be clearly permitted, such as treads of stairs, wheelchair spaces or landings. This needs to be revisited so that this type of change will be permitted only where it is appropriate, and in all other locations, the text will be correct for that item.

HUD – Cheryl Kent
Negative Ballot

Comment/reason: This proposal inserts the phrase "Changes in level exceeding that permitted by Section 303.3 are not permitted within..." for a series of locations including turning spaces, all required clear floor spaces (305.2), door maneuvering spaces, landings, parking spaces and access aisles, treads of stairs, etc. This means that changes in level (1/4" vertical, 1/2" beveled) will be clearly permitted at all of these locations. Changes in level of this sort should not be permitted at locations such as maneuvering spaces, turning spaces, landings (e.g. at ramps), or treads of stairs. These elements in particular should be as free from level changes as possible. While the Committee seemed to think that without some exception minor changes in level caused by materials such as floor tiles would make an absolutely level surface unachievable, it has not been our experience that the terminology in the standard has been read this way, e.g., not permitting tiles that have a miniscule change in level.

NATO – Gene Boecker
Negative Ballot:

Comment/reason: While most of the items in the list are useful and help clarify the intent, a couple are safety concerns in addition to not being appropriate. The following should be revised as noted:

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~~ greater than 1/4 inch are not permitted within the maneuvering clearances.

504.4 Tread Surface. Stair treads shall comply with Section 302 and shall have a slope not steeper than 1:48. Changes in level ~~exceeding that permitted by~~ noted in Section 303.3 are not permitted within the stair tread.

404.2.3.1. The maneuvering space must be level without vertical changes. If this is allowed, it would be acceptable to provide a 1/2 inch change in level immediately in front of the threshold since it would be a part of the maneuvering space, then add an additional 1/2 inch at the threshold for a total one inch vertical rise. By acknowledging a 1/4 inch change it is consistent with the allowance for existing or altered threshold in 404.2.4 and can accommodate imperfections like small cracks in the sidewalk or variations in pavers. The language approved needs to be revised.

504.4. Stairs have an inherent hazard risk. They should not be allowed to add a vertical change of up to 1/2 inch. While some imperfections may exist in certain materials and natural variations exist in surfaces like carpet, the proposed text would allow a vertical 1/4 inch lip at the nosing or a 1/2 inch change between one side of the tread and the other. Even detectable warnings are limited to under a 1/4 inch in height. The way it would read the surface of the tread could have dimples that are twice as high. The committee rejected a proposal to allow detectable warnings at the top of stairs because it was deemed a potential trip hazard yet allowed this change.

The other sections of this proposal make sense in large part. These two items must be changed to avoid creating inaccessible entrances and unsafe stairways.

NMGCD – Hope Reed

Negative Ballot:

Comment/reason: ANSI A117.1 is a minimum standard. It is inappropriate to allow rough surfaces in the minimum turning space, minimum door landing area, minimum clear floor area at elements, and similar. In these tight spaces, wheeled mobility devices will have wheels turning at different speeds, different directions, and each wheel can have a varying amount of pressure over it. People with disabilities who may be frail and unstable may already have great difficulty safely maneuvering in the minimum areas allowed. Decorative surfaces, or bumpy surfaces, are appropriate along the border and outside minimum maneuvering clearances.

PVA – Marcus Brown

Negative Ballot:

Comment/reason: This proposal allows for ¼ inch vertical with 1:2 bevel for a maximum level change of 1/2 inch on the floor surface within the Turning Space and the Clear Floor or Ground Space. It is one thing to negotiate a level change like this in a wheelchair when approaching it straight on, but the amount of effort required to negotiate this while turning or hitting it at an angle is greatly increased. This added language moves away from the purpose of making a site, facility, building or element accessible for individuals with disabilities.

I propose all portions of the last approved modifications with the exception of the following modification.

Revise as follows:

304 Turning Space.

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.

305 Clear Floor or Ground Space.

305.2 Floor surfaces. 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.

UCP – Gina Hilberry

Negative Ballot:

Comment/reason: Accepting this modification means that it will be possible for there to be multiple ¼" vertical and ½" beveled level changes on ramp surfaces, landings, stair treads, elevator floors etc. While I understand the concern about tile floors, accepting a surface that will deflect and catch casters to this extent is not accessible. Thresholds can have these changes in surface in part because the person approaching the beveled change is approaching the bump from a perpendicular position. The control of the chair and the ability to apply force to the wheels moving in a straight line allow for the person to make the level transition. If however, the bump is on a landing or other location where the person must simultaneously manage the level change and turn, then the control and force issue change significantly. Approaching a ½" beveled change from an acute angle, performing a turn and powering through the bump all at the same time could be quite difficult.

WID – Hale Zukas

Negative Ballot:

Comment/reason: The phrase "exceeding that permitted by Section 303.3" should be deleted from (at the very least) Sections 304.2 (turning space), 305.2 (clear floor space), 404.2.3.1 (maneuvering clearance at manual doors), 405.4 (ramp runs), 405.7.1 (ramp landings), and 504.4 (stair treads). I can testify from personal experience that changes in level (even those small enough to comply with Section 303.3) on these elements (where more precise and/or extensive movement is often required) can be very

bumpy, disruptive and uncomfortable. Tiles and deck boards (whose use is evidently the primary motivation for this proposal) are particularly problematic.

AOTA – Shoshana Shamberg

Negative Ballot:

Comment/reason: This change allows for an unacceptable degree of level change within critical wheelchair maneuvering clearances.

LPA – Tricia Mason

Negative: Ballot:

Comment/reason: This proposal seems to decrease accessibility by inserting language that inserts an allowance for changes in level that are not there currently. Apparently this is for the purposes of allowing for changes in flooring materials (i.e. concrete to tile); but having these kinds of level changes in the middle of maneuvering spaces, landings, parking spaces and the like is extremely difficult. These changes in level in the middle of a maneuvering space means that as someone is making a turn, the wheel of a device can get caught making it nearly impossible to dislodge. This happens often for scooter users when the front wheel gets caught on a change in level and the front tiller is rendered useless if you do not have the upper body strength to jerk the tiller free. These essential elements should be clear from changes in level as the standard is written today.

RESNA – Edward Steinfeld

Negative Ballot

Comment/reason: Changes in level should not be allowed in maneuvering spaces and clear floor areas.

USA – Dominic Marinelli

Negative Ballot:

Comment/reason: This change allows an unacceptable degree of level change within critical wheelchair maneuvering spaces.

4-33- 12

Joseph Hetzel, proponent, asks for further consideration of Proposal 4-33-12.

We request that Proposal 4-33-12, which was originally disapproved, be approved as modified using Public Comment 4-33.2 and as further modified by the following editorial changes:

404.3 Automatic Doors. Automatic doors and automatic gates shall comply with Section 404.3. Full powered automatic doors shall comply with ANSI/BHMA A156.10 listed in Section 105.2.4. Power-assist and low-energy doors shall comply with ANSI/BHMA A156.19 listed in Section 105.2.3.

EXCEPTION: Doors, doorways, and gates designed to be operated only by security personnel shall not be required to comply with Sections 404.3.2, 404.3.4 and 404.3.5.

Where more than two doors are located at an accessible route entrance to a building or facility, other than dwelling units and sleeping units, at least one door shall be an automatic door. Where an accessible route entrance has a vestibule with more than two exterior entrance doors and more than two interior entrance doors, at least one exterior automatic door and one interior automatic door shall be provided.

Reason: The Committee supports the principle that automatic doors enhance accessibility. To fulfill that principle, the standard needs clear threshold based requirements for specifying automatic doors in locations involving higher public traffic areas.

Deleted: accessible

Deleted: automatic

Deleted: provided

We believe the Committee should be working toward approving a proposal that satisfies the “automatic doors enhance accessibility” principle. Therefore, we believe Committee disapproval of our comment 4-33.2 is insufficient toward that goal. Our response to the Committee reasoning is as follows:

Committee point #1: The proposed text was found to be vague. It is unclear what is intended by ‘accessible doors’?

AAADM response: The proposal intends to address building/facility entrance situations involving more than two doors in an “accessible route”, a term used throughout A117.1 including the Chapter 4 title. Therefore, we have made editorial changes accordingly. Our editorial changes result in the proposed text being clear and not vague.

Committee point #2: Is it clear that across a vestibule that these automatic doors should line up?

AAADM response: A Committee member actually pointed out that doors do not always line up in a vestibule. Exterior doors may be side entrances at a 90 degree angle to interior entrances. Therefore, this Committee point should not be a reason to disapprove the proposal.

Committee point #3: The proposal seemed to make what had been an exception in the original proposal, a requirement.

AAADM response: The originally submitted proposal is a requirement along with two Exceptions to that requirement.

Therefore, we request that the Committee reconsider their action on comment 4-33.2, and approve new language in Section 404.3 supporting accessibility enhancement through automatic doors.

Background to 4-33-12

Proposed Change as Submitted

Proponent: Joseph R. Hetzel, P.E., Thomas Associates, Inc., representing American Association of Automatic Door Manufacturers (AAADM)

Revise as follows:

404.3 Automatic Doors. Automatic doors and automatic gates shall comply with Section 404.3. Full powered automatic doors shall comply with ANSI/BHMA A156.10 listed in Section 105.2.4. Power-assist and low-energy doors shall comply with ANSI/BHMA A156.19 listed in Section 105.2.3.

Exception: Doors, doorways, and gates designed to be operated only by security personnel shall not be required to comply with Sections 404.3.2, 404.3.4 and 404.3.5.

A door that provides a barrier-free path of travel through a pedestrian entrance, and a door in a pedestrian entrance leading from a vestibule into the floor area, shall be a full power automatic door where the entrance serves a hotel, a government building, a building containing a care or detention occupancy, or a building more than 3225 square feet (300 m²) containing an assembly occupancy, a business occupancy or a mercantile occupancy.

EXCEPTIONS:

1. These requirements shall not apply to an individual suite having an area of less than 3225 square feet (300 m²) where located within a building classified as an assembly occupancy, a business occupancy, or a mercantile occupancy, where such suite is completely separated from the remainder of the building.
2. A non-active door leaf in a multiple leaf door in a barrier-free path of travel shall not be required to comply with these requirements.

Reason: The proposed language is based on code language currently in existence, and successfully used, in the province of Ontario, Canada. The occupancies cited as requiring automatic doors are associated with locations where a high degree of public use would be anticipated, and would maximize accessibility in these locations.

404.3 #2-HETZEL.doc

Committee Action

Disapproved

Committee Reason: While members of the Committee expressed support of the concept, the proposal was not appropriate for the Standard, but should be located in a scoping document such as the International Building Code. The term 'barrier-free path of travel' is not consistent with the Standard. 'Government building' is a form of ownership and not an occupancy category. The choice of 3,225 sq. ft. was not justified.

BALLOT COMMENTS

4-33.1

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Negative with comment:

Comment: The Committee rejected this proposal because they thought it was a scoping matter that belonged in the IBC. This proposal could easily be cast into the same format as the other requirements by making an automatic door a mandatory feature in an accessible route – Section 402. The IBC could then make exceptions based on the size of the building. I think this would recognize that automated doors are an essential feature of accessibility. In other countries automated doors are routinely included as part of accessibility mandates. It is time that the US recognized the importance of door automation as a high priority. Working with the proponent, I will craft a specific proposal for July.

Proponent Comment

4-33.2

Commenter: Joseph R. Hetzel, P.E. Thomas Associates, representing American Association of Automatic Door Manufacturers (AAADM)

Revise the proposal as follows:

404.3 Automatic Doors. Automatic doors and automatic gates shall comply with Section 404.3. Full powered automatic doors shall comply with ANSI/BHMA A156.10 listed in Section 105.2.4. Power-assist and low-energy doors shall comply with ANSI/BHMA A156.19 listed in Section 105.2.3.

EXCEPTION: Doors, doorways, and gates designed to be operated only by security personnel shall not be required to comply with Sections 404.3.2, 404.3.4 and 404.3.5.

Where more than two accessible doors are located at entrances to buildings or facilities, other than dwelling units and sleeping units, at least one automatic door shall be provided. Where an accessible entrance has a vestibule with more than two exterior entrance doors and more than two interior entrance doors, at least one exterior automatic door and one interior automatic door shall be provided.

Reason: We are opposed to the Committee action to disapprove 4-33 - 12, and we request that they approve 4-33 - 12 as modified by this public comment. The Committee agreed in concept that a threshold number of doors at entrances should be established at and above which automatic doors would be required.

Committee members referred us to language in the GSA Facilities Standard P100. Under information in "Accessible Public Entrances", the following language is found:

All public entrances provided in accordance with Paragraph F206.4.1 (Public Entrances) of the ABAAS must have at least one entrance door complying with Section 404.3 (Automatic and Power-Assisted Doors and Gates) of the ABAAS. Where an accessible public entrance has a vestibule with exterior and interior entrance doors, at least one exterior door and one interior door must comply with Section 404.3.

Our proposal is an expansion of the above language. The reason we are stipulating "more than two" in our proposed language is to allow for double doors which count as two doors.

Committee Review of Comments and Action – July 2013

Disapproved.

Committee Reason: The committee considered the information provided by the comments. Comment 4-33.2 was specifically discussed. The proposed text was found to be vague. It is unclear what is intended by 'accessible doors'? Is it clear that across a vestibule that these automatic doors should line up? Finally the proposal seemed to make what had been an exception in the original proposal, a requirement. The original disapproval of this item was sustained.

Ballot Results:

48 Number eligible to vote

38 Affirmative (Uphold the Committee Recommendation)

1 Negative (Disagree with the Committee Recommendation) HLA

1 Abstain (from Voting) NFPA

8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

HLA – Sharon Toji

Negative: Ballot:

Comment/reason: Proposed Revision:

402.2 Components. Accessible routes shall consist of one or more of the following components: Walking surfaces with a slope not steeper than 1:20, doors and doorways, including power doors and power assisted doors, gates, ramps, curb ramps excluding the flared sides, elevators and platform lifts. All components of an accessible route shall comply with the applicable portion of this standard.

Reason: This is just one of several attempts to require automatic doors at some locations. There are too many locations where people, and particularly those who lack upper body strength, cannot get into enclosed spaces, or become trapped if there is not someone there to help them exit. Not only is this an important issue for people with long-time disabilities, but also for the many of us who acquire disabilities through aging.

I agree with Ed Steinfeld's earlier comment that Section 402, which lists the various possible components of an accessible route, ought to specifically refer to power doors and power assisted doors as components of an accessible route. This will, as he pointed out, make it more likely for these doors to be scoped in other codes and standards, and exceptions can then be listed for the locations where the doors will not be required.

5-11– 12

David W. Cooper, proponents asks for further consideration of Proposal 5-11-12.

Reason: The committee needs to reconsider the intent of this proposal modified and approved at the July meeting. It has been misunderstood and is a needed proposal. Figure one provides a graphic explanation to clarify the limits and provides a comparison to what is allowed in other codes mentioned in prior comments.

Please see Adobe pdf figure, posted separately.

Background to 5-11-12

Proposed Change as Submitted

Proponent: David W. Cooper, Stairway Manufacturing and Design Consulting, representing Stairway Manufacturers Association

Revise as follows:

504.5 Nosings. ~~The radius of curvature or bevel at the nosing shall not exceed ½ inch (12.7 mm) maximum from~~ at the leading edge of the tread shall be ½ inch (13 mm) maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall be 1 ½ inches (38 mm) maximum over the tread or floor below.

Reason: This proposal provides needed correlation with changes in the building code recognizing that the radius of the curvature is a nonfactor but rather the limitation of the distance from the leading edge.

504.5-COOPER.doc

Committee Action

Disapproved

Committee Reason: The Committee was not convinced that change improved the Standard. There was concern that a beveled nosing would present maintenance issues.

BALLOT COMMENTS

5-11.1

Commenter: Gene Boecker, Representing NATO

Ballot: Negative with comment:

Comment: A bevel is a standard way to address the edge of the nosing on concrete stair design. It has been used for years and should be included in the standard. The length of the nosing deformation is the same as that for a radius but less costly to construct in concrete work. If there is a concern about potential maintenance issues then those should be identified. I am not aware of maintenance problems with the beveled edge design.

5-11.2

Commenter: David W. Cooper, Representing SMA
Ballot: Negative with comment:

Comment: The proposal correlates with the ICC building code. The SMA will submit a modification by public comment to clarify.

5-11.3

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

Proponent Comment

5-11.4

Commenter: David W. Cooper, Representing SMA

Revise the proposal as follows:

504.5 Nosings. ~~The radius of curvature~~ Rounding or beveling at the leading edge of the tread shall be not exceed the limit of a ½ inch (13 mm) radius maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall be 1 ½ inches (38 mm) maximum over the tread or floor below.

Reason: I am opposed to the committee action but recognize that this modification meets the intent of the original proposal. It more simply allows the use of a bevel or curvature while succinctly describing safe limits based on that which is currently allowed in the standard and providing additional design options needed. The limit established would restrict encroachment on to the flat portion of the tread and prevent any beveling that would remove more material than that described by a ½ inch radius. Rounding and Beveling of the leading edge provide for contrast by modeling the reflected light, decreasing likely maintenance and the cost to repair chipped and broken edges that are common when the nosing is left sharp, and offer a softer edge when bumped.

Committee Review of Comments and Action – July 2013

Approval with Modifications based on Comment

Committee Reason: There was discussion whether the beveling standard suggested by Comment 5-11.4 was an appropriate measure. Although there remained disagreement, the majority of the committee concluded that the proposed revision provided improved text. The existing provisions are difficult to achieve with certain materials. The revision will allow for a better edge than the sharp edge currently allowed. The new text will be more stringent than in the NFPA standard.

Modification

504.5 Nosings. ~~The radius of curvature~~ Rounding or beveling at the leading edge of the tread shall be not exceed the limit of a ½ inch (13 mm) radius maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall be 1 ½ inches (38 mm) maximum over the tread or floor below.

Ballot Results:

48 Number eligible to vote

31 Affirmative (Uphold the Committee Recommendation)

1 Affirmative with Comment – HLAA

7 Negative (Disagree with the Committee Recommendation) Pauls, ACB, DREDF, HUD, PVA, RESNA, UCP

1 Abstain (from Voting) NFPA

8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

Ballot Results following Recirculation – October 15, 2013:

48 Number eligible to vote

24 Affirmative (Uphold the Committee Recommendation)

1 Affirmative with Comment – HLA A

14 Negative (Disagree with the Committee Recommendation) Pauls, ACB, DREDF, HUD, PVA, RESNA, UCP, AERBVI, AOTA, ATBCB, LPA, NMGCD, USA, WID

1 Abstain (from Voting) NFPA

8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

HLAA – Sharon Toji

Affirmative with Comment Ballot:

Comment: Proposed revision:

504.5 Nosings. ~~The radius of curvature Rounding or beveling~~ at the leading edge of the tread shall ~~be not exceed the limit of a ½ inch (13 mm) radius maximum.~~ Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall be 1 ½ inches (38 mm) maximum over the tread or floor below.

Reason: Although I am in favor of not only retaining the term "bevel" for the underside of stair nosings, but also adding it to the manner in which the leading edge can be treated, for the reasons given, it is not technically correct to equate the allowed measurement for the size of the bevel with the size of a radius corner. They are two different things, although both allow for a leading edge that is not sharp, and either should be allowed. Therefore, I propose a slight technical change. Radius corners (i.e. "rounding,") and bevels can both be described correctly by a measurement of 1/2 inch.

HUD – Cheryl Kent

Negative Ballot:

Comment: The revised text introduces language that is vague and does not improve the standard. The language currently in the standard, read with the figures, is already clearer than this new language.

Jake Pauls

Negative Ballot:

Comment/reason: I continue to be opposed to the Committee's acceptance of the flawed modification for 504.5 in Proposal 5-11. It does not specify the permitted loss of tread depth correctly for the bevel because a bevel does not have a "radius" or a "radius of curvature." The text is nonsensical and unenforceable as written.

The approved modification was as follows: 504.5 Nosings. The radius of curvature rounding or beveling at the leading edge of the tread shall be not exceed the limit of a ½ inch (13 mm) radius maximum.

One fix is to specify the maximum horizontal distance with which a bevel or rounding departs from horizontal. This is not a complete fix, relative to the requirements in NFPA 101, another ANSI standard that (at least to my knowledge) should be respected when it comes to another ANSI standard tinkering with nosings. NFPA 101 does not treat bevels and rounded nosings the same. A rounded nosing is given credit—for *minimum tread depth requirements*—for that part of its horizontal dimension that slopes less than 20 degrees to the horizontal. Bevels are usually 45 degrees to the horizontal so that a bevel reducing tread depth by 0.5 inch in horizontal dimension is slightly worse (in NFPA 101's rule) than a 0.5-inch radius rounded nosing which loses only 0.33 inch of credit for minimum tread depth. NFPA 101 limits both beveling and the radius to a maximum of 0.5 inch, horizontal, regardless of the tread depth, for example being 11.5 inches, nosing to nosing or greater. **Bottom line, the proposed modification makes the revised rule unenforceable and thus worthy of a negative ballot.**

Incidentally, rounded nosings have some advantages over beveled ones. They produce a useful modeling of reflected light which helps to identify the nosings visually. Secondly, in a fall against

the nosing there is somewhat less risk of injury with the rounded nosing, although a 45-degree bevel is better than a sharp 90-degree corner. Round nosing might also be somewhat less subject to chipping, in the case of materials such as concrete or wood than even a bevel (which, again, is better than a 90-degree corner).

ACB- Chris Bell

Negative Ballot:

Comment/reason: Introduces vague language and does not improve the standard. For example, you can't equate "beveling" with a radius of curvature. Also, the loss of tread depth and the shape of the nosing for placement of feet has important safety implications.

DREDF – Marilyn Golden

Negative Ballot:

Comment/reason: Introduces vague language and does not improve the standard. For example, you can't equate "beveling" with a radius of curvature. Also, the loss of tread depth and the shape of the nosing for placement of feet can cause safety problems.

PVA – Marcus Brown

Negative Ballot:

Comment/reason: The language is vague and allows the possibility for the standard to be used in a manner that would make the condition less accessible. The word 'bevel' indicates slope. A slope is made up of a rise and a run. The ½ inch maximum does not state rise or run. No length is given for the other leg of the slope making the bevel. "Leading edge" is also vague. Where does the bevel start on the leading edge, the top, bottom or somewhere in between?

RESNA – Edward Steinfeld

Negative Ballot:

Comment/reason: The term "bevel" is unique to this proposal. It is vague and undefined and could result in the introduction of safety hazards on stairways.

UCP – Gina Hilberry

Negative Ballot:

Comment/reason: This change does not improve accessibility – and may indeed decrease it.

AERBVI – Melanie Hughes

Negative Ballot:

Comment/reason: The bevel does not contain a radius. The new language does not clarify the standard or improve accessibility. The reason is I am persuaded by other comments.

AOTA – Shoshana Shamberg

Negative Ballot:

Comment/reason: This revised text introduces language that is vague and does not improve the standard. The language currently in the standard, read with the figures, is already clearer than the new language.

ATBCB – Marsha Mazz

Negative Ballot:

Comment/reason: Mr. Pauls' negative ballot is persuasive. We are concerned that if this proposal is approved it will result in a reduction of tread depth and will not provide consistency with the ADA or NFPA requirements.

LPA – Tricia Mason

Negative Ballot:

Comment/reason: LPA has since been convinced that the language in this proposal is too vague and may in fact decrease accessibility. 'Bevel' seems to indicate slope and it is unclear as to where the bevel begins; it has the potential to cause confusion and safety hazards.

NMGCD – Hope Reed**Negative Ballot:**

Comment/reason: This proposal creates confusion by adding the term 'bevel' and it does not improve stair accessibility

USA – Dominic Marientelli**Negative Ballot:**

Comment/reason: This revised text introduces language that is vague and does not improve the standard. The language currently in the standard, read with the figures, is already clearer than the new language.

WID – Hale Zukas**Negative Ballot:**

Comment/reason: The revised text introduces language that is vague and does not improve the standard. The language currently in the standard, read with the figures, is already clearer than the new language.

6-1- 12

Kim Paarlberg, proponent, asks for further consideration of Proposal 6-1-12.

There are two concerns, so I would like to split the question.

Question 1:

602.1 General. Wheelchair accessible drinking fountains shall comply with Sections 602.2 and 307. Drinking fountains for standing persons shall comply with Section 602.3 and 307.

602.2 Wheelchair accessible drinking fountains. Wheelchair accessible drinking fountains shall comply with Section 602.2.1 through 602.2.5.

602.2 602.2.1 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward approach to the drinking fountain, shall be provided. Knee and toe space complying with Section 306 shall be provided. The clear floor space shall be centered on the drinking fountain.

EXCEPTIONS:

1. ~~Drinking fountains for standing persons.~~
2. Drinking fountains primarily for children's use shall be permitted where ~~the spout outlet is 30 inches (760 mm) maximum above the floor,~~ a parallel approach complying with Section 305 is provided and the clear floor space is centered on the drinking fountain.

602.2.2 602.3 Operable Parts. Operable parts shall comply with Section 309.

602.2.3 602.4 Spout Outlet Height. Spout outlets of wheelchair accessible drinking fountains shall be 36 inches (915 mm) maximum above the floor. ~~Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the floor.~~

EXCEPTION: At drinking fountains primarily for children's use, the spout outlet shall be 30 inches (760 mm) maximum above the floor.

602.2.4 602.5 Spout Location. The spout shall be located 15 inches (380 mm) minimum from the vertical support and 5 inches (125 mm) maximum from the front edge of the drinking fountain, including bumpers.

EXCEPTION: ~~Where only a parallel approach is provided~~ At drinking fountains primarily for children's use, the spout shall be located 3 1/2 inches (89 mm) maximum from the front edge of the drinking fountain, including bumpers.

602.2.5 602.6 Water Flow. The spout shall provide a flow of water 4 inches (102 mm) minimum in height. The angle of the water stream from spouts within 3 inches (76 mm) of the front of the drinking fountain shall be 30 degrees maximum, and from spouts between 3 inches (76 mm) and 5 inches (125 mm) from the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

602.3 Drinking fountains for standing persons. Drinking fountains for standing persons shall comply with Section 602.3.1 through 602.3.4.

602.3.1 Operable Parts. Operable parts shall comply with Section 309.3 and 309.4.

602.3.2 Spout Outlet Height. Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the floor.

602.3.3 Spout location. The spout shall be located 5 inches (125 mm) maximum from the front edge of the drinking fountain, including bumpers.

602.3.4 Water Flow. The spout shall provide a flow of water 4 inches (102 mm) minimum in height. The angle of the water stream from spouts within 3 inches (76 mm) of the front of the drinking fountain shall be 30 degrees maximum, and from spouts between 3 inches (76 mm) and 5 inches (125 mm) from the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

Reason: The purpose is to reorganize the drinking fountain section to clearly differentiate between the requirements for wheelchair and standing drinking fountains. Since these are separate drinking fountains, they requirements for each need to be clear.

Since side approach is now only allowed for children (and is no longer permitted as an option for existing), that can also be clarified and made consistent. The current height for the spout outlet for children is listed as an exception under clear floor space. The revised text would deal with children's drinking fountains in the same manner under clear floor space, spout outlet, and spout location.

Question 2:

602.1 General. Accessible drinking fountains shall comply with Sections 602 and 307.

602.2 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward approach to the drinking fountain, shall be provided. Knee and toe space complying with Section 306 shall be provided. The clear floor space shall be centered on the drinking fountain.

EXCEPTIONS:

1. Drinking fountains for standing persons.
2. Wheelchair accessible drinking fountains primarily for children's use shall be permitted where the spout outlet is 30 inches (760 mm) maximum above the floor, a parallel approach complying with Section 305 is provided and the clear floor space is centered on the drinking fountain.

602.3 Operable Parts. Operable parts shall comply with Section 309.

602.4 Spout Outlet Height. Spout outlets of wheelchair accessible drinking fountains shall be 36 inches (915 mm) maximum above the floor. Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the floor.

EXCEPTION: Drinking fountains for standing persons and primarily for children's use shall be permitted where the spout outlet is 30 inches (760 mm) minimum and 43 inches (1090 mm) maximum above the floor.

602.5 Spout Location. The spout shall be located 15 inches (380 mm) minimum from the vertical support and 5 inches (125 mm) maximum from the front edge of the drinking fountain, including bumpers. Where only a parallel approach is provided, the spout shall be located 3¹/₂ inches (90 mm) maximum from the front edge of the drinking fountain, including bumpers.

602.6 Water Flow. The spout shall provide a flow of water 4 inches (100 mm) minimum in height. The angle of the water stream from spouts within 3 inches (75 mm) of the front of the drinking fountain shall be 30 degrees maximum, and from spouts between 3 inches (75 mm) and 5 inches (125 mm) from the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

Reason: The current text only allows for designing for children at the wheelchair drinking fountains. In facilities such as day care and primary schools, all the drinking fountains within certain areas are designed for the children. The drinking fountains (and bathrooms) for all teachers are in a different location. The exception would allow for both drinking fountains serving children to be designed for kids. If the drinking fountains serve adults, they cannot use this option for either the standing or wheelchair fountains. If this is not allowed, the children are too short to use the standing drinking fountain, so current text are discriminatory towards their height limits.

Background to 6-1-12

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

602.1 General. Wheelchair accessible drinking fountains shall comply with Sections 602.2 and 307. Drinking fountains for standing persons shall comply with Section 602.3 and 307.

602.2 Wheelchair accessible drinking fountains. Wheelchair accessible drinking fountains shall comply with Section 602.2.1 through 602.2.5.

602.2.2.1 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward approach to the drinking fountain, shall be provided. Knee and toe space complying with Section 306 shall be provided. The clear floor space shall be centered on the drinking fountain.

EXCEPTIONS:

- ~~1. Drinking fountains for standing persons.~~
2. Drinking fountains primarily for children's use shall be permitted where ~~the spout outlet is 30 inches (760 mm) maximum above the floor,~~ a parallel approach complying with Section 305 is provided and the clear floor space is centered on the drinking fountain.

~~**602.2.2.2.3 Operable Parts.** Operable parts shall comply with Section 309.~~

~~**602.2.3.4 Spout Outlet Height.** Spout outlets of wheelchair accessible drinking fountains shall be 36 inches (915 mm) maximum above the floor. Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the floor.~~

~~**EXCEPTION:** At drinking fountains primarily for children's use, the spout outlet shall be 30 inches (760 mm) maximum above the floor.~~

~~**602.2.4.5 Spout Location.** The spout shall be located 15 inches (380 mm) minimum from the vertical support and 5 inches (125 mm) maximum from the front edge of the drinking fountain, including bumpers.~~

~~**EXCEPTION:** Where only a parallel approach is provided At drinking fountains primarily for children's use, the spout shall be located 3¹/₂ inches (89 mm) maximum from the front edge of the drinking fountain, including bumpers.~~

~~**602.2.5.6 Water Flow.** The spout shall provide a flow of water 4 inches (102 mm) minimum in height. The angle of the water stream from spouts within 3 inches (76 mm) of the front of the drinking fountain shall be 30 degrees maximum, and from spouts between 3 inches (76 mm) and 5 inches (125 mm) from the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.~~

~~**602.3 Drinking fountains for standing persons.** Drinking fountains for standing persons shall comply with Section 602.3.1 through 602.3.4.~~

~~**602.3.1 Operable Parts.** Operable parts shall comply with Section 309.3 and 309.4.~~

~~**602.3.2 Spout Outlet Height.** Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the floor.~~

EXCEPTION: Drinking fountains for standing persons and primarily for children's use shall be permitted where the spout outlet is 30 inches (760 mm) minimum and 43 inches (1090 mm) maximum above the floor.

602.3.3 Spout location. The spout shall be located 5 inches (125 mm) maximum from the front edge of the drinking fountain, including bumpers.

602.3.4 Water Flow. The spout shall provide a flow of water 4 inches (102 mm) minimum in height. The angle of the water stream from spouts within 3 inches (76 mm) of the front of the drinking fountain shall be 30 degrees maximum, and from spouts between 3 inches (76 mm) and 5 inches (125 mm) from the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

The purpose of this proposal for drinking fountains is two-fold. 1) put criteria for children's drinking fountains under the specific requirements. 2) separate criteria for drinking fountains serving wheelchair users from those serving standing persons.

With the exception for children only being for wheelchair drinking fountains, literally standing drinking fountains in a preschool would have to be at an adult height, making them too high for the children they are intended to serve. Also, there are no technical criteria for standing drinking fountains for children. The adult standing requirements are too high for toddlers and pre-schoolers.

This separation of the criteria for wheelchair and standing fountains helps identify which pieces of the criteria are appropriate for each type. Ex: New Section 602.3.1 - Since a wheelchair clear floor space is not needed for access to the drinking fountain for standing persons, a wheelchair clear floor space should not be required for access to the controls through the reference to 309, which picks up a clear floor space under 309.2. (If a clear floor space is desired, it should be similar to that required for tactile signage.)

Are the spout location and water flow necessary for standing drinking fountains? For example, the location of the spout in relation to the back wall is only needed for knee clearance, not standing. Need input from the plumbing industry.

602.1-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: The Committee was not convinced that the proposal wasn't adding requirements for children who don't have disabilities. For example, why address standing children unless there is data which substantiates a need for children who may not be able to stoop and use a fountain.

BALLOT COMMENTS

6-1.1

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-1.2

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: Drinking fountains are for the occupants of the space. The current requirements place the standing drinking fountain outside of the children's reach. Therefore, the current text is discriminatory against children who are not tall enough to reach the standing drinking fountain.

6-1.3

Commenter Hope Reed, Representing NMGCD

Ballot: Negative with comment:

Comment: The separation of wheelchair drinking fountains and standing person's drinking fountains is useful for adults and children. Children who are ambulatory and using leg braces, walkers, or crutches will need a standing drinking fountain.

Proponent Comment

6-1.4

Commenter: Kim Paarlberg, Representing ICC

Request the proposal be Approved as Submitted:

Reason: The intent is to separate the requirements for drinking fountains serving wheelchairs from drinking fountains serving standing persons. This is similar to what we did for the different types of showers. This should help clarify. For example: 1) you don't need an exception for clearances at the standing drinking fountain. 2) the spout height for children's fountains is located with the spout height, not in an exception under clear floor space. 3) since only children's fountains can use side approach, the depth of the spout requirements are clearer.

There is also the question of the standing drinking fountain required in pre-schools and day care facilities. Where the drinking fountains are for kids (not for the teachers), they should be able to be located at a height to serve standing kids, the same as in adult situations. The height chosen is between the child's wheelchair and standing adult heights. If the committee disagrees with this, the only thing that needs to change is this proposal is the removal of the exception in Section 602.3.2.

The committee reason argued about children stooping. This is more to allow for children to be able to reach the drinking fountain. The standing drinking fountain is too high for most small children.

Committee Review of Comments and Action – July 2013

Disapproved.

Committee Reason: The committee considered the information provided by the comments and decided to take no action to change its original disapproval of this proposal. The committee was not persuaded that the proposed organization was substantially better for the users of the standard.

Ballot Results:

48 Number eligible to vote

39 Affirmative (Uphold the Committee Recommendation)

0 Negative (Disagree with the Committee Recommendation)

1 Abstain (from Voting) NFPA

8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

6-39- 12

Kim Paarlberg, proponent, asks for further consideration of Proposal 6-39-12.

Reason: The current Figure 607.2 is not literally consistent with the text. If the diagram can be revised by the editorial committee to be consistent with the current text, I would consider my comment resolved.

The length of the tub is not the tub and the seat as indicated in Figure 607.2(b). The overall dimension is correct.

Background to 6-39-12

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

607.2 Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches (760 mm) minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, the clearance shall extend the depth of the seat and 12 inches (305 mm) minimum beyond the wall at the head end of the bathtub.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

Section 607.4.1 sets the 'depth' of the seat. The current language skips the piece between the 'length of the tub' and the end of the extension. This is a technical issue that just gives you all the pieces. Please see graphic revision attached.

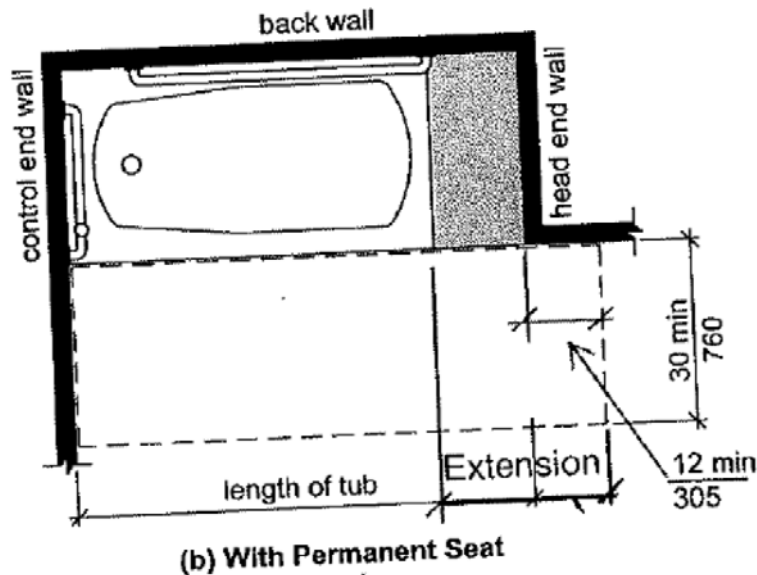


FIG. 607.2(b)
CLEARANCE FOR BATHTUBS

Committee Action

Disapproved

Committee Reason: The Committee believes that the current text is clear and no amendment is needed.

BALLOT COMMENTS

6-39.1

Commenter: Rick Lupton, Representing WABO
Ballot: Affirmative with comment:

Comment: The language is clear but not precise and I've found that imprecision leads to more questions and more mistakes. That said most use the graphics anyway –even though they're not really the Standard language.

6-39.2

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: The language needs to match Figure 607.2(b). The current text has a gap between the end of the tub and the space past the end wall.

Replace proposal as follows:

607.2 Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches (760 mm) minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, the clearance shall extend along the seat and an additional 12 inches (305 mm) minimum beyond the wall at the head end of the bathtub.

6-39.3

Commenter: Hope Reed, Representing NNGCD
Ballot: Negative with comment:

Comment: The permanent seat and extra 12" beyond needs better description.

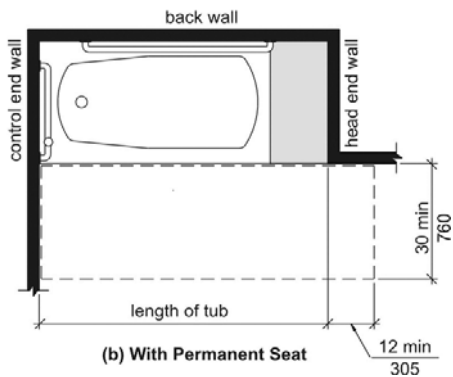
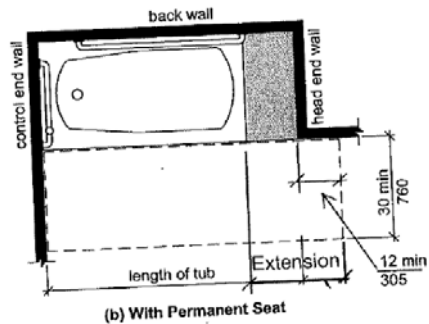
Proponent Comment

6-39.4

Commenter: Kim Paarlberg, Representing ICC

Replace the proposal with the following:

607.2 Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches (760 mm) minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, in addition to the length of the tub, the clearance shall extend the depth of the seat and 12 inches (305 mm) minimum beyond the wall at the head end of the bathtub.



Reason: The committee said the current language was clear, however, I sincerely believe they were looking at my corrected drawing, and not the existing Figure 607.2(b). See below. Definitely what is shown is not the length of the tub. If the language is clear, the drawing should be corrected – or both.

Committee Review of Comments and Action – July 2013

Disapproved.

Committee Reason: The committee considered the information provided by the comments and decided to take no action to change its original disapproval of this proposal. The committee concluded that the existing text is sufficiently clear and does not need to repeat the depth of the seat measurement. The clear floor space is measured from the wall regardless if there is a building in seat or not.

Ballot Results:

48 Number eligible to vote
 38 Affirmative (Uphold the Committee Recommendation)
 1 Affirmative with Comment - ICC
 0 Negative (Disagree with the Committee Recommendation)
 1 Abstain (from Voting) NFPA
 8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

ICC Kim Paarlberg

Affirmative with Comment Ballot:

Comment: It is my understanding that this issue with the figure will be addressed through the editorial committee.

6-61– 12

Hope Reed, proponent, asks for further consideration of Proposal 6-61-12.

Using the **Approved as Modified proposal 6-60** as the basis, see below further modifications from NMGCD in support of proposal **6-61.5 (Ambulatory Roll-in Showers)** and companion proposal for Grab Bars:

608.4 Controls and Hand Showers. Controls and hand showers shall comply with Section 608.4 and 309.4.

608.4.1 Transfer-Type Showers. In transfer-type showers, the controls and hand shower shall be located:

1. On the control wall opposite the seat,
2. At a height of 38 inches (965 mm) minimum and 48 inches (1220 mm) maximum above the shower floor, and
3. 15 inches (380 mm) maximum, from the centerline of the control wall toward the shower opening.

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:

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.

608.4.2.1 Ambulatory Roll-In Showers. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, an additional shower control and hand shower may be located on this side wall:

1. At a height of 38 inches (965 mm) minimum to 48 inches (1220 mm) maximum above the shower floor, and
2. 17 inches (430 mm) to 19 inches (485 mm) from the back wall.

608.4.3 Alternate Roll-in Showers. In alternate roll-in showers, the controls and hand shower shall be located:

1. At a height of 38 inches (965 mm) minimum and 48 inches (1220 mm) maximum above the shower floor, and
2. Where the controls and hand shower are located on the end wall adjacent to the seat, the controls and hand shower shall be 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the wall behind the seat wall, or
3. Where the controls and hand shower are located on the back wall opposite the seat, the controls and hand shower shall be located within 15 inches (380 mm) maximum from, the centerline of the seat toward the transfer space.

Companion proposal for Grab Bars:

608.3 Grab Bars.

608.3.2 Standard Roll-in Type Showers. Grab bar for standard roll-in showers shall comply with Section 608.3.2. In standard roll-in type showers, grab bars shall be provided

608.3.2.1 Horizontal Grab Bars. Horizontal grab bars shall be provided on the back wall beginning at the edge of the seat. The grab bars shall not be located above the seat. The back wall grab bar shall extend the length of the wall but shall not be required to exceed 48 inches (1220 mm) in length. Where a side wall is provided opposite the sea 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 but

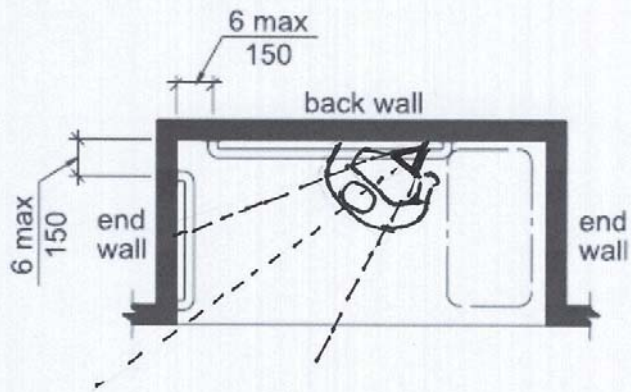
shall not be required to exceed 30 inches (760 mm) in length. Grab bars shall be 6 inches (150 mm) maximum from the adjacent wall.

608.3.2.1.1 Vertical Grab Bar. 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.

Reason: Many people with walking disabilities prefer to walk into the shower and stand while they shower. People with walking disabilities frequently have knee or hip problems that severely restrict their ability to easily sit and rise from a wet shower seat. The roll-in shower controls and spray located on the back wall are not easily usable by a person who prefers to stand and use the grab bars while showering because the water sprays out into the room and their elbows hit the back wall. Provide option for additional Ambulatory Roll-in Shower Controls and Hand Shower. See sketches at end.

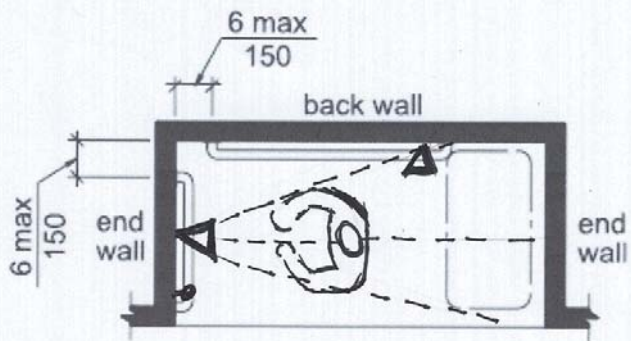
Four benefits of this proposal include:

1. Serve a greater number of people with disabilities in the Standard Roll-in Shower (those using wheelchairs and those who are walking impaired)
2. Add language for consistency in preventing installation of controls and hand showers above the seat in 608.4.2
3. Reformat a Standard Roll-in Shower and add new section for optional Ambulatory Roll-in Showers controls and hand showers in 608.4.2.1
4. Re-format Roll-in Showers horizontal grab bar, and add optional vertical grab bar for consistency in 608.3.2



Existing ANSI 608 Standard Roll-in Shower

- Half the spray goes out into the room.
- Person must stand as close as possible to spray and their elbows hit the back wall



Proposed Additional Ambulatory

- Controls and Hand Shower located on end wall I
- Vertical Grab Bar provided by standing entry

Background to 6-61-12

Proposed Change as Submitted

Proponent: Hope Reed, New Mexico Governor's Commission on Disability (NMGCD)

Revise as follows:

608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall be located on the back wall above the grab bar, 48 inches (1220 mm) maximum above the shower floor and 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the end wall behind the seat.

EXCEPTION: Additional controls and hand shower shall be permitted on the end wall opposite the seat wall of a standard roll-in shower.

Reason: The roll-in-type shower needs to be usable by able-bodied, ambulatory, and disabled individuals. Many people prefer the walk-in shower and grab bars to maintain a safe balance. Most able-bodied people and many ambulatory people prefer to stand when showering. Requiring the hand shower to be installed on the back wall makes it more difficult to contain water within the shower area.

The additional hand shower will allow more flexibility and usability for a greater number of people.

608.5 -REED.doc

Committee Action

Disapproved

Committee Reason: Similar to Proposal 6-60-12, this proposal is trying to regulate shower heads above the one head required to be accessible.

BALLOT COMMENTS

6-61.1

Commenter: Rick Lupton, Representing WABO

Ballot: Affirmative with comment:

Comment: The committee's comment should refer to Proposal 6-60-12.

6-61.2

Commenter: Gene Boecker, Representing NATO

Ballot: Negative with comment:

Comment: Delete the exception and change the initial sentence of the section to read as follows:

608.4.2 Standard Roll-in Showers. In addition to other controls and shower spray units which may be provided, in standard roll-in showers, the controls for the hand shower and the hand shower unit shall be located. . .

Revise as follows:

The proposal seeks to focus on the manner in which this section is often misinterpreted as limiting the shower controls and shower spray unit to only that which is addressed in the standard. The revised text makes it clear that other controls and shower spray units are allowed - as the committee indicated - as long as these items are provided in the locations indicated. Note that this could also be included for other types of showers but it is in the roll-in shower where the condition most often occurs.

6-61.3

Commenter: Barbara Huelet, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

6-61.4

Commenter: Hope Reed, Representing NMGCD
Ballot: Negative with comment:

Comment: In the roll-in shower provide an exception for an additional shower head, opposite the fixed seat. Standing ambulatory people need this shower head and this location allows a longer spray to stay within the shower.

Proponent Comment

6-61.5

Commenter: Hope Reed, Representing NMGCD

Revise the proposal as follows:

608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall comply with 608.4.2.

608.4.2.1 Roll-in Shower Controls and Hand Showers at Seat. In standard roll-in showers, the control and hand shower shall be located:

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

608.4.2.2 Roll-in Shower Controls and Hand Showers for Ambulatory. In standard roll-in showers a second ambulatory shower control and hand shower shall be located:

1. On the end wall opposite the seat.
2. At a height of 38 in. min. to 48 in. maximum above the shower floor.
3. 15 in. maximum from the centerline of the control wall toward the shower opening.

Reason: The roll-in-type shower needs to be usable by ambulatory and semi-ambulatory people, disabled individuals, and an able-bodied spouse or assistant. Many people with walking disabilities prefer the walk-in shower and grab bars to maintain a safe balance. Many of these ambulatory people prefer to stand when showering. Requiring the hand shower on the back wall makes it more difficult to contain water within the shower area.

The additional controls and hand shower on the end wall opposite the seat will allow more flexibility and usability for a greater range of people with disabilities.

See companion revision to #6-65 section 608.5 Hand Showers.

Committee Review of Comments and Action – July 2013

Disapproved.

Committee Reason: The committee aggressively discussed various comments to address providing reasonable accessible shower heads and controls. The committee considered the information provided by the comments and decided to take no action to change its original disapproval of this proposal.

Ballot Results:

48 Number eligible to vote
38 Affirmative (Uphold the Committee Recommendation)
1 Negative (Disagree with the Committee Recommendation) NMGCD
1 Abstain (from Voting) NFPA
8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

NMGCD – Hope Reed

Negative Ballot:

Comment/reason: Provide three beneficial changes:

1. Provide a different standard for people with disabilities who use wheelchairs from those who are ambulatory.
2. Identify where an ambulatory shower wand and control may be located, and
3. Provide a vertical grab bar for persons with disabilities who are ambulatory.

Many people with walking disabilities prefer the walk-in shower and grab bars to maintain safe balance. Many of these ambulatory people prefer to stand when showering. To stand and shower means you must angle the spray head at 30-45 degrees to the back wall. This is very uncomfortable because your elbows hit the back wall, and you must constantly re-adjust your footing to keep under the spray and avoid splashing water out into the room. Providing an ambulatory shower wand, controls, and vertical grab bar on the end wall, opposite the seat, will allow more flexibility and usability for a greater range of people with disabilities who are ambulatory. A horizontal grab bar is already required on the end wall in the Standard Roll-in-Type shower and the addition of a vertical grab bar would be beneficial here.

Revise the proposal as follows:

608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall comply with 608.4.2.

608.4.2.1 Wheelchair Accessible Roll-in Shower Controls and Hand Showers at Seat. In standard roll-in showers, the control and hand shower shall be located:

1. On the back wall above the grab bar,
2. 48 inches (1220 mm) maximum above the shower floor, and
3. 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the end wall behind the seat.

608.4.2.2 Ambulatory Roll-in Shower Controls and Hand Showers at End Wall. Where provided in a shower complying with 608.4.2.1, an ambulatory shower control and hand shower shall be installed and located:

1. On the end wall opposite the seat.
2. At a height of 38 inches (965 mm) minimum to 48 inches (1220 mm) maximum above the shower floor.
3. 15 inches (380 mm) maximum from the centerline of the control wall toward the shower opening.

608.4.2.2.1 Vertical Grab Bar. A vertical grab bar 18 inches (45 mm) minimum in length shall be provided on the control 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.

See companion revision to #6-65-12 Section 608.5 Hand Showers.

10-19– 12

Kim Paarlberg, proponent, asks for further consideration of Proposal 10-19-12.

Split the question to address public showers and each type of unit separately.

Question 1:

607.7 Bathtub Enclosures. ~~Enclosures for bathtubs shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto bathtub seats or into bathtubs. Enclosures on bathtubs shall not have tracks installed on the rim of the bathtub. Fixed panels, sliding panels and swinging panel assemblies for tub enclosure shall not be permitted on the access side of the bath tub.~~

608.7 Shower Enclosures. Fixed panels, sliding panels and swinging panel assemblies for shower enclosure shall not be permitted on the access side of the shower.

Exception: Panels for Shower compartment enclosures for shall be permitted where all of the following are met:

1. Panels shower compartments shall not obstruct controls or obstruct transfer from wheelchairs onto shower seats.
2. At least one sliding or swinging panel shall provide a minimum clear width of 32"

Question 2:

1003.11.2.5.1 Bathtub. Bathtubs shall comply with Section 607.

EXCEPTIONS:

1. The removable in-tub seat required by Section 607.3 is not required.
2. Counter tops and cabinetry shall be permitted at one end of the clearance, provided the following criteria are met:
 - a) The countertop and cabinetry can be removed;
 - b) The floor finish extends under the countertop and cabinetry; and
 - c) The walls behind and surrounding the countertop and cabinetry are finished.
3. A panel assembly for tub enclosure shall be permitted at the bathtub entry where the panel assembly can be removed without removal or replacement of the surrounding walls and tub edge to which it is affixed.

1003.11.2.5.2 Shower. Showers shall comply with Section 608.

EXCEPTIONS:

1. At standard roll-in shower compartments complying with Section 608.2.2, lavatories, counter tops and cabinetry shall be permitted at one end of the clearance, provided the following criteria are met:
 - a) The countertop and cabinetry can be removed;
 - b) The floor finish extends under the countertop and cabinetry; and
 - c) The walls behind and surrounding the countertop and cabinetry are finished.
2. A panel assembly for shower enclosure shall be permitted at the shower entry where the panel assembly can be removed without removal or replacement of the surrounding walls and floor to which it is affixed.

Question 3:

1004.11.3.1.3 Bathing Fixtures. Where provided, a bathtub shall comply with Section 1004.11.3.1.3.1 or 1004.11.3.1.3.2 and a shower compartment shall comply with Section 1004.11.3.1.3.3. . A panel assembly for tub enclosure shall be permitted at the bathtub entry.

1004.11.3.1.3.3 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. Reinforcing for a shower seat is not required in shower compartments larger than 36 inches (915 mm) in width and 36 inches (915 mm) in depth. A panel assembly for shower enclosure shall be permitted at the shower entry.

Reason: While enclosures are addressed for bathtubs and showers in the current text, the enclosures are not the same as the door to the shower. The enclosure can be all four walls. A shower stall enclosure on the approach side is not the same as a door addressed in Section 404 – therefore, this section should not be referenced for requirements. The desired requirements for access to a shower and tub needs to be clearly expressed in the standard.

I do not see how a sliding or swinging door on the front of a minimum size shower or a standard tub could meet the current limitations for not obstructing access to the controls or to transfer.

The two types of doors are swinging and sliding. The following is the best information I was able to find on a computer search. Better answers may come from the plumbing industry representatives.

Sliding move in two directions, so it can be shifted to either side to allow access to the controls or access to the seat . Can I assume that meets the current enclosure requirements? With a sliding door, the maximum overall width is 60" wide. Door width on a 36" stall is 16" maximum. Door width on a 60" stall size is 28" maximum.

Swinging shower doors still need space for hinges. In a 36" stall, the door width is 30" with the standard frame. The doors can come 22" to 36" wide with side panels for a 60" shower.

For public showers and Accessible units – With roll-in showers required to have a seat, the controls have moved to the back. With a minimum size stall, can a swinging door of 32" clear at the seat end provide adequate clearance? Would any sliding door work? I don't see how the minimum size shower would ever meet the enclosure requirements, so we might as well start out saying they are prohibited. If someone wants to provide a larger shower with a door, then they can use the exception, which includes the current text requiring access to controls and the seat.

For Type A dwelling units – a common complaint is the water from the shower going onto the floor of the bathroom. The ½" threshold is not adequate to hold the water in the pan. That is being addressed with the new style trench drains, but should we prohibit Type A units from having tub or shower enclosures? Since a Type A units is expected to have some features 'adaptable' the exception would allow for someone that did not need the full entry opening to have a shower door as long as it was removable. This would be consistent with the allowance for removable cabinetry in Type A units.

For Type B dwelling units – FHA allows for shower doors on their showers with no limitations. This should be permitted for consistency. Also, for showers, many renters and owners prefer a door to a shower curtain.

Background to 10-19-12

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

1003.11.2.5.2 Shower. Showers shall comply with Section 608.

EXCEPTIONS:

1. At standard roll-in shower compartments complying with Section 608.2.2, lavatories, counter tops and cabinetry shall be permitted at one end of the clearance, provided the following criteria are met:

- a) The countertop and cabinetry can be removed;
 - b) The floor finish extends under the countertop and cabinetry; and
 - c) The walls behind and surrounding the countertop and cabinetry are finished.
2. A shower door shall be permitted where the door can be removed without replacement or repair of tile or other finish on the wall or floor.

1004.11.3.1.3.3 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. Reinforcing for a shower seat is not required in shower compartments larger than 36 inches (915 mm) in width and 36 inches (915 mm) in depth.

EXCEPTION: A shower door shall be permitted where the door can be removed without replacement or repair of tile or other finish on the wall or floor.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

This allows for the type of shower door that can be attached in such a way that it is removable. Not everyone wants only the option of a shower curtain. Glass doors on the market cannot provide space for a transfer when in place.

1003.11.2.5.2-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: The Committee lacked sufficient consensus to approve this proposal. The concerns included whether replacing or repairing tiles should be the key criteria. It was noted such installations have been allowed under the Fair Housing provisions. While the proposals was amended to address 'shower door assemblies' rather than just the door, there remained too many concerns.

BALLOT COMMENTS

10-19.1

Commenter: Gene Boecker, Representing NATO

Ballot: Negative with comment:

Comment: Replace the exception language with the following:

Revise as follows:

A shower door assembly shall be permitted where the assembly can be removed without removal or replacement of the surrounding walls and floor to which it is affixed.

This borrows the same language from the removable base cabinets and avoids the word "repair" since all surfaces would need some type of treatment (e.g. paint, caulk, etc.). It also limits this application of this to the place where the shower door assembly is affixed whether by sealant, screws or a combination thereof.

10-19.2

Commenter: Dominic Marinelli, Representing USA

Ballot: Negative with comment:

Comment: Kim's proposal is essential for our Type A and Type B units. Whether we permit this or not many developers install shower doors to prevent the water from getting on the bathroom floor and this proposal codifies this practice.

10-19.3

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: In looking at the option of allowing for doors on showers in Type A and Type B bathrooms, I have noticed that this issue is not addressed for accessible showers, but is addressed for accessible bathtubs. The issue of doors on showers or tubs should be addressed in all situations.

Type A units are adaptable. Therefore, there should be an allowance for shower doors to be removed, the same as adding grab bars. If FHA intended to allow for shower doors in all situations (as indicated by Cheryl Kent at the last meeting), that should also be included in the ICC A117.1 text.

Replace the proposal with the following:

(Bathtubs) 607.7 Bathtub Enclosures. Enclosures for bathtubs shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto bathtub seats or into bathtubs. Enclosures on bathtubs shall not have tracks installed on the rim of the bathtub.

(Transfer shower) 608.2.1.4 Shower enclosure. Enclosures for transfer showers shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto the shower seat or into the transfer shower. Enclosures on transfer showers shall not have tracks installed on the threshold of the transfer shower.

(Roll-in shower) 608.2.2.4 Shower enclosure. Enclosures for roll-in showers shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto the shower seat or into the roll-in shower. Enclosures on roll-in showers shall not have tracks installed on the threshold of the transfer shower.

(Alternate roll-in shower) 608.2.3.3 Shower enclosure. Enclosures for alternate roll-in showers shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto the shower seat or into the alternate roll-in shower. Enclosures on alternate roll-in showers shall not have tracks installed on the threshold of the transfer shower.

1003.11.2.5.2 Shower. Showers shall comply with Section 608.

EXCEPTIONS:

1. At standard roll-in shower compartments complying with Section 608.2.2, lavatories, counter tops and cabinetry shall be permitted at one end of the clearance, provided the following criteria are met:
 - d) The countertop and cabinetry can be removed;
 - e) The floor finish extends under the countertop and cabinetry; and
 - f) The walls behind and surrounding the countertop and cabinetry are finished.
2. An enclosure for a shower shall be permitted where the shower door assembly can be removed without removal or replacement of the surrounding walls and floor to which it is affixed.

1004.11.3.1.3.3 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. Reinforcing for a shower seat is not required in shower compartments larger than 36 inches (915 mm) in width and 36 inches (915 mm) in depth. A shower door assembly shall be permitted at the shower entry.

PROPONENT COMMENT

10-19.4

Proponent: Kim Paarlberg, Representing ICC

Requests approval with revisions

Replace the proposal with the following:

(Bathtubs) 607.7 Bathtub Enclosures. Enclosures for bathtubs shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto bathtub seats or into bathtubs. Enclosures on bathtubs shall not have tracks installed on the rim of the bathtub.

(Transfer shower) 608.2.1.4 Shower enclosure. Enclosures for transfer showers shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto the shower seat or into the transfer shower. Enclosures on transfer showers shall not have tracks installed on the threshold of the transfer shower.

(Roll-in shower) 608.2.2.4 Shower enclosure. Enclosures for roll-in showers shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto the shower seat or into the roll-in shower. Enclosures on roll-in showers shall not have tracks installed on the threshold of the transfer shower.

(Alternate roll-in shower) 608.2.3.3 Shower enclosure. Enclosures for alternate roll-in showers shall not obstruct controls, faucets, shower and spray units or obstruct transfer from wheelchairs onto the shower seat or into the alternate roll-in shower. Enclosures on alternate roll-in showers shall not have tracks installed on the threshold of the transfer shower.

1003.11.2.5.2 Shower. Showers shall comply with Section 608.

EXCEPTIONS:

2. At standard roll-in shower compartments complying with Section 608.2.2, lavatories, counter tops and cabinetry shall be permitted at one end of the clearance, provided the following criteria are met:
 - g) The countertop and cabinetry can be removed;
 - h) The floor finish extends under the countertop and cabinetry; and
 - i) The walls behind and surrounding the countertop and cabinetry are finished.
2. An enclosure for a shower shall be permitted where the shower door assembly can be removed without removal or replacement of the surrounding walls and floor to which it is affixed.

1004.11.3.1.3.3 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. Reinforcing for a shower seat is not required in shower compartments larger than 36 inches (915 mm) in width and 36 inches (915 mm) in depth. A shower door assembly shall be permitted at the shower entry.

Reason: In looking at the option of allowing for doors on showers in Type A and Type B bathrooms, I have noticed that this issue is not addressed for accessible showers, but is addressed for accessible bathtubs. The issue of doors on showers or tubs should be addressed in all situations.

Type A units are adaptable. Therefore, there should be an allowance for shower doors to be removed, the same as adding grab bars. If FHA intended to allow for shower doors in all situations (as indicated by Cheryl Kent at the last meeting), that should also be included in the ICC A117.1 text.

Committee Review of Comments and Action – July 2013

Disapproved.

Committee Reason: The committee considered various options to improve on the proposal based on comments. A consensus was not developed around any of the proposed amendments. As the standard is silent on enclosures other than bathtubs, many on the committee felt the installations were not prohibited.

Ballot Results:

48 Number eligible to vote
38 Affirmative (Uphold the Committee Recommendation)
1 Negative (Disagree with the Committee Recommendation) NATO
1 Abstain (from Voting) NFPA
8 Not Returned by Deadline – AHLA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

Ballot Results following Recirculation – October 15, 2013:

48 Number eligible to vote
36 Affirmative (Uphold the Committee Recommendation)

3 Negative (Disagree with the Committee Recommendation) NATO, AIA, ICC
1 Abstain (from Voting) NFPA
8 Not Returned by Deadline – AHFA, ASID, ASPE, ASSE, BOMA, MCDPS, NAD, USDA

NATO – Gene Boecker

Negative Ballot:

Comment/reason: This not uniformly understood. Nor is it applied consistently where a shower door is allowed. While the committee may believe that the standard as written does not prohibit shower door assemblies, there are many in the enforcement area who do not think that way. Shower door assemblies are regularly noted as violations in many jurisdictions because it is left up to the local entity to interpret what is required since the standard is silent on the topic. Because enclosures are specifically addressed for bathtubs but are not mentioned for showers, it is assumed that shower doors are prohibited. At a minim, keep the issue open by allowing language similar to what was proposed previously:

1003.11.2.5.2

(unchanged)

2. A shower door assembly shall be permitted where the assembly can be removed without removal or replacement of the surrounding walls and floor to which it is affixed.

And

1004.11.3.1.3.3 Shower Compartment

(unchanged)

EXCEPTION: A shower door assembly shall be permitted where the assembly can be removed without removal or replacement of the surrounding walls and floor to which it is affixed.

AIA – Dave Collins

Negative Ballot

Comment/reason: I agree with NATO-Gene Boecker's comment.

ICC – Kim Paarlberg

Negative Ballot

Comment/reason: I agree with NATO-Gene Boecker's comment. Current understanding is that shower doors, if provided, must meet all the door provisions. Asking for clear width and maneuvering clearances is not feasible given the size of the shower and available products.