## Proposal list to the 2017 A117.1 for the 2023 edition – first draft comments

### Chapter 1

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EDITORIAL PROPOSALS FROM THE TERMINOLOGY COMMITTEE

Staff Note: The 5 editorial proposals show the approved legislative text. Change numbers are indicated over the revised sections. The red text with strike-out/underline are proposed revisions. Red text may also indicate existing text that is marked to illustrate consistency throughout the standard. If an editorial proposal affected text in new language, this is also indicated as public comments at that proposal to allow for a complete record for each proposal. If the committee agrees with these editorial items, those public comments will also be approve.

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

E-01 – 2023 Public Comment - Editorial
307.4, 404.2.2, 602.2.5, 602.3.4, 608.2.2.3

Proponent: Marsha Mazz, representing Terminology work group

Further revise as follows:

SECTION 307
PROTRUDING OBJECTS

03-09-2021 AM

307.4 Vertical clearance. Vertical clearance shall be 80 inches (2030 mm) **high** minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm) **high**. The leading edge of such rails or barrier shall be located **between** 10 inches (255 mm) **minimum** and 27 inches (685 mm) **maximum** above the floor.

**Exception:** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.
404.2.2 Clear width. Doorways shall have a clear opening width of 32 inches (815 mm) minimum. Clear opening width of doorways with swinging doors shall be measured between the face of door and stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) in depth at doors and doorways without doors shall provide a clear opening width of 36 inches (915 mm) minimum. There shall be no projections into the clear opening width lower than 34 inches (865 mm) above the floor. Projections into the clear opening width between 34 inches (865 mm) minimum and 80 inches (2030 mm) maximum into the clear opening width above the floor shall not exceed 4 inches (100 mm).

Exceptions:
1. Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.
2. In alterations, a projection of 5/8 inch (16 mm) maximum into the required clear opening width shall be permitted for the latch side stop.

602.2.5 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) minimum and 5 inches (125 mm) maximum from spouts to the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

602.3.4 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) minimum and 5 inches (125 mm) maximum from spouts to the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

06-61-21 AM

608.2.2.3 Seat. An seat complying with Section 610 shall be provided that can be secured at varying distances from the control wall. At least one of the positions will locate the back of the seat between 35 inches (889 mm) minimum and 37 inches (889 and 940 mm) maximum from the control wall.

Exception: A seat is not required to be installed in a shower for a single occupant accessed only through a private office and not for common use or public use, provided reinforcement has been installed in walls and located so as to permit the installation of a shower seat.

REASON: This is part of the proposals from the Terminology Work Group. It is assumed that this will be referred to the Editorial committee if the A117.1 committee agrees with the concept. See comments to 03-09 and 06-61 for parts related to new text.

Between is not clear as to if the end points are included or not.
Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

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Further revise as follows:

SECTION 1001
GENERAL

1001.1 Scope. Recreational facilities required to be accessible by the scoping provisions adopted by the administrative authority shall comply with the applicable provisions of Chapter 10.

1001.2 Special provisions.

1001.2.1 General exceptions. The following shall not be required to comply with this standard or to be on an accessible route:
1. Raised structures used solely for refereeing, judging, or scoring a sport.
2. Water slides.
3. Animal containment areas that are not for public use.
4. Raised boxing or wrestling rings.
5. Raised diving boards and diving platforms.
6. Bowling lanes that are not required to provide wheelchair spaces in the associated team or player seating.
7. Mobile or portable amusement rides
8. Amusement rides that are controlled or operated by the rider.
9. Amusement rides designed primarily for children, where children are assisted on and off the ride by an adult.
10. Amusement rides that do not provide amusement ride seats.
11. Shooting facilities with firing positions on free-standing platforms that are elevated above grade 12 feet (3660 mm) minimum provided that the aggregate area of elevated firing positions is 500 square feet (46 m²) maximum.

(Amusement rides)
1002.4.4. Clearances - Wheelchair spaces. Clearances for wheelchair spaces for amusement rides shall comply with Section 1002.4.4.

Exceptions:
1. Where provided, securement devices shall be permitted to overlap required clearances wheelchair space.
2. Wheelchair spaces shall be permitted to be mechanically or manually repositioned.
3. Wheelchair spaces shall not be required to comply with Section 307.4.

1002.4.4.2 Side entry. Where wheelchair spaces are entered only from the side, amusement rides shall be designed to permit sufficient maneuvering clearance for individuals using a wheelchair or mobility aid device to enter and exit the ride.
1002.5.3 Transfer entry. Where openings are provided for transfer to amusement ride seats, the openings shall provide clearance for transfer from a wheelchair or mobility aid device to the amusement ride seat.

**REASON:** This is part of the proposals from the Terminology Work Group. It is assumed that this will be referred to the Editorial committee if the A117.1 committee agrees with the concept. This is an attempt to use the defined term for wheelchair space and wheelchair space location consistently. The current text is inconsistent in use of the terms. “Device” is consistent with the definition change for wheelchair space and wheelchair space in 01-06-21.

**01-06-2021 AM**

**wheelchair space:** A space for a single wheelchair or other mobility device and its occupant user.

**01-06-2021 AM**

**wheelchair space locations:** A space for a minimum of a single wheelchair or other mobility device and the associated companion seating. Wheelchair space locations can contain multiple wheelchair spaces and associated companion seating.

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**Committee Action for First Ballot:**

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:**

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**Report for E-02-2023**

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Multiple

Note: Highlighted text is successful proposals. Only underline/strike out are proposed changes. Some red text is existing building block terms.

Proponent: Marsha Mazz, representing Terminology work group

107.5 Defined terms.

**Clear floor space:** The minimum space to accommodate one person using a wheelchair or other mobility device (see Section 305 for other than Type B units, or Section 1104.1.1 for Type B units).

**Knee and toe clearance:** The volume of open space required under an element to provide sufficient room for a person using a wheelchair to position or maneuver beneath the element. (Section 306)

**Maneuvering clearance:** Minimum space for a person using a wheelchair or other mobility device to access an accessible element.

**Operable part:** A component of an element used to insert or withdraw objects, or to activate, deactivate, control or adjust the element (see Section 309).

**Reach ranges:** The limits for a forward or side reach to an element by a person using a wheelchair or other mobility device (see Section 308).

**Turning space:** A space for a person using a wheelchair or other mobility device to turn around (See Section 304).

**Wheelchair charging area:** A clear floor area space where people with disabilities can recharge their batteries for wheelchairs or other mobility devices.

SECTION 301
GENERAL

**301.2 Overlap.** Unless otherwise specified, clear floor spaces, maneuvering clearances at fixtures an element, maneuvering clearances at doors, and turning spaces shall be permitted to overlap.

SECTION 305
CLEAR FLOOR SPACE

**305.7 Alcoves.** If a clear floor space is in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearances complying with Sections 305.7.1 and 305.7.2 shall be provided in the alcove, as applicable.
305.7.1 Parallel approach. Where a clear floor space is positioned for a parallel approach, the maneuvering clearance in the alcove shall be 60 inches (1525 mm) minimum in width where the depth exceeds 15 inches (380 mm).

Figure 305.7.1
MANEUVERING CLEARANCE IN AN ACOVE
PARALLEL APPROACH

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

Figure 305.7.2
MANEUVERING CLEARANCE IN AN ACOVE
FORWARD APPROACH

SECTION 306
KNEE AND TOE CLEARANCE

306.1 General. Where space beneath an element is included as part of the clear floor space at an element, maneuvering clearance at an element, or a turning space, the space shall comply with Section 306. Additional space shall not be prohibited beneath an element, but shall not be considered as part of the clear floor space or turning space.

SECTION 307
PROTRUDING OBJECTS

03-09-2021 AM

307.4 Vertical Headroom clearance. Vertical Headroom clearance shall be 80 inches (2030 mm) high minimum. Rails or other barriers shall be provided where the vertical headroom clearance is less than 80 inches (2030 mm) high. The leading edge of such rails or barrier shall be located between 10 inches (255 mm) and 27 inches (685 mm) above the floor.

Exception: Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

Figure 307.4
REDUCED VERTICAL HEADROOM CLEARANCE

SECTION 308
REACH RANGES

308.1 General. Reach ranges shall comply with Section 308.

308.2 Forward reach. Forward reach shall comply with Section 308.2.

308.3 Side reach. Side reach shall comply with Section 308.3.
SECTION 309 OPERABLE PARTS

03-16-2021 AM

309.3 Height. Operable All portions of operable parts required for use or operation shall be placed located within one or more of the applicable reach ranges specified in Section 308.

SECTION 403
WALKING SURFACES

403.5.4 Passing space.

403.5.4.1 New buildings and facilities. In new buildings and facilities, an accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2.1, provided the base and arms of the T-shaped space extend 52 inches (1320 mm) minimum beyond the intersection.

403.5.4.2 Existing buildings and facilities. In existing buildings and facilities, an accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2, provided the base and arms of the T-shaped space extend 48 inches (1220 mm) minimum beyond the intersection.

SECTION 405
RAMPS

405.7.5 Doorways. Where a door or gate is adjacent to a ramp landing, maneuvering clearances required by Sections 404.2.3 and 404.3.4 shall be permitted to overlap the landing area. Where a door or gate that is subject to locking is located adjacent to a ramp landing, the landing shall be sized to provide a turning space complying with Section 304.3.

SECTION 502
PARKING SPACES

502.6 Vertical Vehicle clearance. A vertical vehicle clearance of 98 inches (2490 mm) high minimum shall be provided at the following locations:

1. Parking spaces for vans.
2. The access aisles serving parking spaces for vans.
3. The vehicular routes serving parking spaces for vans.

502.10 Parking meters and parking pay stations. Parking meters and parking pay stations that serve parking spaces shall comply with Section 309 operable parts.
SECTION 504  
PASSSENGER LOADING ZONES  

504.5 Vertical Vehicle clearance. A vertical vehicle clearance of 114 inches (2895 mm) minimum shall be provided at the following locations:

1. Vehicle pull-up spaces;
2. The access aisles serving vehicle pull-up spaces;
3. A vehicular route from an entrance to the passenger loading zone, and;
4. A vehicular route from the passenger loading zone to a vehicular exit serving vehicle pull-up spaces.

SECTION 507  
WINDOWS  

507.2 Operating force. The operating force for windows includes forces for opening, closing, locking or latching, and unlocking or unlatching and shall be determined in accordance with AAMA 513 listed in Section 106.2.12. Operable parts Window hardware for locking or latching and unlocking or unlatching shall comply with Section 309 operable parts. The operating force for opening and closing operable windows shall be as follows:

1. 8.5 pounds (37.7 N) maximum for vertical or horizontal sliding windows.
2. 5 pounds (22.2N) maximum for all other types of operating windows.

SECTION 602  
DRINKING FOUNTAINS AND BOTTLE FILLING STATIONS  

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

Exception: Drinking fountains primarily for children’s use shall be permitted where a clear floor space provides a parallel approach and is centered on the drinking fountain.

602.2.2 Operable parts. Operable parts Controls for drinking fountains for persons using wheelchairs shall comply with Section 309 operable parts.

602.3 Drinking fountains for persons who are standing. Drinking fountains for persons who are standing shall comply with Sections 602.3.1 through 602.3.4.

602.3.1 Operable parts. Operable parts Controls for drinking fountains for persons who are standing shall comply with Sections 309.3 and 309.4.

06-01-2021 AS  

602.4.1 Clear floor space. A clear floor space complying with Section 305 positioned for a forward or side approach shall be provided.
602.4.2 Controls. Controls for bottle filling stations shall be hand operated or automatic. Hand operated controls shall comply with Section 309 operable parts. Automatic controls shall allow for bottle filling operation within the height operable parts requirements of Section 309.3.

SECTION 603
TOILET AND BATHING ROOMS

603.1 General. Toilet and bathing rooms shall comply with Section 603.

603.2 Clearances Toilet and Bathing room configurations. The configuration of the toilet or bathing room shall comply with 603.2.

603.2.1 Turning space. A turning space shall be provided within the room. The required turning space shall not be provided within a toilet compartment.

6-90-2021 AM

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

Exceptions:

1. Doors to a toilet or bathing room for a single occupant, accessed only through a private office and not for common use or public use shall be permitted to swing into the clear floor space, provided the swing of the door can be reversed to comply with Section 603.2.2.

2. Where the room is intended for individual use, family or assisted-use, and a clear floor space complying with Section 305.3 is provided within the room outside the arc of a door swing, such a door shall not be required to comply with 603.2.2.

603.4 Coat hooks and shelves. Coat hooks shall be located within one of the applicable reach ranges specified in Section 308. Shelves shall be 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the floor.

603.6 Operable parts Controls. Operable parts Controls on towel dispensers and hand dryers serving lavatories complying with Section 606 shall comply with Table 603.6.

06-10-2021 AS

603.7 Dispensers for Accessories. Where provided, at least one of each type of dispenser for accessories shall be located on an accessible route and the comply with operable parts of the dispenser shall comply with Section 309.

SECTION 604
WATER CLOSETS AND TOILET COMPARTMENTS

604.3 Maneuvering Clearance.

Figure 604.3
604.3.1 Maneuvering Clearance width. Maneuvering Clearance around a water closet shall be 60 inches (1525 mm) minimum in width, measured perpendicular from the sidewall.

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

604.3.3 Maneuvering Clearance overlap. The required maneuvering clearance around the water closet shall be permitted to overlap the water closet, associated grab bars, accessible routes, clear floor space at other fixtures and the turning space. In addition, paper dispensers, trash receptacles, coat hooks, and open or closed shelves, medical and security alert devices shall be permitted to overlap 6 inches (150 mm) maximum into the water closet maneuvering clearance around the water closet. No other fixtures or obstructions shall be located within the required water closet maneuvering clearance around the water closets.

604.9.3 Doors. Doors for wheelchair accessible toilet compartments shall comply with Sections 404.2.2, 404.2.3.2, 404.2.4 and 404.2.9. The door shall be self-closing with a balanced door or spring hinges. Door hardware shall comply with Section 404.2.6. In addition a door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Wheelchair accessible toilet compartment doors shall not swing into the required minimum area of the compartment.

Exceptions:

1. Outside of the compartment, the door is not required to comply with Section 404.2.3.2 where the approach is to the latch side of the wheelchair accessible toilet compartment, door and the clearance between the door side of the compartment and any obstruction 42 inches (1065 mm) minimum.

2. Within the wheelchair accessible toilet compartment, maneuvering clearances at the door shall not be required to comply with Section 404.2.3.2.

3. In an alternate wheelchair accessible toilet compartment, complying with Section 604.9.2.3, a door located in the front wall or partition shall be permitted to swing into the stall compartment where the minimum depth of the stall is 90 inches (2286 mm).

604.9.5.1 Toe clearance at wheelchair accessible toilet compartments and alternate wheelchair accessible toilet compartments. The front partition and at least one side partition of wheelchair accessible toilet compartments and alternate wheelchair accessible toilet compartments shall provide a toe clearance of 12 inches (305 mm) minimum above the floor and extending 8 inches (205 mm) beyond the compartment side face of the partition, exclusive of partition support members.

Exceptions:
1. Toe clearance at the front partition is not required in a wheelchair accessible toilet compartment or alternate wheelchair accessible toilet compartments greater than 64 inches (1625 mm) in depth with a wall-hung water closet, or greater than 67 inches (1700 mm) in depth with a floor-mounted water closet.

2. Toe clearance at the side partition is not required in a wheelchair accessible toilet compartment or alternate wheelchair accessible toilet compartments greater than 68 inches (1725 mm) in width.

3. Toe clearance is not required in a wheelchair accessible compartment that includes a turning space complying with Section 304.

06-27-2021 AS

604.9.5.2 Toe clearance at wheelchair accessible toilet compartments for children’s use. The front partition and at least one side partition of wheelchair accessible toilet compartments primarily for children’s use shall provide a toe clearance of 12 inches (305 mm) minimum above the floor and extending 8 inches (205 mm) beyond the wheelchair accessible toilet compartment side face of the partition, exclusive of partition support members.

Exceptions:

1. Toe clearance at the front partition is not required in a wheelchair accessible toilet compartment greater than 67 inches (1700 mm) in depth.

2. Toe clearance at the side partition is not required in a wheelchair accessible toilet compartment greater than 68 inches (1725 mm) in width.

3. Toe clearance is not required in a wheelchair accessible compartment that includes a turning space complying with Section 304.

06-25-2021 AM

604.10.3 Doors. Doors for ambulatory accessible toilet compartments shall comply with Sections 404.2.2, 404.2.3.2, 404.2.4 and 404.2.9. The door shall be self-closing with a balanced door or spring hinges. Door hardware shall comply with Section 404.2.6. In addition a door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Compartment doors shall not swing into the required minimum area of the compartment. Hinge and latch side of the doors are permitted to be oriented so that the door opens in the direction of the approach.

Exceptions:

1. Outside of the ambulatory accessible toilet compartment, the door is not required to comply with Section 404.2.3.2 where the approach is to the latch side of the compartment door, and the clearance between the door side of the compartment and any obstruction is 42 inches (1065 mm) minimum.

2. Within the ambulatory accessible toilet compartment, maneuvering clearances at the door shall not be required to comply with Section 404.2.3.2.

604.11.3 Maneuvering Clearance. A maneuvering clearance around the water closet complying with Section 604.3 shall be provided.
SECTION 605
URINALS

06-32-2021 AS; 06-34-2021 AM

605.3 Clear Floor Space. A clear floor space complying with Section 305.3, positioned for forward approach, shall be provided measured from the front, exterior the rim of the urinal. Where the depth of the forward approach to the urinal exceeds 24 inches (610 mm), the width of the clear floor space shall be a minimum 36 inches (914 mm) and alcove shall comply with Section 305.7.2.

06-34-2021 AM

605.4 Flush controls. Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with Section 309 operable parts.

Exception: The clear floor space shall not be required to extend under the urinal for the purposes of Section 308.2 an unobstructed forward reach where the controls have a high forward reach of 44 inches (1120 mm) maximum.

SECTION 606
LAVATORIES AND SINKS

06-35-2021 AS; 06-37-2021 AM

606.2 Clear floor space. A clear floor space complying with Section 305.3, positioned for forward approach, shall be provided. Knee and toe clearance complying with Section 306 shall be provided. The dip of the overflow shall not be considered in determining knee and toe clearances.

Exceptions:

1. A clear floor space providing a parallel approach shall be permitted at a kitchen sink in a space where a cook top or conventional range is not provided.

2. For other than sinks in kitchens, where a sink requires a deep basin to perform its intended purpose or requires a specialized drain that cannot be located outside of the knee space, a parallel approach shall be permitted to be located adjacent to the sink.

3. The requirement for knee and toe clearance shall not apply to a lavatory in a toilet or bathing facility for a single occupant, accessed only through a private office and not for common use or public use.

4. A knee clearance of 24 inches (610 mm) minimum above the floor shall be permitted at lavatories and sinks used primarily by children ages 6 through 12 where the higher of the rim or counter surface is 31 inches (785 mm) maximum above the floor.

5. A clear floor space providing a parallel approach shall be permitted at lavatories and sinks used primarily by children ages 5 and younger.

6. The requirement for knee and toe clearance shall not apply to more than one bowl of a multibowl sink.
7. A clear floor space providing a parallel approach shall be permitted at wet bars.

8. Within dwelling units and sleeping units, Doors that open and retract into surrounding cabinetry are permitted, provided all requirements are met for clear floor space and knee and toe clearance where doors are fully retracted.

06-38-21 AM

606.4 Faucets. Faucets shall comply with Section 309 operable parts. Hand-operated metering faucets shall remain open for 10 seconds minimum.

Exception: Automatic faucets shall not be required to comply with Section 309 operable parts where the faucets comply with one of the following:

1. For sinks and lavatories provided with a forward approach, the reach to activate the faucet and the reach to the water flow comply with Section 308.2.2 obstructed forward reach.

2. For sinks and lavatories provided with a side approach, the reach to activate the faucets and the reach to the water flow comply with Section 308.3.2 obstructed side reach.

SECTION 607
BATHTUBS

607.1 General. Bathtubs shall comply with Section 607.

06-42-21 AM; 06-45-21 AM; 06-40-21 AM

607.2 Transfer Maneuvering Clearance. A transfer maneuvering clearance in front of at bathtubs extending the length of the bathtub and 30 inches (760 mm) minimum in depth shall be provided. Where a transfer platform or folding in-tub seat is provided at the head end of the bathtub, the transfer maneuvering clearance at the bathtub shall extend 12 inches (305 mm) minimum beyond the wall at the head end of the bathtub.

Exception: In an existing bathtub where bathroom is not reconfigured and a folding in-tub seat is installed, the additional 12 inches (305 mm) transfer maneuvering clearance at the bathtub beyond the wall at the head end of the bathtub is not required if it would result in a reconfiguration of the space.

06-41-21 AM; 06-40-21 AM

Figure 607.2 (A)

TRANSFER Maneuvering CLEARANCE FOR AT BATHTUBS WITH REMOVABLE IN TUB SEATS

06-42-21 AM; 06-45-21 AM; 06-40-21 AM

FIGURE 607.2(B)

TRANSFER Maneuvering CLEARANCE FOR AT BATHTUBS WITH TRANSFER PLATFORMS, AT HEAD END OF TUB

06-45-21 AM
607.2.1 Clear floor space at the Controls Clearance. The clear floor space for toe clearance complying with Section 306.2 at the controls shall extend 6 inches (152 mm) minimum beyond the control end wall. An obstruction by the control wall of 4 inches (102 mm) maximum shall be permitted. An obstruction for the clear floor space shall be permitted at the control wall and 4 inches (102 mm) maximum, measured horizontally.

608.2 Size, maneuvering clearance and seat. Shower compartments shall have sizes, maneuvering clearances and seats complying with Section 608.

608.2.1 Clearance.

Figure 608.2.1.2 (A)

Maneuvering CLEARANCE AT THE TRANSFER-TYPE SHOWER COMPARTMENT CLEARANCE

NEW BUILDINGS – OPTION 1
06-60-21 AM

608.2.1.2.1 **New buildings and facilities.** In new buildings and facilities, a **maneuvering clearance at the shower compartment** of 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment. The length of the **clear floor space maneuvering clearance at the shower compartment** shall be measured perpendicular from either the control wall or from 4 inches (100 mm) behind the control wall. Where the **maneuvering clearance at the shower compartment** is located in an alcove, the **clearance alcove** shall comply with Section 305.7.

06-60-21 AM

608.2.1.2.2 **Existing buildings and facilities.** In existing buildings and facilities, a **maneuvering clearance at the shower compartment** of 48 inches (1220 mm) minimum in length measured perpendicular from the control wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment. Where the **maneuvering clearance** is located in an alcove, the **clearance alcove** shall comply with Section 305.7.

06-61-21 AM

608.2.2.2 **Maneuvering Clearance.** A **maneuvering clearance at the shower compartment** of 60 inches (1525 mm) minimum in length adjacent to the 60-inch (1525 mm) width of the open face of the shower compartment, and 30 inches (760 mm) minimum in depth, shall be provided.

**Exception:** A lavatory complying with Section 606 shall be permitted at the end of the **maneuvering clearance at the shower compartment** opposite the seat.

06-62-21 AM

608.2.3.2 **Maneuvering Clearance.** A **maneuvering clearance at the shower compartment** of 60 inches (1525 mm) minimum in length adjacent to the 60-inch (1525 mm) width of the open face of the shower compartment, and 30 inches (760 mm) minimum in depth, shall be provided.

**Exceptions:**

1. A lavatory complying with Section 606 shall be permitted at the end of the **maneuvering clearance at the shower compartment** opposite the seat.
2. Where no seat is provided, the lavatory complying with Section 606 shall be permitted at either end of the maneuvering clearance at the shower compartment.

06-62-21 AM

Figure 608.2.3.2(A)

Maneuvering CLEARANCE AT THE STANDARD ROLL-IN-TYPE SHOWER COMPARTMENT WITH A SEAT CLEARANCE

06-62-21 AM

FIGURE 608.2.2.2(B)

Maneuvering CLEARANCE AT STANDARD ROLL-IN-TYPE SHOWER COMPARTMENT WITH NO SEAT CLEARANCE

06-65-21 AM

608.2.4.2 Maneuvering Clearance. A door maneuvering clearance shall be provided outside the entry to an alternate roll-in type shower complying with the door maneuvering clearances in Table 404.2.3.4.

06-84-2021 AS – this whole section

SECTION 611

ASSISTED TOILET AND BATHING ROOMS

611.2 Clearances. Bathing room configurations. The configuration of the assisted toilet and bathing room shall comply with 603.2.

611.2.1 Turning Space. A turning space shall be provided within the room.

611.2.2 Door Swing. Doors shall not swing into the bathroom.

Exception: Where a clear floor space complying only with Section 305.3 is provided in the room beyond the arc of the door and emergency rescue door hardware, that allows the door to be swung out of the room, is provided.

611.4 Coat Hooks. Coat hooks shall be located within one of the applicable reach ranges specified in Section 308.

611.5.1 Maneuvering Clearance width. Maneuvering Clearance around the water closet shall be 66 inches (1676 mm) minimum. A minimum dimension of 24 inches (609 mm) shall be provided on each side, measured from the centerline of the water closet.

611.5.2 Maneuvering Clearance depth. Maneuvering Clearance around the water closet shall be 78 inches (1981 mm) minimum in depth, measured perpendicular from the rear wall.
611.5.3 Maneuvering Clearance overlap. The required maneuvering clearance around the water closet shall be permitted to overlap the water closet, associated grab bars, paper dispensers, sanitary napkin receptacles, coat hooks, shelves, accessible routes, clear floor space at other fixtures and the turning space. Towel bars that meet the strength requirements of Section 609.8 shall be permitted to overlap the maneuvering clearance at around the water closet. No other obstructions shall be within the required water closet maneuvering clearance around the water closet.

611.5.6 Floor-mounted support post. A floor-mounted support post, used as an alternate means of support for swing up grab bars shall be designed to meet the structural strength requirements of Section 609.8 and shall be permitted to be located within the maneuvering clearance around the water closet provided it meets all of the following:

1. The floor plate and post shall not extend more than 10 inches (254 mm) in depth measured perpendicular to the back wall,
2. The floor plate and post shall not extend more than 5 inches (127 mm) in width, measured from the centerline of the grab bar to either side,
3. The post location shall not block access to the flush controls, and
4. The floor plate and post shall not overlap any other required clear floor space or maneuvering clearances at fixtures or turning space.

611.7.2 Maneuvering Clearance. A maneuvering clearance at the shower area of 60 inches (1525 mm) minimum in length adjacent to the long side of the shower area, and 30 inches (760 mm) minimum in depth, shall be provided.

Exceptions:

1. A lavatory complying with Section 606 shall be permitted at one end of the maneuvering clearance at the shower area.
2. Where the shower area exceeds minimum sizes, the clear floor space maneuvering clearance at the shower area shall be placed 30 inches (760 mm) minimum from the back wall and the length shall be parallel to the back wall.

SECTION 613
WASHING MACHINES AND CLOTHES DRYERS

06-86-21 AS

613.3 Operable parts. Operable parts, including doors, lint screens, detergent and bleach compartments, shall comply with Sections 308 and 309 reach range and operable parts.

Exceptions:

1. The height of the obstruction in Section 308.3.2 shall be permitted to be 36 inches (915 mm) maximum above the floor.
2. The operable part of the door shall be permitted to be 54 inches (1372 mm) maximum above the floor.

SECTION 615
RINSING SHOWERS

06-76-21 AM

615.2 **Clear-floor Turning space.** A turning space complying with Section 304.3 shall be provided at the shower heads. The turning space shall be located so that the shower pedestal or wall with the shower head are at the one end of the space and centered on the shower head.

06-76-21 AM

615.4 **Controls.** Controls for the water flow shall meet comply with operable parts requirements in accordance with Section 309.

SECTION 616
ADULT CHANGING STATIONS

6-90-2021 AM

616.2.1. **Single user or family or assisted use toilet or bathing room.** Where adult changing stations are provided in a toilet room with only one water closet and one lavatory, or in a family or assisted-use toilet or bathing room, the room shall provide all of the following components:

1. A dispenser for soap complying with Section 308 located within the applicable reach range.
2. A hand towel dispenser or hand dryer complying with Table 603.6.
3. A coat hook located in close proximity to the changing surface.
4. A waste receptacle.
5. Signage indicating “Adult Changing Station” provided at the entrance to the room and complying with the visual character requirements in Section 703.2.
6. Signage indicating the weight capacity and instructions for operation of the changing station within the room.

6-90-2021 AM

616.2.2 **Multi-user toilet or bathing room.** Where adult changing stations are provided in a multi-user toilet or bathing room, the adult changing station shall be located in a compartment that includes all of the following components:

1. Privacy provided by walls, curtains or partitions enclosing the compartment.
2. A turning space complying with Section 304.
3. A lavatory complying with Section 606.
4. A dispenser for soap complying with Section 308 located within the applicable reach range.
5. A hand towel dispenser or hand dryer complying with Table 603.6.
6. A coat hook in close proximity to the changing surface.
7. A waste receptacle.
8. Signage indicating “Adult Changing Station” provided at the entrance to the room and complying with the visual character requirements in Section 703.2.
9. Signage indicating the weight capacity and instructions for operation of the changing station within the compartment.

6-90-2021 AM

616.2.3 Room or space other than a toilet room or bathing room. Where adult changing stations are provided in a room or space other than a toilet or bathing room and including, but not limited to, nurses’ work areas, therapist work areas, or special education classrooms, the adult changing station shall be located in a compartment or room that includes all of the following components:

1. Privacy provided by walls, curtains or partitions.
2. A turning space complying with Section 304.
3. A lavatory complying with Section 606 or an alcohol-based hand sanitizer dispenser.
4. A dispenser for soap complying with Section 308 located within the application reach range.
5. Where a lavatory is provided in the compartment or room, provide a hand towel dispenser or hand dryer complying with Table 603.6.
6. A waste receptacle.
7. Signage indicating the weight capacity and instructions for operation of the changing station within the room.

6-90-2021 AM

616.3 Room clearances configurations. An adult changing station and its supporting structure shall not obstruct required clear floor spaces and maneuvering clearances at accessible elements fixtures, maneuvering clearances at the adult changing stations, maneuvering clearances at doors, or the wheelchair turning spaces.

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616.4.3 Maneuvering Clearances. Maneuvering Clearances at the adult changing surface and complying with Sections 613 616.4.4.1 and 613 616.4.4.2 shall be provided adjacent to the changing surface, and such maneuvering clearances shall be measured when the adult changing surface is in the operational position.

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616.4.3.1 Side maneuvering clearance. A 36-inch (914mm) deep minimum side maneuvering clearance at the adult changing surface shall be provided along the open long side of the adult changing surface.

Exception: In the raised position, the side rail shall be permitted to overlap the side clearance.

6-90-2021 AM
616.4.3.2 End maneuvering clearance. A 36-inch (914mm) wide minimum end maneuvering clearance at the adult changing surface shall be provided along the depth of one end of the changing surface. The width of the end maneuvering clearance shall extend the depth of the changing surface and the side maneuvering clearance.

Exceptions:

1. A 24-inch (610 mm) wide minimum end maneuvering clearance shall be permitted where a clear floor space complying with Section 305.3 is provided within the room beyond the maneuvering clearances for the changing surface.

2. Where installed in locations specified in Section 616.2.3, end maneuvering clearances complying with Section 616.4.3.2 is not required.

6-90-2021 AM

Figure 616.4.4

Size and maneuvering clearances at the adult Changing surface and clearances

6-89-2021 AM

SECTION 617

PET WASHING STATION

6-89-2021 AM

617.3 Operable parts. The operable parts of the controls for on and off water flow, temperature, and diverter shall comply with Section 309 with operable parts. Where a hand shower is provided, a mount to hold the hand shower shall be located in compliance with Section 308-within the applicable reach range.
SECTION 704
TELEPHONES

704.2 Wheelchair accessible telephones. Wheelchair accessible public telephones shall comply with Section 704.2.

   Exception: Drive up only public telephones shall not be required to be provided with a clear floor space complying with Section 704.2.

704.2.1 Clear floor space. A clear floor space shall be provided. The clear floor space shall not be obstructed by bases, enclosures, or seats.

   Exception: A clear floor space is not required at drive-up only public telephones.

704.2.2 Operable parts. Controls on telephones shall comply with Section 709. Telephones shall have push button controls where service for such equipment is available.

704.2.3 Telephone directories. Where provided, telephone directories shall comply with Section 709 operable parts.

704.6 TTY shelf. Where public pay telephones designed to accommodate a portable TTY are provided, they shall be equipped with a shelf and an electrical outlet within or adjacent to the telephone enclosure. The telephone handset shall be capable of being placed flush on the surface of the shelf. The shelf shall be capable of accommodating a TTY and shall have a vertical clearance 6 inches (150 mm) minimum in height above the area where the TTY is placed.

SECTION 804
KITCHENS

804.5.2 Operable parts. All appliance controls shall comply with Section 309 operable parts.

   Exceptions:
   1. Appliance doors and door latching devices shall not be required to comply with Section 309.4.
   2. Bottom-hinged appliance doors, when in the open position, shall not be required to comply with Section 309.3.

804.5.4.2 Forward approach. Where the clear floor space is positioned for a forward approach, knee and toe clearance complying with Section 306 shall be provided. The underside of the cooktop shall be insulated or otherwise configured to prevent burns, abrasions, or electrical shock.

03-10-2021 AM

804.6 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309 operable parts. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309 operable parts. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying with at least one of the following:
1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

SECTION 807
COURTROOMS

807.2 Turning space. Where provided, each area that is raised or depressed shall provide a turning space.

Exception: Levels of jury boxes not required to contain wheelchair spaces a clear floor space in accordance with Section 807.3 shall not be required to comply with this section.

807.3 Clear floor space. Within the defined area of each jury box and witness stand, a clear floor space shall be provided.

Exception: In alterations, wheelchair spaces a clear floor space shall not be required to be located within the defined area of raised jury boxes or witness stands and shall be permitted to be located outside these spaces where ramps or platform lifts restrict or project into the means of egress required by the administrative authority.

SECTION 902
DINING SURFACES AND WORK SURFACES

902.2 Clear floor space. A clear floor space positioned for a forward approach shall be provided. Knee and toe clearance complying with Section 306 shall be provided.

Exceptions:
1. At drink surfaces 12 inches (305 mm) or less in depth, knee and toe clearance shall not be required to extend beneath the surface beyond the depth of the drink surface provided.
2. Dining surfaces that are 15 inches (380 mm) minimum and 24 inches (610 mm) maximum in height are permitted to have a clear floor space positioned for a parallel approach.

902.5.1 Clear floor space. A clear floor space positioned for forward approach with shall be provided. Knee and toe clearance complying with Section 306 shall be provided.

Exception: A knee clearance of 24 inches (610 mm) minimum above the floor shall be permitted.

SECTION 903
BENCHES
SECTION 904
SALES AND SERVICE COUNTERS AND WINDOWS

904.3.3 Forward approach. A portion of the public use side of the counter surface 30 inches (760 mm) minimum in length and 36 inches (915 mm) maximum in height above the floor shall be provided. A clear floor space positioned for a forward approach to the accessible counter shall be provided. Knee and toe clearance complying with Section 306 shall be provided under the accessible counter. The space between the accessible counter surface and any projecting objects above the accessible counter shall be 12 inches (305 mm) minimum.

09-03-2021 AM

904.4.5 Self-bagging surfaces. Self bagging surfaces, where provided, shall be located within the applicable reach ranges in accordance with Section 308.

904.5 Food service lines. Counters in food service lines shall comply with Section 904.5.

904.5.1 Self-service shelves and dispensing devices. Self-service shelves and dispensing devices for tableware, dishware, condiments, food and beverages shall comply with Section 308 within the applicable reach range.

09-04-2021 AS

904.6 Security glazing. Where counters or teller windows have security glazing to separate personnel from the public, a method to facilitate voice communication shall be provided. Telephone handset devices, if provided, shall comply with Section 704.3. Where provided, operable parts controls of a voice communication system shall comply with Section 309 operable parts.

SECTION 905
STORAGE FACILITIES

905.3 Height. Storage elements shall comply with at least one of the applicable reach ranges specified in Section 308.

08-08-2021 AM

905.4 Operable parts. Operable parts Hardware of storage facilities shall comply with Section 309 operable parts.

Exception: Operable parts of kitchen base cabinet storage space required to be moveable by Section 905.5 shall not be required to comply with Section 309 operable parts.

SECTION 906
CHARGING STATIONS

906.3 Height. Charging stations shall comply with at least one of the applicable reach ranges specified in Section 308.

SECTION 1001
GENERAL
1001.3 **Protruding objects.** Protruding objects on circulation paths shall comply with Section 307.

**Exceptions:**

1. Within areas of sport activity, protruding objects on circulation paths shall not be required to comply with Section 307.

2. Within play areas, protruding objects on circulation paths shall not be required to comply with Section 307 provided that ground level accessible routes provide vertical headroom clearance complying with Section 1008.2.

### SECTION 1002
**AMUSEMENT RIDES**

1002.3 **Load and unload areas.** A turning space complying with Sections 304.2 and 304.3 shall be provided in load and unload areas.

1002.4.4. Clearances. **Wheelchair spaces.** Clearances for wheelchair spaces for amusement rides shall comply with Section 1002.4.4.

**Exceptions:**

1. Where provided, securement devices shall be permitted to overlap required clearances of wheelchair space.

2. Wheelchair spaces shall be permitted to be mechanically or manually repositioned.

3. Wheelchair spaces shall not be required to comply with Section 307.4.

1002.4.4.1 **Width and length.** Wheelchair spaces shall provide a clear width of 30 inches (760 mm) minimum and a clear length of 48 inches (1220 mm) minimum measured to 9 inches (230 mm) minimum above the floor.

1002.4.4.2 **Side entry.** Where wheelchair spaces are entered only from the side, amusement rides shall be designed to permit sufficient maneuvering clearance for individuals using a wheelchair or mobility aid device to enter and exit the ride.

1002.4.4.3 **Permitted protrusions in wheelchair spaces.** Objects are permitted to protrude a distance of 6 inches (150 mm) maximum along the front of the wheelchair space, where located 9 inches (230 mm) minimum and 27 inches (685 mm) maximum above the floor of the wheelchair space. Objects are permitted to protrude a distance of 25 inches (635 mm) maximum along the front of the wheelchair space, where located more than 27 inches (685 mm) above the floor of the wheelchair space.

**Figure 1002.4.4.3**

**PROTRUSIONS IN WHEELCHAIR SPACES IN AMUSEMENT RIDES**

1002.5.3 **Transfer entry.** Where openings are provided for transfer to amusement ride seats, the openings shall provide clearance for transfer from a wheelchair or mobility aid device to the amusement ride seat.
1003.2.1 Boat slips. An accessible route shall serve boat slips.

Exceptions:

1. Where an existing gangway or series of gangways is replaced or altered, an increase in the length of the gangway shall not be required to comply with Section 1003.2.

2. Gangways shall not be required to comply with the maximum rise specified in Section 405.6.

3. Where the total length of a gangway or series of gangways serving as part of a required accessible route is 80 feet (24 m) minimum, gangways shall not be required to comply with Section 405.2.

4. Where facilities contain fewer than 25 boat slips and the total length of the gangway or series of gangways serving as part of a required accessible route is 30 feet (9145 mm) minimum, gangways shall not be required to comply with Section 405.2.

5. Where gangways connect to transition plates, landings specified by Section 405.7 shall not be required.

6. Where gangways and transition plates connect and are required to have handrails, handrail extensions shall not be required. Where handrail extensions are provided on gangways or transition plates, the handrail extensions shall not be required to be parallel with the floor.

7. The cross slope specified in Sections 403.3 and 405.3 for gangways, transition plates, and floating piers that are part of accessible routes shall be measured in the static position.

8. Changes in level complying with Sections 303.3 and 303.4 shall be permitted on the surfaces of gangways and piers.

9. Cleats and other boat securement devices shall not be required to comply with reach ranges Section 308.

1003.3 Clearances Clear pier space. Clearances at boat slips and on boarding piers at boat launch ramps shall comply with Section 1003.3.

1003.3.1 Boat slip clearance. Boat slips and boarding piers at boat launch ramps shall provide clear pier space 60 inches (1525 mm) minimum in width that extend the full length of the boat slips or boarding piers. Each 10 feet (3050 mm) of linear pier edge serving boat slips or boarding piers shall contain at least one continuous clear opening 60 inches (1525 mm) minimum in width.

Exceptions:

1. Clear pier space shall be permitted to be 36 inches (915 mm) minimum in width and 24 inches (610 mm) maximum in length, provided that multiple 36-inch (915 mm) wide segments are separated by segments that are 60 inches (1525 mm) minimum in width and 60 inches (1525 mm) minimum in length.

2. Edge protection shall be permitted at the continuous clear openings, provided the edge protection is 4 inches (100 mm) maximum in height and 2 inches (51 mm) maximum in width.
3. In existing piers for boat slips, clear pier space shall be permitted to be located perpendicular to the boat slip and shall extend the width of the boat slip, where the facility has at least one boat slip complying with Section 1003.3, and further compliance with Section 1003.3 would result in a reduction in the number of boat slips available or result in a reduction of the widths of existing slips.

Figure 1003.3.1 (A)
BOAT SLIP AND BOARDING PIER CLEARANCE CLEAR PIER SPACE

Figure 1003.3.1 (B)
BOAT SLIP AND BOARDING PIER CLEARANCE CLEAR PIER SPACE
EXCEPTION 1 – CLEAR PIER SPACE REDUCTION AT BOAT SLIPS AND BOARDING PIERS

Figure 1003.3.1 (C)
BOAT SLIP AND BOARDING PIER CLEARANCE CLEAR PIER SPACE – EXCEPTION 2 – EDGE PROTECTION AT BOAT SLIPS AND BOARDING PIERS

11-05-21 AS

1103.3.2 Turning space. All rooms served by an accessible route shall provide a turning space complying with Section 304.

   Exceptions:
   1. A turning space is not required in toilet rooms and bathrooms that are not required to comply with Section 1103.11.2.
   2. A turning space is not required within closets or pantries that are 48 inches (1220 mm) maximum in depth.

SECTION 1004
EXERCISE MACHINES AND EQUIPMENT

1004.3 Operable parts. The operable parts of exercise machines and exercise equipment shall not be required to comply with Section 309 operable parts.

SECTION 1005
FISHING PIERS AND PLATFORMS

1005.6 Turning space. At least one turning space complying with Section 304.3 shall be provided on fishing piers and platforms.

SECTION 1007
MINIATURE GOLF FACILITIES
1007.3.1 Start of play. A clear floor space clearance 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum with slopes not steeper than 1:48 shall be provided at the start of play.

1007.3.2 Golf club reach range area.

Figure 1007.3.2 (A)
GOLF CLUB REACH RANGE AREA – NEW BUILDINGS

Figure 1007.3.2 (B)
GOLF CLUB REACH RANGE AREA – EXISTING BUILDINGS

1007.3.2.1 New buildings and facilities. In new buildings and facilities, areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor space clearance 36 inches (915 mm) minimum in width and 52 inches (1320 mm) minimum in length having a running slope not steeper than 1:20. The clear floor space clearance shall be served by an accessible route.

1007.3.2.2 Existing buildings and facilities. In existing building and facilities, areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor space clearance 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in length having a running slope not steeper than 1:20. The clear floor space clearance shall be served by an accessible route.

SECTION 1008
PLAY AREAS

1008.4.1 Accessible routes. Accessible routes serving play areas shall comply with Chapter 4 and Section 1008.4.1. Where accessible routes serve ground level play components, the vertical headroom clearance shall be 80 inches (2030 mm) minimum in height.

Exceptions:

1. Where 20 or more elevated play components are provided, transfer systems complying with Section 1008.4.2 shall be permitted to be used as part of an accessible route for a maximum of 25 percent of the play components.

2. Where fewer than 20 elevated play components are provided, transfer systems complying with Section 1008.4.2 shall be permitted to be used as part of an accessible route.

3. Where transfer systems are provided, an elevated play component shall be permitted to connect to another elevated play component as part of an accessible route.

4. Accessible routes serving soft contained play structures shall be permitted to use transfer systems complying with Section 1008.4.2 as part of an accessible route.

5. Where the surface of the accessible route, clear floor spaces, or turning spaces serving water play components is submerged, complying with Sections 302, 403.3, 405.2, 405.3 and 1008.4.1.6 shall not be required.
6. Accessible routes serving water play components shall be permitted to use transfer systems complying with Section 1008.4.2 to connect elevated play components in water.

1008.4.1.1 Ground level. At ground level, the clear width of accessible routes shall be 60 inches (1525 mm) minimum.

Exceptions:

1. In play areas less than 1000 square feet (93 m²), the clear width of accessible routes shall be permitted to be 44 inches (1120 mm) minimum, if at least one turning space complying with Section 304.3 is provided where the restricted accessible route exceeds 30 feet (9145 mm) in length.

2. The clear width of accessible routes shall be permitted to be 36 inches (915 mm) minimum for a distance of 60 inches (1525 mm) maximum provided that multiple reduced width segments are separated by segments that are 60 inches (1525 mm) minimum in width and 60 inches (1525 mm) minimum in length.

10-03-2021 AS

SECTION 1009
SWIMMING POOLS, WADING POOLS, COLD BATHS, HOT TUBS AND SPAS

1009.4 Transfer walls. Transfer walls shall comply with Section 1009.4.

1009.4.1 Clear deck space. A clear deck space of 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum with a slope not steeper than 1:48 shall be provided at the base of the transfer wall. Where one grab bar is provided, the clear deck space shall be centered on the grab bar. Where two grab bars are provided, the clear deck space shall be centered on the clearance between the grab bars.

1009.4.5 Grab bars. At least one grab bar complying with Sections 609.1 through 609.3 and 609.5 through 609.8 shall be provided on the transfer wall. Grab bars shall be perpendicular to the pool wall and shall extend the full depth of the transfer wall. The top of the gripping surface shall be 4 inches (100 mm) minimum and 6 inches (150 mm) maximum above the transfer wall. Where one grab bar is provided, clearance shall be the seat area on top of the transfer wall shall extend 24 inches (610 mm) minimum on both sides of the grab bar. Where two grab bars are provided, clearance the seat area on top of the transfer wall between grab bars shall be 24 inches (610 mm) minimum.

SECTION 1010
SHOOTING FACILITIES WITH FIRING POSITIONS

1010.2 Turning space. A circular turning space complying with Section 304.3.1 with slopes not steeper than 1:48 shall be provided at shooting facility firing positions.

SECTION 1102
ACCESSIBLE UNITS
1102.9 Operable parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls and user controls for security or intercom systems shall comply with Section 309 operable parts.

Exception: Receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1102.9.1.

1102.9.1 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309 operable parts. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309 operable parts. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall comply with at least one of the following:

1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

1102.15.1 Clear floor space. A clear floor space complying with Section 305 shall be provided on both sides of the bed. The clear floor space shall be positioned for parallel approach to the side of the bed with the entire length of the clear floor space positioned next to the mattress.

Exception: Where a single clear floor space positioned for parallel approach is provided between two beds, a clear floor space shall not be required on both sides of the bed.

SECTION 1103
TYPE A UNITS

1103.9 Operable Parts. Lighting controls, electrical panelboards, electrical switches, and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls, and user controls for security intercom systems shall comply with Section 309 operable parts.

Exception: Receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1103.9.1.

1103.9.1 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least two receptacle outlets serving counters shall comply with Section 309 operable parts. Where a work surface is required by Section 1103.12.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall comply with at least one of the following:
1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.

2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.

3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

1103.11.1 Grab bar and shower seat reinforcement. Reinforcement shall be provided for the future installation of grab bars complying with Section 604.5 at water closets; grab bars complying with Section 607.4 at bathtubs; and for grab bars and shower seats complying with Sections 608.3, 608.2.1.3, 608.2.2.3 and 608.2.3.2 at shower compartments.

Exceptions:

1. At fixtures not required to comply with Section 1103.11.2, reinforcement in accordance with Section 1104.11.1 shall be permitted.

2. Reinforcement is not required in a room containing only a lavatory and a water closet, provided the room does not contain the only lavatory or water closet on the accessible level of the dwelling unit.

3. Reinforcement for the water closet side wall vertical grab bar component required by Section 604.5 is not required.

4. Where the lavatory overlaps the water closet maneuvering clearance around the water closet in accordance with the exception to Section 1103.11.2.4.4 reinforcement at the water closet rear wall for a 24-inch (610 mm) minimum length grab bar, centered on the water closet, shall be provided.

1103.11.2.1 Doors. Doors shall not swing into the clear floor space or maneuvering clearance for any fixture.

Exception: Where a clear floor space is provided within the room beyond the arc of the door swing.

1103.11.2.4 Water closet. Water closets shall comply with Section 1103.11.2.4.

Figure 1003.11.2.4 (A)
WATER CLOSETS IN TYPE A UNITS – WATER CLOSET LOCATION

Figure 1103.11.2.4 (B)
WATER CLOSETS IN TYPE A UNITS – MINIMUM MANEUVERING CLEARANCE AROUND THE WATER CLOSET

Figure 1103.11.2.4 (C)
WATER CLOSETS IN TYPE A UNITS – MANEUVERING CLEARANCE AROUND THE WATER CLOSET WITH LAVATORY (OVERLAP EXCEPTION)

Figure 1103.11.2.4 (D)
WATER CLOSETS IN TYPE A UNITS – WATER CLOSET SEAT HEIGHT
\textbf{1103.11.2.4.1 Location.} The water closet shall be positioned with a wall to the rear and to one side. The centerline of the water closet shall be 16 inches (405 mm) minimum and 18 inches (455 mm) maximum from the sidewall.

\textbf{1103.11.2.4.2 Maneuvering Clearance width.} Maneuvering Clearance around the water closet shall be 60 inches (1525 mm) minimum in width, measured perpendicular from the side wall.

\textbf{1103.11.2.4.3 Maneuvering Clearance depth.} Maneuvering Clearance around the water closet shall be 56 inches (1420 mm) minimum in depth, measured perpendicular from the rear wall.

\textbf{1103.11.2.4.4 Maneuvering Clearance overlap.} The required maneuvering clearance around the water closet shall be permitted to overlap the water closet, associated grab bars, paper dispensers, coat hooks, shelves, accessible routes, clear floor space required at other fixtures, and the wheelchair turning space. No other fixtures or obstructions shall be located within the required water closet maneuvering clearance around the water closet.

\textbf{Exception:} A lavatory measuring 24 inches (610 mm) maximum in depth and complying with Section 1103.11.2.2 shall be permitted on the rear wall 18 inches (455 mm) minimum from the centerline of the water closet to the side edge of the lavatory where the maneuvering clearance at around the water closet is 66 inches (1675 mm) minimum measured perpendicular from the rear wall.

\textbf{1103.11.2.4.6 Flush controls.} Flush controls shall be hand-operated or automatic. Hand operated flush controls shall comply with Section 309 operable parts. Hand-operated flush controls shall be located on the open side of the water closet.

\textbf{11-11-2021 AS}

\textbf{1103.11.2.5.1 Bathtub.} Bathtubs shall comply with Section 607.

\textbf{Exceptions:}

1. A removable in-tub seat in accordance with Section 607.3 is not required.
2. Countertops and cabinetry shall be permitted at one end of the maneuvering clearance at the bathtub, provided the following criteria are met:
   1. The countertop and cabinetry can be removed;
   2. The floor finish extends under the countertop and cabinetry; and
   2.3. The walls behind and surrounding the countertop and cabinetry are finished.

\textbf{Figure 1103.11.2.5.1 (A)}
\textbf{Maneuvering CLEARANCE FOR AT BATHTUBS IN TYPE A UNITS WITH REMOVABLE SEAT}

\textbf{Figure 1103.11.2.5.1 (B)}
\textbf{Maneuvering CLEARANCE FOR AT BATHTUBS IN TYPE A UNITS WITH PERMANENT SEAT}

\textbf{1103.11.2.5.2 Shower.} Showers shall comply with Section 608.
Exception: At standard roll-in shower compartments complying with Section 608.2.2, lavatories, countertops and cabinetry shall be permitted at one end of the maneuvering clearance at the shower compartment, provided the following criteria are met:

1. The countertop and cabinetry can be removed;
2. The floor finish extends under the countertop and cabinetry; and
3. The walls behind and surrounding the countertop and cabinetry are finished.

Figure 1103.11.2.5.2

STANDARD ROLL-IN-TYPE SHOWER COMPARTMENT IN TYPE A UNITS

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1103.11.2.5.3 Bathtub or shower enclosures. A bathtub or shower enclosure shall be permitted where the assembly on the side of the bathtub or shower where the maneuvering clearance at the bathtub or shower is provided can be removed without removal or replacement of the surrounding walls and floor to which it is affixed.

1103.12.3.1 Clear floor space. A clear floor space, positioned for a forward approach to the work surface, shall be provided. Knee and toe clearance complying with Section 306 shall be provided.

Exception: Cabinetry shall be permitted under the work surface, provided the following criteria are met:

1. The cabinetry can be removed without removal or replacement of the work surface,
2. The floor finish extends under the cabinetry, and
3. The walls behind and surrounding the cabinetry are finished.

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1103.12.4.1 Clear floor space. A clear floor space, positioned for a forward approach to the sink, shall be provided. Knee and toe clearance complying with Section 306 shall be provided.

Exceptions:

1. The requirement for knee and toe clearance shall not apply to more than one bowl of a multi-bowl sink.
2. Cabinetry shall be permitted to be added under the sink, provided the following criteria are met:
   2.1 The cabinetry can be removed without removal or replacement of the sink,
   2.2 The floor finish extends under the cabinetry, and
   2.3 The walls behind and surrounding the cabinetry are finished.
3. A clear floor space providing a parallel approach that is offset 8 inches (200 mm) maximum from the centerline of the sink shall be permitted at a kitchen sink in a space where a cook top or conventional range is not provided.
4. A clear floor space providing a parallel approach that is offset 8 inches (200 mm) maximum from the centerline of the sink shall be permitted at wet bars.

**1103.12.5.4.2 Forward approach.** Where the clear floor space is positioned for a forward approach, knee and toe clearance complying with Section 306 shall be provided. The underside of the cooktop shall be insulated or otherwise configured to protect from burns, abrasions or electrical shock.

**SECTION 1104**
**TYPE B UNITS**

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

**1104.1.1 Clear floor space.** For Type B units, clear floor spaces shall be 48 inches (1220 mm) minimum in length and 30 inches (760 mm) minimum in width.

**1104.4.1 Clear width.** The clear width of an accessible route shall comply with Section 403.5.

**Exceptions:**

1. The clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

2. Where an accessible route makes a 180-degree turn around an object that is less than 48 inches (1220 mm) in width, clear widths shall be 42 inches (1065 mm) minimum approaching the turn, 48 inches (1220 mm) minimum during the turn and 42 (1065 mm) inches minimum leaving the turn.

3. Where an accessible route makes a 180-degree turn around an object that is less than 48 inches (1220 mm) in width, the clear width approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum provided the clear width during the turn is 60 inches (1525 mm) minimum.

4. Where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum.

5. An accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2.2, provided the base and arms of the T-shaped space extend 48 inches (1220 mm) minimum beyond the intersection.

**06-72-21 AM**

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

**Exception:** Doors that are part of a shower enclosure shall not be required to comply with this section.
1104.5.2.1 **Clear width.** Doorways shall have a clear opening of 31\(\frac{3}{4}\) inches (805 mm) minimum. Clear opening of swinging doors shall be measured between the face of the door and stop, with the door open 90 degrees.

1104.5.2.1.1 **Double leaf doorways.** Where the operable parts on an inactive leaf of a double leaf doorway are located more than 48 inches (1220 mm) or less than 15 inches (380 mm) above the floor, the active leaf shall provide the clearance clear opening required by Section 1104.5.2.1.

11-19-2021 AS; 11-20-2021 AS

1104.9 **Operable Parts.** Lighting controls, electrical switches and receptacle outlets, environmental controls, electrical panelboards, and user controls for security or intercom systems shall comply with Sections 309.3 and 1104.1.1 clear floor spaces for Type B units.

**Exceptions:**

1. Receptacle outlets serving a dedicated use.
2. Floor receptacle outlets.
3. HVAC diffusers.
4. Controls mounted on ceiling fans.
5. Controls or switches mounted on appliances.
6. Plumbing fixture controls.
7. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
8. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to comply with Sections 309.3 and 1104.1.1 clear floor space for Type B units.
9. Operable parts of lighting controls, electrical switches, and receptacle outlets serving counters in kitchens and bathrooms shall not be required to comply with Sections 309.3 and 1104.1.1 clear floor space for Type B units where located 44 inches maximum above the floor.
10. Operable parts of lighting controls, electrical switches, and receptacle outlets serving counters in kitchens and bathrooms shall not be required to comply with Sections 309.3 and 1104.1.1 clear floor space for Type B units where located on the side wall over the counter 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
11. Operable parts of receptacle outlets serving counters in kitchens and bathrooms shall not be required to comply with Sections 309.3 and 1104.1.1 clear floor space for Type B units where located at the face of the upper cabinets 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

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

11-19-2021 AS

1104.10.1 **Clear floor space.** A clear floor space for Type B units shall be provided for each washing machine and clothes dryer. A parallel approach shall be provided for a top loading machine. A forward or parallel approach shall be provided for a front loading machine. The centerline of the clear floor space for Type B units shall be offset 24 inches (610 mm) maximum from the centerline of the appliance.
**1104.11.2 Clear floor space.** Clear floor spaces required by Section 1104.11.3.1 (Option A) or 1104.11.3.2 (Option B) shall comply with Sections 1104.11.2 and **1104.11.4** the clear floor space for Type B units.

**1104.11.2.1 Doors.** Doors shall not swing into the clear floor space for Type B units or **maneuvering** clearance for any fixture.

**Exception:** Where a clear floor space for Type B units, excluding knee and toe clearances under elements, is provided within the room beyond the arc of the door swing.

**1104.11.2.2 Knee and toe clearance.** Clear floor space for Type B units at fixtures shall be permitted to include knee and toe clearances complying with Section 306.

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03-06-2021 AM; 11-24-2021 AS

**1104.11.3.1.1 Lavatory.** A clear floor space for Type B units positioned for a parallel approach shall be provided at a lavatory. The clear floor space for Type B units shall be offset 8 inches (200 mm) maximum from the centerline of the lavatory.

**Exception:** A lavatory complying with Section 606 except with a clear floor space for Type B units complying with Section 1104.1.1 shall be permitted. Cabinetry shall be permitted under the lavatory provided the following criteria are met:

1. The cabinetry can be removed without removal or replacement of the lavatory, and
2. The floor finish extends under the cabinetry, and
3. The walls behind and surrounding the cabinetry are finished.

**1104.12.2 Clear floor space.** Clear floor spaces for Type B units at appliances shall comply with Sections 1104.12.2 and 1104.1.1.

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03-06-2021 AM

**1104.12.2.1 Sink.** A clear floor space for Type B units, positioned for a parallel approach to the sink, shall be provided. The clear floor space for Type B units shall be offset 8 inches (200 mm) maximum from the centerline of the sink bowl.

**Exception:** A sink with a forward approach complying with Section 1103.12.4.1.

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

**1104.12.2.3 Cooktop.** Cooktops shall comply with Section 1104.12.2.3.

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

**1104.12.2.3.2 Forward approach.** Where the clear floor space for Type B units is positioned for a forward approach, knee and toe clearance complying with Section 306 shall be provided. The underside of the cooktop shall be insulated or otherwise configured to prevent burns, abrasions, or electrical shock.

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03-06-2021 AM
1104.12.2.3 Parallel approach. Where the clear floor space for Type B units is positioned for a parallel approach, the clear floor space for Type B units shall be offset 8 inches (200 mm) maximum from the centerline of the appliance.

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

1104.12.2.5 Refrigerator/freezer. The refrigerator/freezer shall comply with Section 1104.1.2.5.

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

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

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

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

03-06-2021 AM; 11-24-2021 AS

1104.11.3.1.1 Lavatory. A clear floor space positioned for a parallel approach shall be provided at a lavatory. The clear floor space shall be offset 8 inches (200 mm) maximum from the centerline of the lavatory.

Exception: A lavatory complying with Section 606 except with a clear floor space complying with Section 1104.1.1 for Type B units shall be permitted. Cabinetry shall be permitted under the lavatory provided the following criteria are met:

1. The cabinetry can be removed without removal or replacement of the lavatory, and
2. The floor finish extends under the cabinetry, and
3. The walls behind and surrounding the cabinetry are finished.

SECTION 1105
TYPE C (VISITABLE) UNITS

1105.6 Toilet room or bathroom. At a minimum, the toilet room or bathroom required by Section 1105.4 shall include a lavatory and a water closet. Reinforcement shall be provided for the future installation of grab bars at water closets. Maneuvering clearances at around the water closet shall comply with Section 1104.11.3.1.2.
**REASON:** Affected proposals –03-10, 04-06, 06-01, 06-02, 06-10, 06-15, 06-27, 06-32, 06-34, 06-40, 06-45, 06-60, 06-61, 06-62, 06-65, 06-72, 06-76, 06-84, 06-89, 06-90, 08-08, 09-01, 09-03, 09-04, 11-04, 11-07, 11-08, 11-19, 11-20, 11-24

The standard is inconsistent in the use of terms and references for the building blocks. Given the number of times each term is used, a reference for each building block every time it is used is unwieldy and confusing. Since this is a primary element of compliance, the Terminology work group is proposing a definition for each building block including (see Section…) for the applicable requirements. This would eliminate the need for the references in the text. Having the defined terms italicized will reinforce this concept in the standard. The references within Chapter 3 will remain. The intent is to keep this an editorial change, so specific references in the chapters will remain in place unless specifically noted.

Clear floor space is used 217 times –
- Note that Section 305 includes alcove provisions, so the alcoves do not need to be called out separately if we define clear floor space. Propose to delete the reference to Section 305 and use defined term. – Example 602.4.1.

Clear floor area – 9 times
- See separate change for elevators for ‘clear inside floor area’
- Change definition of wheelchair charging area for consistent terminology based on

Clearance – 325 times
- “Maneuvering” clearance was clarified at toilets, showers, bathtubs, adult changing tables, and used consistently with doors and alcoves – Examples Sections 604.2, 607.2, 608.2
- Vertical clearance was used for people and vehicles – split between headroom and vehicle clearance as applicable. Example – 307.4, 502.6
- Clearance at kitchens, gaps at elevators, or space at handrails has no changes

Turning space – 79 times
- Inconsistent reference to Section 304 – suggest deletion of reference and use defined term – Example 604.9.5.1
- If you only reference the size, you miss the floor surface and door swing sections – suggesting deleting specific reference and just use ‘circular’ or ‘T-shaped’ turning space – Example – Section 403.5.4.1

Reach range – 72 times
- Inconsistent reference to Section 308 – suggest deletion of reference and use defined term – Example 611.4, 909.4.4.5
- Concern about entire operable part within the range specified – coordinated with operable parts clarifications from the Reach task group (see separate proposal for elevator controls)
- ‘applicable’ since this could be a side or forward reach

Operable parts
- Inconsistent reference to Section 309 – suggest deletion of reference and use defined term – Example 602.2.2, 605.4
- No changes if the operable parts only lists section other than 309. – Example – Section 602.4.2.
Additional details on specific sections –
301.2 – change to “element” to match Section 306.1, and would address other elements like adult changing tables.
603.2 and 611.3 – added a charging sentence and changed title to be consistent with requirements in this section.
603.2.2 Exception 2 – all other locations where the wheelchair space is past the swing of the door specifically reference 305.3 so this is for consistency – this would match LULAs, Assisted toileting and bathing, adult changing stations, saunas and steam rooms, dressing and fitting rooms, transfer spaces for play equipment.
603.6 – this is not operable parts – it is the reach over counters for depth to towel dispensers and soap.
603.2 and 606.2 – a clear floor space for front approach at a urinal or at a lavatory will also have to meet the alcove provisions, so the reference to 305.3 is removed. For urinals and the last sentence should be deleted. How to measure the location will remain.
607.2.1 – Separate maneuvering clearance at the tub from the clear floor space for the controls. Using correct terminology. Removes duplicate phrases.
608.2.1.2.1 – The clear floor space would also reference the alcove provisions, but a maneuvering clearance does not, so in this case the reference to the alcove provisions would be correct – there is a suggestion for consistent terminology.
704.2, 704.2.1 – The exception is for clear floor space, so it is moved to the appropriate section.
1002.4.4 – the section is inconsistent in terminology
1003.3 – This is only one section, so no need for charging section. Change title and figure titles to match text.
1009.4.5 – clarification of what is required – not really a clearance, especially with only one bar.

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Report for E-03-2023

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E-04 – 2023 Public Comment - Editorial
407, 408, 409, 410

Proponent: Marsha Mazz, representing Terminology Task Group

Revise as follows:

SECTION 407
ELEVATORS

04-24-2021 AS; 04-25-2021 AM

407.2.1.1 Height. Call buttons, keypads, and hall call consoles shall be located within the applicable reach range, and not less than vertically 30 inches (760 mm) minimum and 48 inches (1220 mm) maximum above the floor, measured to the centerline of the operable parts.

Exceptions:
1. Existing call buttons, existing keypads and hall call consoles shall be permitted to be located 54 inches (1370 mm) maximum above the floor, measured to the centerline of the highest operable part.
2. Where additional call buttons, keypads or other means are provided, they shall be permitted to be located outside the specified applicable reach range.

04-24-2021 AS

407.2.3.7.2 Touch screen call console arrangement. Where touch screen call consoles are provided, the touch screen shall be located directly above the accessibility function button. Any portion of the touch screen requiring user input shall be located within the applicable reach range at a maximum height of 48 inches (1220 mm), above the finished floor. The accessibility function button shall be located within the applicable reach range and at a height not less than 30 inches (760 mm), measured to the centerline of the button, above the finished floor.

407.4 Elevator car requirements. Elevator cars shall comply with Section 407.4.

407.4.1 Inside dimensions. Inside dimensions of elevator cars shall comply with Table 407.4.1.

Exception: Existing elevator car configurations that provide a clear inside floor area of 16 square feet (1.5 m²) minimum, and provide a clear inside dimensions of 36 inches (915 mm) minimum in width and 54 inches (1370 mm) minimum in depth, shall be permitted.

407.4.3 Platform to hoistway clearance. The clearance between the car platform sill and the edge of any hoistway landing shall comply with ASME A17.1/CSA B44 listed in Section 106.2.9.

407.4.6 Elevator car controls. Where provided, elevator car controls shall comply with operable parts and Sections 407.4.6 and 309.
407.4.6.1 Location. Controls shall be located within one of the applicable reach ranges specified in Section 308.

Exceptions:
1. Where the elevator panel complies with Section 407.4.8.
2. In existing elevators, where a parallel approach is provided to the controls, car control buttons with floor designations shall be permitted to be located 54 inches (1370 mm) maximum above the floor. Where the panel is changed, it shall comply with Section 308 reach ranges.

04-33-2021 AM
407.4.10.1 Height. Operable parts of the communication system shall be located within the applicable reach range and 30 inches (760 mm) minimum and 48 inches (1220 mm) maximum above the floor.

SECTION 408
LIMITED-USE/LIMITED-APPLICATION ELEVATORS
408.3.3.2 Cars with doors on adjacent sides. Car doors shall be permitted to be located on adjacent sides of cars that provide an a clear inside floor area of 18 square foot (1.67 m²) minimum platform. Doors located on the narrow end of cars shall provide a clear opening width of 36 inches (915 mm) minimum. Doors located on the long side shall provide a clear opening width of 42 inches (1065 mm) minimum and be located as far as practicable from the door on the narrow end.

Exception: Car doors that provide a clear opening width of 36 inches (915 mm) minimum shall be permitted to be located on adjacent sides of cars that provide a clear floor area inside dimensions of 51 inches (1295 mm) in width and 51 inches (1295 mm) in depth.

408.4 Elevator car requirements. Elevator cars shall comply with Section 408.4.
408.4.1 Inside dimensions. Elevator cars shall provide a clear floor width inside dimension of 42 inches (1065 mm) minimum in width. The clear inside floor area shall not be less than 15.75 square feet (1.46 m²). The elevator car shall provide a clear floor space complying with Section 305.3.

Exceptions:
1. For installations in existing buildings, elevator cars that provide a clear inside floor area of 15 square feet (1.4 m²) minimum, and provide a clear inside dimensions of 36 inches (915 mm) minimum in width and 54 inches (1370 mm) minimum in depth, shall be permitted. This exception shall not apply to cars with doors on adjacent sides.
2. For installations in existing buildings, elevator cars that provide a clear inside dimensions width of 51 inches (1295 mm) minimum in width, a clear depth of 51 inches (1295 mm) minimum in depth and car doors providing a clear opening width of 36 inches (915 mm) wide minimum shall be permitted.

408.4.3 Platform to hoistway clearance. The clearance between the car platform sill and the edge of any hoistway landing shall comply with ASME A17.1/CSA B44 listed in Section 106.2.9.
SECTION 409
PRIVATE RESIDENCE ELEVATORS

409.2 Call controls. Call buttons at elevator landings shall comply with Section 309 operable parts. Call buttons shall be 3/4 inch (19 mm) minimum in their smallest dimension.

409.3.3 Door or gate location and width. Car gates or doors positioned at a narrow end of the clear inside floor area required by Section 409.4.1 shall provide a clear opening width of 32 inches (815 mm) minimum. Car gates or doors positioned on adjacent sides shall provide a clear opening width of 42 inches (1065 mm) minimum.

409.4 Inside dimensions.

409.4.1 New buildings. In new buildings, elevator cars shall provide a clear floor area inside dimensions of 36 inches (915 mm) minimum in width and 52 inches (1320 mm) minimum in depth.

409.4.1.2 Existing buildings. In existing buildings, elevator cars shall provide a clear floor area inside dimensions of 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in depth.

409.4.3 Platform to hoistway clearance. The clearance between the car platform sill and the edge of any hoistway landing shall be 1 1/4 inches (32 mm) maximum.

409.4.6 Elevator car controls. Elevator car controls shall comply with Sections 409.4.6 and the operable parts requirements Section 309.4.

409.4.6.1 Buttons. Control buttons shall be 3/4 inch (19 mm) minimum in their smallest dimension. Control buttons shall be raised or flush.

409.4.6.2 Height. Buttons with floor designations shall comply with the operable parts requirements Section 309.3.

409.4.6.3 Location. Controls shall be on a sidewall, 12 inches (305 mm) minimum from any adjacent wall.

Figure 409.4.6.3
LOCATION OF CONTROLS IN PRIVATE RESIDENCE ELEVATORS

409.4.7 Emergency communications. Emergency communications systems shall comply with Section 409.4.7.

409.4.7.1 Type. A telephone and emergency signal device shall be provided in the car.

409.4.7.2 Operable parts. The telephone and emergency signaling device shall comply with Section 309.3 and 309.4.

409.4.7.3 Compartment. If the device is in a closed compartment, the compartment door hardware shall comply with Section 309 operable parts.

409.4.7.4 Cord. The telephone cord shall be 29 inches (735 mm) minimum in length.

409.4.7.2 Operable parts. The telephone and emergency signaling device shall comply with Section 309.3 and 309.4.

SECTION 410
PLATFORM LIFTS
410.5 Clear inside floor space area. Clear inside floor space dimensions of platform lifts shall comply with Section 410.5.

410.5.1 Lifts with single door or doors on opposite ends.
   410.5.1.1 New buildings. In new buildings, platform lifts with a single door or doors on opposite ends shall provide a clear floor width inside dimensions of 36 inches (915 mm) minimum in width and a clear floor depth of 52 inches (1320 mm) minimum in depth.
   Exception: Inclined platform lifts with passenger restraining arms, shall be permitted to provide a clear floor area inside dimensions of 36 inches (915 mm) minimum in width and a clear floor depth of 48 inches (1220 mm) minimum in depth.

Figure 410.5.1.1
PLATFORM LIFTS – SIZE WITH SINGLE DOOR OR DOORS ON OPPOSITE ENDS – NEW BUILDINGS

410.5.1.2 Existing buildings. In existing buildings, platform lifts with a single door or with doors on opposite ends shall provide a clear floor width inside dimensions of 36 inches (915 mm) minimum in width and a clear floor depth of 48 inches (1220 mm) minimum in depth.

Figure 410.5.1.2
PLATFORM LIFTS – SIZE WITH SINGLE DOOR OR DOORS ON OPPOSITE ENDS – EXISTING BUILDINGS

410.5.2 Platform lifts with doors on adjacent sides.
   410.5.2.1 New buildings. In new buildings, platform lifts with doors on adjacent sides shall provide a clear floor width inside dimensions of 42 inches (1065 mm) minimum in width and a clear floor depth of 60 inches (1525 mm) minimum in depth.

Figure 410.5.2.1
PLATFORM LIFTS – SIZE WITH DOORS ON ADJACENT SIDES – NEW BUILDINGS

410.5.2.2 Existing buildings. In existing buildings, platform lifts with doors on adjacent sides shall be permitted to provide a clear floor width inside dimensions of 36 inches (915 mm) in width and a clear floor depth of 60 inches (1525 mm) in depth.

Figure 410.5.2.2
PLATFORM LIFTS – SIZE WITH DOORS ON ADJACENT SIDES – EXISTING BUILDINGS

410.6 Operable parts. Controls for platform lifts shall comply with Section 309 operable parts.

REASON: This is part of the proposals from the Terminology Work Group. It is assumed that this will be referred to the Editorial committee if the A117.1 committee agrees with the concept. See comments to 04-24, 04-25 and 04-33 for parts related to new text.

Provide inside dimensions for elevators and platform lifts. Put the elevator buttons consistent with the revised interpretation for reach range (entire operable part within reach ranges). 

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ICC A117.1 Comments on 1st draft Chapters 1 to 5 – 8-31-2023
Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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E-05 - 2023 Public Comment (Editorial for 05-19)
505.10, 505.10.1, 505.10.2, 505.10.3

**Proponent:** Thomas B Zuzik Jr, Railingcodes.com, representing National Ornamental & Miscellaneous Metals Association (NOMMA)

Replace figures with the following:

**SECTION 506**
**HANDRAILS**

05-19-2021 AM

**506.10 Handrail extensions.** Handrail extensions shall be in accordance with Section 506.10 and shall extend not less than the minimum required distance beyond and in the same direction of stair flights and ramp runs without any change in direction or a decrease in clearances required by Sections 506.5 and 506.6.

**Exceptions:**

1. Continuous handrails at the inside turn of stairs and ramps.
2. Handrail extensions shall not be required in aisles serving seating where the handrails are discontinuous to provide access to seating and to permit crossovers within the aisle.
3. In alterations, full extensions of handrails shall not be required where such extensions would be hazardous due to plan configuration.

**506.10.1 Top and bottom extension at ramps.** Ramp handrails shall extend horizontally above the landing 12 inches (305 mm) minimum beyond the top and bottom of ramp runs. Extensions shall return to a wall, guard, or floor, or shall be continuous to the handrail of an adjacent ramp run.
FIGURE 506.10.1
TOP AND BOTTOM HANDRAIL EXTENSION AT RAMPS

506.10.2 Top extension at stairs. At the top of a stair flight, handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum, beginning directly above the landing nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight.
506.10.3 **Bottom extension at stairs.** At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance equal to one tread depth beyond the bottom tread nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight.
(Note: Replace existing figure.)
FIGURE 506.10.3
BOTTOM HANDRAIL EXTENSION AT STAIRS

REASON: These are new suggested figures. These graphics better illustrate the current text.

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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**Report for E-05-2023**

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Committee Reason:

**BALLOT COMMENT - SECOND DRAFT:**

Proponent:

Desired Action:

Modification:

Reason:

Committee decision: AS/AM/D

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CHAPTER 1
APPLICATION AND ADMINISTRATION

01-05 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

01-05 – 2021
107.5

**Proponent:** Sharon Toji, Access Communications

**Revise as follows:**

SECTION 107
DEFINITIONS

107.5 Defined terms.
**dark:** when used in the standard in reference to contrast of adjoining finishes of architectural elements, dark means colors with very low light reflectance values (LRV), approaching black.

**light:** when used in the standard in reference to contrast of adjoining finishes of architectural elements, light means colors with very high light reflectance values (LRV), approaching white.

**light reflectance value (LRV):** A figure from 0-100 given to a surface that represents the amount of visible light it reflects when illuminated by a light source with pure white reflecting 100% of the light that hits it, and pure black absorbing all the light and reflecting none or 0.

**REASON:** Since we have been not been able as a committee to reach an agreement on contrast I believe that at the very least, presuming we don’t reach any agreement for change during this session, we should include a definition for the words “dark” and “light.” There are actually dictionary definitions for each. For instance, the Oxford English Dictionary defines dark, when used in reference to colors as follows: “dark (of a color or object) not reflecting much light; approaching black in shade.” The example given is ‘dark green’. Light is defined as follows: “light -an area of something that is brighter or paler than its surroundings. not dark. (of a color) pale. The color example provided is ‘her eyes were light blue’.

Although dictionary definitions are supposed to be considered when terms are not defined, I believe we need to emphasize these definitions and by doing so, the actual words in the standard as well. In my experience, many designers and even inspectors, when queried as to why they believe it is acceptable to use or approve two colors very close in light reflectance, such as white on light gray for signs, state that one of them is “darker” than the other, and thus meets the standard, even though the standard does not include comparative terms. Even Aries Arditi in his article suggesting we abandon many of our signage standards strongly criticizes our current text referring to contrast because it is so vague as to be meaningless. As an example, he shows two barely contrasting light colors and maintains that one of them is “dark” since it is darker than the other and would therefore comply with our current standard.

Since I have included the dictionary references to light reflection by specifically referring to the technical term “light reflectance value” and its acronym LRV because that is commonly used in reference to contrast for signs, I have also included a definition for the term Light Reflectance Value and its acronym.

We are alone among many countries that now have accessibility standards that include signs, in not referring specifically to light reflectance values to judge contrast. Contrast is accepted almost universally as one of the two most important requirements for sign accessibility, along with character size. Although the difficulty in coming up with measurable standards that will meet the needs of a large percentage of vision impaired people is acknowledged as difficult due to the many combinations and variations in vision, and controversial as well, because of the desires of designers to have free rein with color and the burdens and difficulties with measuring LRV when it is not provided by manufacturers of the materials used in the signs, no other country has considered these to be insurmountable obstacles. Other than our lack of a measurable contrast standard, we have, as far as I can determine, the best, most detailed, and most intelligent signage standard in the world! At least we must define our terms.
Here are pdf references to articles about accessibility standards and contrast, including references to some specific standards as well as suggestions for our standard (see the report from NIBS, the National Institute of Building Sciences, Version 6, May 11, 2015, “Design Guideline for the Visual Environment”). Two of our delegates, Marsha Mazz and Eunice Noell-Waggoner were members of the committee who worked on the NIBS report and I made extensive comments to the committee after reading the earliest version, which appear to have been integrated to some extent in their final report and publication. They recommend a difference between the low and high LRV numbers for most signs of 50, and also refer to the requirement for 70 percent minimum contrast. This has added an authoritative U.S. source for the use of LRVs or at least a reference to them in the definitions, for our contrast standard.

Here are documents and articles that document the use of LRV to measure contrast in support of disabled access from around the world. The NIBS report is included, which refers to much of that material. There is an extensive article that mentions some of our efforts here, but documents that we do not have a measurable standard. There are two articles in German, which I did read in the original. The Google translation will be accurate if you do not read German, but you will need to break up the articles into several parts. One of those articles is especially interested in contrast for stair striping due to the high percentage of accidents on stairs.

https://nullbarriere.de/din32975.htm
https://www.pro-retina.de/system/files/artikel/broschure_barrierefrei_2019ua_1_0.pdf

Staff note: Light reflectance value is currently not used in the code. This term is in the Toji change 05-13, 07-08 and 07-19.

01-05 – 2021 Modification

Proponent: William Conner

Further revise as follows:

light reflectance value (LRV): A figure from 0-100 given to a surface that represents the amount of visible light it reflects when illuminated by a light source with pure white reflecting 100% of the light that hits it, and pure black absorbing all the light and reflecting none or 0. A measure of visible and usable light that is reflected from a surface when illuminated by a light source. A surface with an LRV of 100% reflects all the light striking it. A surface with an LRV of 0% reflects no light.
Reason: I support the definition and changes it relates to but believe the definition of LRV is not as accurate or clear as it could be. The proposed definition suggested there were surfaces with LRVs of 100% and 0% which there are not. The most pure whites have an LRV of around 85% and the best blacks around 5%

Committee Action: Disapproval 26-1-1

REPORT OF HEARING:

Modification (if any):

Committee Reason: The Communications task group needs additional time for development of LRV requirements.

01-05 – 2021 Ballot Comments

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01-05 – 2021 Public Comment 1

107.5

**Proponent:** Sharon Toji, representing the Communications Task Group

**Further revise as follows:**

**SECTION 107**

**DEFINITIONS**

107.5 Defined terms.

**dark:** when used in the standard in reference to contrast of adjoining finishes of architectural elements, dark means colors **Surfaces** with very low light reflectance values (LRV), approaching **pure** black.

**light:** when used in the standard in reference to contrast of adjoining finishes of architectural elements, light means colors **Surfaces** with very high light reflectance values (LRV), approaching **pure** white.

**light reflectance value (LRV):** A figure from 0-100 given to a surface that represents the amount of visible light it reflects when illuminated by a light source with pure white reflecting 100% of the light that hits it, and pure black absorbing all the light and reflecting none or 0. A value from 0 to 100 points representing the proportion of visible light reflected by a surface, weighted for the sensitivity to light of the human eye, with a value of 0 points for pure black and a value of 100 points for pure white. LRV is equivalent to CIE tristimulus value Y.

**International Commission on Illumination (CIE) tristimulus value Y:** The ratio of the luminance of a surface to that of a perfectly diffusing white surface, when illuminated and viewed under specific spectral and geometric conditions of measurement.

**REASON:** These modifications to the proposed definitions for the terms "light", "dark", and "light reflectance value (LRV)" result from discussions within the Communications Task Group and the Terminology Task Group. These consensus modifications were recommended for approval by the Communications Task Group at its July 26, 2023 meeting.

Users of the ICC A117.1 Standard include manufacturers and testing agencies who measure the color and appearance of materials. Metrics related to the luminance of materials, as perceived by the human eye, include the tristimulus Y value, the β (beta) reflectance or luminance factor, and the L* perceptual lightness value.

The Communications Task Group reviewed information shared with the International Sign Association in November 2022 by Steffen Jenkel, committee manager of the ISO/TC 59/SC 16 "Accessibility and usability of the built environment" committee, regarding ISO 21542:2021 and this committee electing to define the term "light reflectance value (LRV)" in terms of the International Commission on Illumination (CIE) tristimulus Y value:
“ISO 21542:2021 Building construction—Accessibility and usability of the built environment includes a definition for the term "light reflectance value (LRV)" that differs from what was formerly stated in ISO 21542:2011.”

Basis for the changes was the research made by the members of the working group responsible for the revision of ISO 21542:2011 and particularly the discussion with specialists in ergonomics as well as vision and colour from CIE (International Commission on Illumination). It was found that it is not correct to use the reflectance value in the contrast formula since the visual response of persons never increases linearly along with the reflectance value. At CIE, the Luminance factor, \( Y \), was introduced to correct this. This \( Y \) value, therefore, has also been introduced to ISO 21542 to formulas defining contrast. And the reflectance value has been corrected to luminance or luminance factor.»

In ISO 21542:2011, the term LRV is rather a simple averaged spectral reflectance throughout the visible range (in %). This means LRV is a physical characteristic of a surface of an object but not visually meaningful quantity. A visually meaning quantity needs a correction by spectral visual sensitivity function \( V(l) \). The CIE \( Y \) tristimulus value is the one resulted in this correction because \( y(l) \) is identical to \( V(l) \).

Source: Steffen Jenkel, Committee manager of ISO/TC 59/SC 16. Spanish Association for Standardization, UNE

Email communication dated November 15, 2022 with International Sign Association

Gregorio Feigusch and Isabella Tiziana Steffan are authors of two papers that discussed in detail contrast metrics in use by accessibility standards including ISO 21542:2011 and ISO 21542:2021 *fn1 *fn2. These persons provided written commentary shared with the Communications Task Group in support of defining the term "light reflectance value (LRV)" in terms of the CIE tristimulus \( Y \) value.

Additionally, Jim Leland, ASTM subcommittee chair of E12.01Terminology of ASTM Committee E12 on Color and Appearance provided comment shared with the Communications Task Group that also contributed to development of these modifications to the proposed definitions for the terms "light", "dark", and "light reflectance value (LRV)".

Footnotes


Committee Action on Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

01-05 – 2021 Public Comment 2
107.5

Proponent: Sharon Toji

Further revise as follows:

SECTION 107
DEFINITIONS

107.5 Defined terms.

dark: when used in the standard in reference to contrast of adjoining finishes of architectural elements, dark means colored surfaces with very low light reflectance values (LRV), approaching pure black.

light: when used in the standard in reference to contrast of adjoining finishes of architectural elements, light means colored surfaces with very high light reflectance values (LRV), approaching pure white.

light reflectance value (LRV): A figure from 0-100 given to a surface that represents the amount of visible light it reflects when illuminated by a light source with pure white reflecting 100% of the light that hits it, and pure black absorbing all the light and reflecting none or 0. A value from 0 to 100 points representing the proportion of visible light reflected by a surface, weighted for the sensitivity to light of the human eye, with a value of 0 points for pure black and a value of 100 points for pure white. LRV as used in this document is equivalent to CIE tristimulus value Y.

International Commission on Illumination (CIE) tristimulus value Y: The ratio of the luminance of a surface to that of a perfectly diffusing white surface, when illuminated and viewed under specific spectral and geometric conditions of measurement.
REASON: Clarifications to dark/light definition language. Clarifications to LRV definition language. Adopts terminology used by Illuminating Engineering Society (IES)

Committee Action on Public Comment 2:

REPORT OF HEARING:
Modification (if any):

Committee Reason:

01-05 Toji.doc

Committee Action for First Ballot:

REPORT OF HEARING:
Modification (if any):

Committee Reason:

Committee decision: D
Committee Vote at Meeting: 26-1-1
Committee Vote on Ballot: 40-3-2

REPORT OF HEARING:
Modification (if any):
Committee Reason: The Communications task group needs additional time for development of LRV requirements.

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Sharon Toji, Hearing Loss Association of America
Desired Action: Negative with comment
Modification:
Reason: These definitions are essential to the understanding of contrast. This modification represents a clarification to the original text.

BALLOT COMMENT 2- FIRST DRAFT:
Proponent: Glenn Dea, ISA
Desired Action: Negative with comment
Modification:
Reason: The ISA supports and participated in development of a consensus modification recommended for approval by the Communications Task Group at its July 26, 2023 meeting.

BALLOT COMMENT 3- FIRST DRAFT:
Proponent: Jessica Schrader, Society for Experiential Graphic Design
Desired Action: Negative with comment
Modification:
Reason: SEGD supports and participated in development of a consensus modification for approval by the Communications Task Group at its meeting held on July 26, 2023.

Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:

REPORT OF HEARING – FIRST DRAFT
Modification (if any):
Committee Reason:

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01-06 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

01-06 – 2021

107.5

Proponent: Kimberly Paarlberg, representing ICC

Revise as follows:

**SECTION 107
DEFINITIONS**

107.5 Defined terms.

**transfer device:** Equipment designed to facilitate the transfer of a person from a wheelchair or other mobility aide to and from an amusement ride seat.

**wheelchair charging area:** A clear floor area where people with disabilities can recharge their wheelchair batteries for wheelchairs or other mobility aide.

**wheelchair space:** A space for a single wheelchair or other mobility aide and its occupant.

**wheelchair space locations:** A space for a minimum of a single wheelchair or other mobility aide and the associated companion seating. Wheelchair space locations can contain multiple wheelchair spaces and associated companion seating.

**REASON:** The standard has been expanded to include other mobility devices. That should be addressed in the definitions.

Committee Action: Approved as Modified (Vote: 29-1-1)

REPORT OF HEARING:
Modification (if any):
Further modify:

**transfer device:** Equipment designed to facilitate the transfer of a person from a wheelchair or other mobility aide device to and from an amusement ride seat.

**wheelchair charging area:** A clear floor area where people with disabilities can recharge their batteries for wheelchairs or other mobility devices.

**wheelchair space:** A space for a single wheelchair or other mobility aide device and its occupant user.

**wheelchair space locations:** A space for a minimum of a single wheelchair or other mobility aide device and the associated companion seating. Wheelchair space locations can contain multiple wheelchair spaces and associated companion seating.

**Committee Reason:** The modification to change ‘aide’ to ‘device’ is to use the term more commonly found in the 2010 ADA standard. The modification to change ‘occupant’ to ‘user’ is a more appropriate term to use with both ‘wheelchairs’ and the other devices, such as scooters. The committee agreed that the changes in the definitions would help make it clear that the wheelchair spaces could be used by a variety of individuals. The sizes are set elsewhere in the standard. Expanding the definition to acknowledge other devices, which may be larger than the space required by the standard, does not mean that the standard will now require those spaces to be larger.

---

**BALLOT COMMENT 1 - FIRST DRAFT:**

**Proponent:** Dan Buuck representing NAHB

**Desired Action:** Negative with Comment

**Modification:**

**Reason:** I understand that this is “only” a definition change, but I am concerned that it may be interpreted to require larger clear floor spaces in some instances. The definition for “wheelchair charging area” states that it is an area where people _can_ recharge their device. Where a user wants to charge a larger wheeled mobility device but cannot make use of a standard clear floor space, it could lead to unnecessary complaints or lawsuits. It is important to note that the market will produce any size device for many types of public space and outdoor uses. I do not think it is this committee’s intent to provide space for all of these devices.

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**Committee Action for First Ballot:**

**REPORT OF HEARING:**

**Modification (if any):**
Committee Reason:

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REPORT OF HEARING:
Modification (if any):
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**transfer device:** Equipment designed to facilitate the transfer of a person from a wheelchair or other mobility aide device to and from an amusement ride seat.

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Committee Reason: The modification to change ‘aide’ to ‘device’ is to use the term more commonly found in the 2010 ADA standard. The modification to change ‘occupant’ to ‘user’ is a more appropriate term to use with both ‘wheelchairs’ and the other devices, such as scooters. The committee agreed that the changes in the definitions would help make it clear that the wheelchair spaces could be used by a variety of individuals. The sizes are set elsewhere in the standard. Expanding the definition to acknowledge other devices, which may be larger than the space required by the standard, does not mean that the standard will now require those spaces to be larger.

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*Reason:* I understand that this is “only” a definition change, but I am concerned that it may be interpreted to require larger clear floor spaces in some instances. The definition for ‘wheelchair charging area’ states that it is an area where people _can_ recharge their device. Where a user wants to charge a larger wheeled mobility device but cannot make use of a standard clear floor space, it could lead to unnecessary complaints or lawsuits. It is important to note that the market will produce any size device for many types of public space and outdoor uses. I do not think it is this committee’s intent to provide space for all of these devices.

Committee decision: AS/AM/D | Committee Vote at Meeting: | Committee Vote on Ballot: |

REPORT OF HEARING – FIRST DRAFT
Modification (if any):

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Committee decision: AS/AM/D | Committee Vote at Meeting: | Committee Vote on Ballot: |

FINAL ACTION:
Modification (if any):
Committee Reason:
No change were proposed for Chapter 2.
CHAPTER 3
BUILDING BLOCKS

03-02 – 2021 overview

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BC= Ballot Comment, PC= Public comment, Bold Comment number is proposed revision below

03-02 – 2021
304.2, 305.2, 403.2, 403.4

Proponent: Kimberly Paarlberg, representing International Code Council

Revise as follows:

CHAPTER 3
BUILDING BLOCKS

SECTION 302
FLOOR SURFACES

302.1 General. Floor surfaces shall be stable, firm, and slip resistant, and shall comply with Section 302. Changes in level in floor surfaces shall comply with Section 303.

SECTION 303
CHANGES IN LEVEL

303.1 General. Changes in level in floor surfaces shall comply with Section 303.

303.2 Vertical. Changes in level of \( \frac{1}{4} \) inch (6.4 mm) maximum in height shall be permitted to be vertical.
303.3 Beveled. Changes in level greater than 1/4 inch (6.4 mm) in height and not more than 1/2 inch (13 mm) maximum in height shall be beveled with a slope not steeper than 1:2.

303.4 Ramps. Changes in level greater than 1/2 inch (13 mm) in height shall be by a ramp complying with Section 405 or by a curb ramp complying with Section 406.

SECTION 304
TURNING SPACE

304.2 Floor surface. Floor surfaces of a turning space shall comply with Section 302. Changes in level shall not be permitted comply with Section 303 within the turning space.

SECTION 305
CLEAR FLOOR SPACE

305.2 Floor surfaces. Floor surfaces of a clear floor space shall comply with Section 302. Changes in level shall not be permitted comply with Section 303 within the clear floor space.

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

CHAPTER 4
ACCESSIBLE ROUTES

SECTION 403
WALKING SURFACES

403.2 Floor surface. Floor surfaces shall comply with Section 302. Changes in level shall comply with Section 303.

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

SECTION 404
DOORS, DOORWAYS AND GATES

404.2.3.1 Floor surface. The floor surface within the maneuvering clearances shall have a slope not steeper than 1:48 and shall comply with Section 302.

404.2.4 Thresholds. If provided, thresholds at doorways shall be 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 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 1/4 inch (6.4 mm).
404.3.5 **Thresholds.** Thresholds and changes in level at doorways shall comply with Section 404.2.4.

**SECTION 405**

**RAMPS**

405.4 **Floor surfaces.** Floor surfaces of ramp runs shall comply with Section 302.

405.7.1 **Slope.** Landings shall have a slope not steeper than 1:48 and shall comply with Section 302.

**SECTION 407**

**ELEVATORS**

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

**SECTION 408**

**LIMITED-USE/LIMITED-APPLICATION ELEVATORS**

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

**SECTION 409**

**PRIVATE RESIDENCE ELEVATORS**

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

**CHAPTER 5**

**GENERAL SITE AND BUILDING ELEMENTS**

**SECTION 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.

**SECTION 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.

**SECTION 504**

**STAIRWAYS**
504.4 Tread surface. Stair treads shall comply with Section 302 and shall have a slope not steeper than 1:48.

CHAPTER 8
SPECIAL ROOMS AND SPACES

SECTION 802
ASSEMBLY AREAS

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.

CHAPTER 10
RECREATIONAL FACILITIES

SECTION 1001
GENERAL

1001.2.2 Area of sport activity. Areas of sport activity shall be served by an accessible route and shall not be required to be accessible except as provided in this chapter. Within areas of sports activity exempted in this chapter, the floor and ground surfaces shall not be required to comply with Section 302. Within areas of sports activity exempted in this chapter, changes in level shall not be required to comply with Section 303.

SECTION 1003
RECREATIONAL BOATING FACILITIES

1003.2.1 Boat slips. An accessible route shall serve boat slips.

Exceptions:
1. Where an existing gangway or series of gangways is replaced or altered, an increase in the length of the gangway shall not be required to comply with Section 1003.2.
2. Gangways shall not be required to comply with the maximum rise specified in Section 405.6.
3. Where the total length of a gangway or series of gangways serving as part of a required accessible route is 80 feet (24 m) minimum, gangways shall not be required to comply with Section 405.2.
4. Where facilities contain fewer than 25 boat slips and the total length of the gangway or series of gangways serving as part of a required accessible route is 30 feet (9145 mm) minimum, gangways shall not be required to comply with Section 405.2.
5. Where gangways connect to transition plates, landings specified by Section 405.7 shall not be required.
6. Where gangways and transition plates connect and are required to have handrails, handrail extensions shall not be required. Where handrail extensions are provided on gangways or transition plates, the handrail extensions shall not be required to be parallel with the floor.
7. The cross slope specified in Sections 403.3 and 405.3 for gangways, transition plates, and floating piers that are part of accessible routes shall be measured in the static position.
8. Changes in level complying with Sections 303.3 and 303.4 shall be permitted on the surfaces of gangways and piers.
9. Cleats and other boat securement devices shall not be required to comply with Section 308.

SECTION 1007
MINIATURE GOLF FACILITIES

1007.2 Accessible routes. Accessible routes serving holes on miniature golf courses shall comply with Chapter 4.

Exception: Accessible routes located on playing surfaces of miniature golf holes shall be permitted to comply with the following:
1. Playing surfaces shall not be required to comply with Section 302.2.
2. Where accessible routes intersect playing surfaces of holes, a curb that is 1 inch (25 mm) maximum in height and 32 inches (815 mm) minimum in width shall be permitted.
3. A slope of 1:4 maximum shall be permitted for a rise of 4 inches (100 mm) maximum.
4. Ramp landing slopes specified by Section 405.7.1 shall be permitted to be 1:20 maximum.
5. Ramp landing length specified by Section 405.7.3 shall be permitted to be 48 inches (1220 mm) minimum.
6. Ramp landing size at a change in direction specified by Section 405.7.4 shall be permitted to be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum.
7. Handrails shall not be required along ramps located on the playing surface.

SECTION 1008
PLAY AREAS

1008.4.1 Accessible routes. Accessible routes serving play areas shall comply with Chapter 4 and Section 1008.4.1. Where accessible routes serve ground level play components, the vertical clearance shall be 80 inches (2030 mm) minimum in height.

Exceptions:
1. Where 20 or more elevated play components are provided, transfer systems complying with Section 1008.4.2 shall be permitted to be used as part of an accessible route for a maximum of 25 percent of the play components.
2. Where fewer than 20 elevated play components are provided, transfer systems complying with Section 1008.4.2 shall be permitted to be used as part of an accessible route.
3. Where transfer systems are provided, an elevated play component shall be permitted to connect to another elevated play component as part of an accessible route.
4. Accessible routes serving soft contained play structures shall be permitted to use transfer systems complying with Section 1008.4.2 as part of an accessible route.
5. Where the surface of the accessible route, clear floor spaces, or turning spaces serving water play components is submerged, complying with Sections 302, 403.3, 405.2, 405.3 and 1008.4.1.6 shall not be required.
6. Accessible routes serving water play components shall be permitted to use transfer systems complying with Section 1008.4.2 to connect elevated play components in water.

CHAPTER 11
DWELLING UNITS AND SLEEPING UNITS

SECTION 1104
TYPE B UNITS

1104.4.2 Changes in level. Changes in level shall comply with Section 303.  
Exception: Where exterior deck, patio or balcony surface materials are impervious, the finished exterior impervious surface shall be 4 inches (100 mm) maximum below the floor level of the adjacent interior spaces of the unit.

REASON: The purpose of this proposal is to ask the ICC A117.1 committee to address the conflicts with ‘changes in level’. As currently written, this could be read to include a ½” change in elevation or not. By saying ‘changes in level shall not be permitted’ we have heard the interpretation that this does not allow for tile grout lines or deck boards. This question also came up in the bathing work group regarding if a turning space could include the shower floor. If you can use a wheelchair to get into and out of the shower where you are parallel to the threshold, why would it be any harder for the T-shape turning space there than over a threshold at a doorway (see example below)? This needs to be addressed.

We also seem to be extremely inconsistent with the reference to Section 302 and 303 (which is referenced from 302). And we are inconsistent on saying the floor has to be level.
Committee Action:  Disapproval 23-0-2

REPORT OF HEARING:

Modification (if any):

Committee Reason: The proponent requested approval to allow for requirements for changes in elevation to be addressed by the Walking and Wheeled Surfaces Task Group in a consistent manner.

03-02 – 2021 Ballot Comments

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<td>Reason: Request approval. The work group has not met, so there is no new information for consideration. This proposal would at least provide consistency in the current standard.</td>
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Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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REPORT OF HEARING:
Modification (if any):

Committee Reason: The proponent requested approval to allow for requirements for changes in elevation to be addressed by the Walking and Wheeled Surfaces Task Group in a consistent manner.

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Kimberly Paarlberg, ICC
Desired Action: Negative with comment.
Modification:
Reason: Request approval. The work group has not met, so there is no new information for consideration. This proposal would at least provide consistency in the current standard.

| Committee decision: AS/AM/D  |
| Committee Vote at Meeting:  |
| Committee Vote on Ballot:  |

REPORT OF HEARING – FIRST DRAFT:
Modification (if any):
Committee Reason:

BALLOT COMMENT- SECOND DRAFT:
Proponent:
Desired Action:
Modification:
Reason:

| Committee decision: AS/AM/D  |
| Committee Vote at Meeting:  |
| Committee Vote on Ballot:  |

FINAL ACTION:
Modification (if any):
Committee Reason:
03-03 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

03-03 – 2021

304.3.1, 304.3.1.1, 304.3.1.1.1, 304.3.1.2, 304.3.1.2.1, 304.3.2, 304.3.2.1, 304.3.2.1.1, 304.3.2.2, 304.3.2.2.1, 305.3, 305.3.1, 305.3.2, 403.5.1, 403.5.2, 403.5.2.1, 403.5.2.2, 403.5.3, 403.5.3.1, 403.5.3.2, 403.5.4, 403.5.4.1, 403.5.4.2, Table 404.2.3.2, Table 404.2.3.3, Table 404.2.3.4, 404.2.3.5, 404.2.5, 409.4.1, 409.4.1.1, 409.4.1.2, 410.5.1, 410.5.1.1, 410.5.1.2, 503.3.2, 503.3.2.1, 503.3.2.2, 608.2.1.2, 608.2.1.2.1, 608.2.1.2.2, 802.4, 802.4.1, 802.4.2, 802.5.1, 802.7.2, 805.2.2, 805.2.2.1, 805.2.2.2, 1007.3.2, 1007.3.2.1, 1007.3.2.2, 1009.2.3.1, 1009.2.3.2

Proponent: Marsha K. Mazz, representing United Spinal Association

Revise as follows:

SECTION 304
TURNING SPACE

304.1 General. A turning space shall comply with Section 304.

304.2 Floor surface. Floor surfaces of a turning space shall comply with Section 302. Changes in level shall not be permitted within the turning space.

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

304.3 Size. Turning spaces shall comply with Section 304.3.1 or 304.3.2.

   304.3.1 Circular space.
304.3.1.1 New buildings and facilities. In new buildings and facilities, the turning space shall be a circular space with a 67-inch (1700 mm) minimum diameter.

304.3.1.1 Overlap. Turning spaces shall be permitted to include knee and toe clearance complying with Section 306. Where the turning space includes knee and toe clearances under an obstruction, the overlap shall comply with all of the following:
1. The depth of the overlap shall not be more than 10 inches (255 mm), and
2. The depth shall not exceed the depth of the knee and toe clearances provided, and
3. The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1.1.1.

304.3.1.2 Existing buildings and facilities. In existing buildings and facilities, the turning space shall be a circular space with a 60-inch (1525 mm) minimum diameter.

304.3.1.2.1 Overlap. Turning spaces shall be permitted to include knee and toe clearance complying with Section 306.

304.3.2 T-Shaped space.
304.3.2.1 New buildings and facilities. In new buildings and facilities, the turning space shall be a T-shaped space complying with one of the following:

1. A T-shaped space, clear of obstruction, that fits within an area 68 inches (1725 mm) wide and 60 inches (1525 mm) deep, with two arms and one base that are all 36 inches (915 mm) minimum in width. Each arm shall extend 16 inches (405 mm) minimum from each side of the base located opposite the other, and the base shall extend 24 inches (610 mm) minimum from the arms. At the intersection of each arm and the base, the interior corners shall be chamfered for 8 inches (205 mm) minimum along both the arm and along the base.

![FIGURE 304.3.2 304.3.2.1(A) T-SHAPED TURNING SPACE NEW BUILDINGS – OPTION 1](image)

2. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms 38 inches (965 mm) minimum in width and a base 42 inches (1065 mm) minimum in width. Each arm shall extend 11 inches (280 mm) minimum from each side of the base, located opposite the other, and the base shall extend 22 inches (560 mm) minimum from each arm.

![FIGURE 304.3.2 304.3.2.1 (B) T-SHAPED TURNING SPACE](image)
NEW BUILDINGS – OPTION 2

3. A T-shaped space, clear of obstruction, 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms and one base 40 inches (1015 mm) minimum in width. Each arm shall extend 12 inches (305 mm) minimum from each side of the base and the base shall extend 20 inches (510 mm) minimum from each arm.

FIGURE 304.3.2.1 (C)  
T-SHAPED TURNING SPACE
NEW BUILDINGS – OPTION 3

304.3.2.1 304.3.2.1.1 Overlap. Turning spaces shall be permitted to include knee and toe clearance complying with Section 306 of either the base or one arm. For Option 1, the base or arm is the portion beyond the chamfer.

FIGURE 304.3.2.1 304.3.2.1.1  
T-SHAPED TURNING SPACE
NEW BUILDINGS- OVERLAP

304.3.2.2 Existing buildings and facilities. In existing buildings and facilities, the turning space shall be a T-shaped space within a 60-inch (1525 mm) minimum square, with arms and base 36 inches (915 mm) minimum in width. Each arm of the T shall be clear of obstructions 12 inches
(305 mm) minimum in each direction, and the base shall be clear of obstructions 24 inches (610 mm) minimum.

**FIGURE 304.3.2.2**
T-SHAPED TURNING SPACE  
EXISTING BUILDINGS

304.3.2.2.1 Overlap. Turning spaces shall be permitted to include knee and toe clearance complying with Section 306 only at the end of either the base or one arm.

**FIGURE 304.3.2.2.1**
T-SHAPED TURNING SPACE  
EXISTING BUILDINGS – OVERLAP

SECTION 305  
CLEAR FLOOR SPACE

305.3 Size.  
305.3.1 New buildings and facilities. In new buildings and facilities, the clear floor space shall be 52 inches (1320 mm) minimum in length and 30 inches (760 mm) minimum in width.
305.3.2 Existing buildings and facilities. In existing buildings and facilities, the clear floor space shall be 48 inches (1220 mm) minimum in length and 30 inches (760 mm) minimum in width.

SECTION 403
WALKING SURFACES

403.5.1 General. The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

Exceptions:
1. In new buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.
2. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.
2.3. The clear width of an exterior accessible route located within seating areas shall be permitted to be 36 inches (915 mm) minimum.
3.4. The clear width of an exterior ramp shall complying with Section 405.5 shall not be required to comply with this section.
Figure 403.5.1(A) Clear Width of an Accessible Route - New Buildings - Interior

Figure 403.5.1(B) Clear Width of an Accessible Route - New Buildings - Exterior

Figure 403.5.1(C) Clear Width of an Accessible Route - Existing Buildings - Interior

Figure 403.5.1(D) Clear Width of an Accessible Route - Existing Buildings - Exterior

403.5.2 Clear width at 180-degree turn.
403.5.2.1 New buildings and facilities. In new building and facilities, where an accessible route makes a 180-degree turn around an object that is equal to or greater than 52 inches (1320 mm) in width, the clear widths in the turn shall comply with Section 403.5.1. Where an accessible route makes a 180-degree turn around an object that is less than 52 inches
(1320 mm) inches in width, the clear widths approaching the turn, during the turn and leaving the turn, shall be one of the following sets of dimensions:

1. Approaching width is 36 inches (915 mm) minimum, during width is 60 inches (1525 mm) minimum, and leaving width is 36 inches (915 mm) minimum.
2. Approaching width is 42 (1065 mm) inches minimum, during width is 48 inches (1220 mm) minimum, and leaving width is 42 (1065 mm) inches minimum.
3. Approaching width is 43 inches (1090 mm) minimum, during width is 43 inches (1090 mm) minimum, and leaving width is 43 inches (1090 mm) minimum.

Figure 403.5.2 403.5.2.1(A) Clear Width at 180-degree Turn – New Buildings - Option 1
403.5.2.2 Existing buildings and facilities. In existing buildings and facilities, where an accessible route makes a 180-degree turn around an object that is less than 48 inches (1220 mm) in width, clear widths shall be 42 inches (1065 mm) minimum approaching the turn, 48 inches (1220 mm) minimum during the turn, and 42 inches (1065 mm) minimum leaving the turn.

Exception: This section shall not apply where the clear width during the turn is 60 inches (1525 mm) minimum.
403.5.3 Clear width at 90-degree turn.

403.5.3.1 New buildings and facilities. In new buildings and facilities, where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be one of the following sets of dimensions:

1. Both legs of the turn shall be 40 inches (1015 mm) minimum in width. The width of each leg of the turn shall be maintained for 28 inches (710 mm) minimum from the inner corner.
2. Where the interior corners of the turn are chamfered for 8 inches minimum (205 mm) along both walls, both legs of the turn shall be 36 inches (915 mm) minimum in width.
3. Where one leg of the turn is 42 inches (1065 mm) minimum in width, the other shall be permitted to be 38 inches (965 mm) minimum in width.
4. Where one leg of the turn is 44 inches (1120mm) minimum in width, the other shall be permitted to be 36 inches (915 mm) minimum in width.

Exceptions:
1. Where an accessible route makes a 90-degree turn at doors, doorways and gates complying with Section 404.2.3, the route shall not be required to comply with this section.
2. Where an accessible route makes a 90-degree turn at an elevator or platforms lifts complying with Sections 407 through 410, the accessible route shall not be required to comply with this section.

Figure 403.5.3 403.5.3.1(A) Clear Width at 90-degree Turn - New Buildings - Option 1
403.5.3.2 Existing buildings and facilities. In existing buildings and facilities, where an accessible route makes a 90 degree turn the clear widths approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum.
403.5.4 Passing space.

403.5.4.1 New buildings and facilities. In new buildings and facilities, an accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2.1, provided the base and arms of the T-shaped space extend 52 inches (1320 mm) minimum beyond the intersection.
403.5.2 Existing buildings and facilities. In existing buildings and facilities, an accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2, provided the base and arms of the T-shaped space extend 48 inches (1220 mm) minimum beyond the intersection.
SECTION 404
DOORS, DOORWAYS AND GATES

404.2.3.2 Swinging doors and gates. Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.3.2.

TABLE 404.2.3.2—MANEUVERING CLEARANCES AT MANUAL SWINGING DOORS AND GATES

<table>
<thead>
<tr>
<th>TYPE OF USE</th>
<th>MINIMUM MANEUVERING CLEARANCES</th>
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<tr>
<td>Approach Direction</td>
<td>Door or Gate Side</td>
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<tr>
<td>From front</td>
<td>Pull</td>
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<tr>
<td>From front</td>
<td>Push</td>
</tr>
<tr>
<td>From hinge side</td>
<td>Pull</td>
</tr>
<tr>
<td>From hinge side</td>
<td>Pull</td>
</tr>
<tr>
<td>From hinge side</td>
<td>Push</td>
</tr>
<tr>
<td>From latch side</td>
<td>Pull</td>
</tr>
<tr>
<td>From latch side</td>
<td>Push</td>
</tr>
</tbody>
</table>

1. Add 6 inches (150 mm) if closer and latch provided.
2. Add 6 inches (150 mm) if closer provided.
3. Add 12 inches (305 mm) beyond latch if closer and latch are provided.
4. Beyond hinge side.
5. In existing buildings and facilities, the dimension perpendicular to the door or gate for the front direction on the push side shall be 48 inches (1220 mm) minimum.

Figure 403.5.4.2(B) Passing Space–Existing Buildings–T-turn Option

Figure 404.2.3.2(A) Maneuvering Clearances at Manual Swinging Doors - Front Approach - Pull Side
404.2.3.3 Sliding and folding doors. Sliding doors and folding doors shall have maneuvering clearances complying with Table 404.2.3.3.

**TABLE 404.2.3.3—MANEUverING CLEARANCES AT SLIDING AND FOLDING DOORS**

<table>
<thead>
<tr>
<th>Approach Direction</th>
<th>MINIMUM MANEUverING CLEARANCES</th>
<th>Parallel to Doorway (beyond stop or latch side unless noted)</th>
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<tr>
<td></td>
<td><strong>Perpendicular to Doorway</strong></td>
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<tr>
<td>From front</td>
<td>52 inches (1320 mm)</td>
<td>0 inches (0 mm)</td>
</tr>
<tr>
<td>From nonlatch side</td>
<td>42 inches (1065 mm)</td>
<td>22 inches (560 mm)</td>
</tr>
<tr>
<td>From latch side</td>
<td>42 inches (1065 mm)</td>
<td>24 inches (610 mm)</td>
</tr>
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</table>
1. Beyond pocket or hinge side.
2. In existing buildings and facilities, the dimension perpendicular to the door for the front direction shall be 48 inches (1220 mm) minimum.

![Figure 404.2.3.3(A) Maneuvering Clearance at Sliding and Folding Doors - Front Approach - New Buildings](image1)

![Figure 404.2.3.3(B) Maneuvering Clearance at Sliding and Folding Doors - Front Approach - Existing Buildings - Footnote 2](image2)

*Note: Renumber Figure 404.2.3.3(C) and (D)*

### 404.2.3.4 Doorways without doors or gates.
Doorways without doors or gates that are less than 36 inches (915 mm) in width shall have maneuvering clearances complying with Table 404.2.3.4.

**TABLE 404.2.3.4—MANEUVERING CLEARANCES FOR DOORWAYS WITHOUT DOORS OR GATES**

<table>
<thead>
<tr>
<th>Approach Direction</th>
<th>MINIMUM MANEUVERING CLEARANCES Perpendicular to Doorway</th>
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<tbody>
<tr>
<td>From front</td>
<td>52 inches (1320 mm)¹</td>
</tr>
<tr>
<td>From side</td>
<td>42 inches (1065 mm)</td>
</tr>
</tbody>
</table>

¹. In existing buildings and facilities the dimension perpendicular to the doorway for the front direction shall be 48 inches (1220 mm) minimum.
404.2.3.5 Recessed doors and gates. Where any obstruction within 18 inches (455 mm) of the latch side of a doorway projects more than 8 inches (205 mm) beyond the face of the door or gate, measured perpendicular to the face of the door or gate, maneuvering clearances for a forward approach shall be provided.
Figure 404.2.3.5(B) Recessed Doors and Gates – New Buildings - Push Side

Figure 404.2.3.5(C) Recessed Doors and Gates – New Buildings - Push Side - Provided with Both Closer and Latch

Figure 404.2.3.5(D) Recessed Doors and Gates – Existing Buildings – Pull Side
404.2.5 Two doors or gates in series. Distance between two hinged or pivoted doors or gates in series shall be 48 inches (1220 mm) minimum plus the width of any door or gate swinging into the space. The space between the doors and gates shall provide a turning space.
(a) Figure 404.2.5(A) Two Doors or Gates in a Series - New Buildings

(b) Figure 404.2.5(B) Two Doors or Gates in a Series - New Buildings
Figure 404.2.5(C) Two Doors or Gates in a Series - New Buildings

Figure 404.2.5(D) Two Doors or Gates in a Series - Existing Buildings
SECTION 409
PRIVATE RESIDENCE ELEVATORS

409.4 Elevator car requirements. Elevator cars shall comply with Section 409.4.

409.4.1 Inside dimensions.

409.4.1.1 New buildings. In new buildings, elevator cars shall provide a clear floor area 36 inches (915 mm) minimum in width and 52 inches (1320 mm) minimum in depth.

409.4.1.2 Existing buildings. In existing buildings, elevator cars shall provide a clear floor area 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in depth.
**Exception:** In existing buildings, elevator cars shall be permitted to provide a clear floor area 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in depth where the installation of a car complying with Section 409.4.1 would result in the removal or rearrangement of existing walls, partitions, enclosures, or stairs.

**SECTION 410**
**PLATFORM LIFTS**

410.5.1 Lifts with single door or doors on opposite ends.

410.5.1.1 New buildings. In new buildings, platform lifts with a single door or doors on opposite ends shall provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 52 inches (1320 mm) minimum.

**Exceptions:**
1. Incline platform lifts with passenger restraining arms, shall be permitted to provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 48 inches (1220 mm) minimum.
2. In existing buildings, platform lifts with a single door or with doors on opposite ends shall be permitted to provide a clear floor depth of 48 inches (1220 mm) minimum where compliance with the platform depth specified in Section 410.5.1 would result in the removal or rearrangement of existing walls, partitions, enclosures, or stairs.

410.5.1.2 Existing buildings. In existing buildings, platform lifts with a single door or with doors on opposite ends shall provide a clear floor width of 36 inches (915 mm) minimum and a clear floor depth of 48 inches (1220 mm) minimum.

410.5.2 Platform lifts with doors on adjacent sides.

410.5.2.1 New buildings. In new buildings, platform lifts with doors on adjacent sides shall provide a clear floor width of 42 inches (1065 mm) minimum and a clear floor depth of 60 inches (1525 mm) minimum.

**Exception.** In existing buildings, platform lifts with doors on adjacent sides shall be permitted to provide a clear floor platform depth of 60 inches (1525 mm) where compliance with the platform depth specified in Section 410.5.2 would result in the removal or rearrangement of existing walls, partitions, enclosures, or stairs.

410.5.2.2 Existing buildings. In existing buildings, platform lifts with doors on adjacent sides shall be permitted to provide a clear floor width of 36 inches (915 mm) and a clear floor depth of 60 inches (1525 mm).

**SECTION 503**
**PASSENGER LOADING ZONES**

503.3 Access aisle. Passenger loading zones shall have an adjacent access aisle complying with Section 503.3.
503.3.1 Location. Access aisles shall adjoin an accessible route. Access aisles shall not overlap vehicular ways.

503.3.2 Width.

503.3.2.1 New buildings and facilities. In new buildings and facilities, aisles serving vehicle pull-up spaces shall be 67 inches (1700 mm) minimum in width.

503.3.2.2 Existing buildings and facilities. In existing buildings and facilities, access aisles serving vehicle pull-up spaces shall be 60 inches (1525 mm) minimum in width.

SECTION 608
SHOWER COMPARTMENTS

608.2.1.2 Clearance.
608.2.1.2.1 New buildings and facilities. In new buildings and facilities, a clearance of 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment. The length of the clear floor space shall
be measured perpendicular from either the control wall or from 4 inches (100 mm) behind the control wall.

608.2.1.2.2 Existing buildings and facilities. In existing buildings and facilities, a clearance of 48 inches (1220 mm) minimum in length measured perpendicular from the control wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

SECTION 802
ASSEMBLY AREAS

802.4 Depth.

802.4.1 New buildings and facilities. In new buildings and facilities, where a wheelchair space is entered from the front or rear, the wheelchair space shall be 52 inches (1320 mm) minimum in depth. Where a wheelchair space is only entered from the side, the wheelchair space shall be 60 inches (1525 mm) minimum in depth.

802.4.2 Existing buildings and facilities. In existing buildings and facilities, where a wheelchair space is entered from the front or rear, the wheelchair space shall be 48 inches (1220 mm) minimum in depth. Where a wheelchair space is only entered from the side, the wheelchair space shall be 60 inches (1525 mm) minimum in depth.
802.5 Approach. Wheelchair spaces shall adjoin an accessible route. The accessible route shall not overlap a wheelchair space.

802.5.1 Overlap. The width of a wheelchair space shall not overlap the required width of an aisle. Exception: In new buildings, the depth of a wheelchair space shall be permitted to overlap the required aisle width a maximum of 4 inches (100 mm).

802.7 Companion seat. A companion seat, complying with Section 802.7, shall be provided beside each wheelchair space.
802.7.1 **Companion seat type.** The companion seat shall be equivalent in size, quality, comfort and amenities to the seats in the immediate area to the wheelchair space location. Companion seats shall be permitted to be moveable.

802.7.2 **Companion seat alignment.** In row seating, the companion seat shall be located to provide shoulder alignment with the wheelchair space occupant. The shoulder of the wheelchair space occupant is considered to be 36 inches (915 mm) or more from the front and 12 inches (305 mm) or more from the rear of the wheelchair space. The floor surface for the companion seat shall be at the same elevation as the wheelchair space floor surface.

**Exception:** Companion seat alignment shall not be required in tiered seating that includes dining surfaces or work surfaces.

![Companion Seat Alignment - Elevation](image1)

**Figure 802.7.2(A) Companion Seat Alignment – Elevation**

![Companion Seat Alignment - Front or Rear Approach - Existing Buildings](image2)

**Figure 802.7.2(B) Companion Seat Alignment – Front or Rear Approach – Existing Buildings**
SECTION 805
TRANSPORTATION FACILITIES

805.2.2 Dimensions.

805.2.2.1 New buildings and facilities. In new buildings and facilities, bus stop boarding and alighting areas shall have a 100-inch (2540 mm) minimum clear length, measured perpendicular to the curb or vehicle roadway edge, and a 60-inch (1525 mm) minimum clear width, measured parallel to the vehicle roadway.

805.2.2.2 Existing buildings and facilities. In existing buildings and facilities, bus stop boarding and alighting areas shall have a 96-inch (2440 mm) minimum clear length, measured perpendicular to the curb or vehicle roadway edge, and a 60-inch (1525 mm) minimum clear width, measured parallel to the vehicle roadway.

SECTION 1007
MINIATURE GOLF FACILITIES

1007.3.2 Golf club reach range area.

1007.3.2.1 New buildings and facilities. In new buildings and facilities, areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor space 36 inches (915 mm) minimum in width and 52 inches (1320 mm) minimum in length having a running slope not steeper than 1:20. The clear floor space shall be served by an accessible route.

1007.3.2.2 Existing buildings and facilities. In existing buildings and facilities, areas within holes where golf balls rest shall be within 36 inches (915 mm) maximum of a clear floor space 36 inches (915 mm) minimum in width and 48 inches (1220 mm) minimum in length having a running slope not steeper than 1:20. The clear floor space shall be served by an accessible route.
SECTION 1009
SWIMMING POOLS, WADING POOLS, HOT TUBS AND SPAS

1009.2.3 Clear deck space.

**1009.2.3.1 New buildings and facilities.** In new buildings and facilities, on the side of the seat opposite the water, a clear deck space shall be provided parallel with the seat. The space shall be 36 inches (915 mm) minimum in width and shall extend forward 52 inches (1320 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck space shall have a slope not steeper than 1:48.

**1009.2.3.2 Existing buildings and facilities.** In existing buildings and facilities, on the side of the seat opposite the water, a clear deck space shall be provided parallel with the seat. The space shall be 36 inches (915 mm) minimum in width and shall extend forward 48 inches (1220 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck space shall have a slope not steeper than 1:48.
REASON: The purpose of this proposal is to remove criteria for differing space requirements in “existing” buildings versus new construction for the following reasons:

1. Section 301.5 *Compliance with accessibility* of the 2018 International Existing Building Code (IEBC) references the 2009 ICC A117.1 and Section 306.2 of the 2021 Edition references the 2017. Both these editions permit application of the older space requirements in existing facilities. If the Committee wishes to allow the use of older standards for accessibility in existing buildings and facilities, the IEBC is the appropriate location for such a requirement, not the technical standard. The IEBC presents the opportunity to allow more leeway depending on the size of the work area in relation to the aggregate area of the building.

2. It is highly unlikely that the next edition of the ICC A117.1 will be published in time to be referenced by the 2024 IBC or IEBC. Consequently, interested parties will have 10 years to adjust to the new space requirements.

3. With the duplicate material for new and existing buildings, the ICC A117.1 has become unwieldy and less easily comprehensible.

4. Since its first publication, the IEBC has provided that where compliance is “technically infeasible”, alterations must “provide access to the maximum extent technically feasible”. There is no logical reason to allow *all* alterations to provide spaces that are smaller than research shows are necessary to accommodate a meaningful range of people who use
wheelchairs if they can comply with the accessibility requirements applicable to new construction or, as is permitted, if they can come close to those requirements without encountering technical infeasibility.

Except for the change to Exceptions 3 and 4 of Section 403.5.1, 409.4, 410.5, and Section 802.5.1, all of the changes proposed eliminate the criteria for existing buildings and facilities and editorially revise the criteria for new construction to be applicable to all construction.

Our proposed revisions to Exceptions 3 and 4 of Section 403.5.1 are intended to be editorial changes that are more consistent with the format for exceptions used in the Standard.

Proposed changes to Sections 409.4 Private Residence Elevators and 410.5 Platform Lifts allow the use of smaller car sizes and platforms only under certain conditions which we anticipate will be common in alterations that are not as extensive as most level 3 alteration as described in the International Existing Building Code. By limiting the application of the exception to these conditions, we believe we strike a balance between cost and benefit. Also, while many will, not all inspectors would interpret these conditions as constituting technical infeasibility.

The proposed change to Section 802.5.1 is made because it was necessary to distinguish between encroachments by the “width” and “length” of a wheelchair space into the required aisle width.

Sections containing provisions for existing elements that are unaffected by this change: 107.5, 201, 308.3, 404.2.4, 404.2.9, 405.2, 407.2.1, 407.2.2, 407.3.2, 407.3.3, 407.3.5, 407.4.1, 407.4.6, 407.4.7, 408.4.1, 608.6, 805.5.1, 805.9, 904.3, 1003.2.1, 1003.3.1, 1006.2, and 1102.5.

Committee Action: Disapproved (Vote: 19-12-2)

REPORT OF HEARING:
Modification (if any):

Committee Reason: There has not been sufficient experience with the new dimensions on actual construction to determine impact. Deleting the option for existing building to use the 2009 ICC A117.1 and ADA numbers is not appropriate until a change in the IEBC on how to apply accessibility in existing buildings.

03-03 – 2021 Ballot Comments

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<td><strong>Desired Action:</strong> Negative with Comment</td>
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<tr>
<td><strong>Modification:</strong></td>
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<td><strong>Reason:</strong> The same criteria should apply in both new construction and alterations. Extent of compliance should be determined as appropriate for a specific situation on a case-by-case basis before it is assumed that a lesser requirement is necessary.</td>
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BALLOT COMMENT 2- FIRST DRAFT:
Proponent: Edward Steinfeld representing RESNA
Desired Action: Negative with Comment
Modification:
Reason: Some on the committee argued that there has not been enough experience with the new dimensional requirements to determine the impact, but they gave no evidence that this was the case. Experience with even larger dimensions in universal design practice shows that there is no serious problem with implementing the new dimensions in existing buildings undergoing substantial renovation. Another argument was that we should wait for changes in the IEBC. This is not a good argument since the IEBC already has provisions for addressing situations where complying with new construction requirements is not feasible. The research behind the new requirements is more thorough than any other requirements in the standard. There was no reason for this exception in the first place due to the process for exceptions already embedded in the IEBC. It has already been 5 years since the new requirements were added. Since the IEBC requires existing buildings that are substantially changed to comply with new construction requirements there should have been plenty of evidence already if compliance was a problem. None was brought forward.

BALLOT COMMENT 3- FIRST DRAFT:
Proponent: Marsha Mazz representing United Spinal Association
Desired Action: Negative with Comment
Modification:
Reason: The committee's reasons for disapproving this proposal were:
(1) that there has not been sufficient experience with the new dimensions on actual construction to determine impact; and
(2) deleting the option for existing building to use the 2009 ICC A117.1 and ADA numbers is not appropriate until a change in the IEBC on how to apply accessibility in existing buildings.
RESPONSE:
Maintaining the old requirements in the standard signals a lack of confidence in the science supporting the new standards. No provisions in the standard are as well supported by empirical research as these new requirements. Regarding the committees' reasons listed above:
(1) This proposal was heard early in the cycle. By now, it should be clear to everyone that our observation in the reason statement that "it is highly unlikely that the next edition of the ICC A 117.1 will be published in time to be referenced by the 2024 IBC or IEBC" is likely to be true given our current pace. Consequently, interested parties will have 10 years to adjust to the new space requirements.
(2) Reason #2 above makes no sense. There is no rationale offered for an expectation that the IEBC would treat accessibility differently from other requirements. Section306.7 Alterations already permits different solutions where full compliance is "technically infeasible". Why should an entity be permitted a 48-inch long clear floor space if providing one that nearly complies with the new 52-inch long requirement is technically feasible?

BALLOT COMMENT 4- FIRST DRAFT:
Proponent: Jake Pauls
Desired Action: Negative with comment
Modification:
Reason: This is a difficult, complex matter mostly because of the related, but apparently not sufficiently helpful International Existing Buildings Code, at least as it is adopted (or not adopted). My view is that resolution of the complex nature of the relationship of A117.1 and the IEBC will take more-helpful effort of those who voted for "disapproval" action on the proposal and that is more likely to be accomplished with an overturning of the Committee action and a clearer re-examination of the matter in the second phase of Committee consideration when a clearer picture is available of how A117.1 and the IEBC can best co-exist. This view is based on multiple re-readings of my two pages of notes taken at the time of the A117 Committee as well as a detailed rehearing of the entire debate by the Committee.

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Vote at Meeting: 19-12-2
Committee Vote on Ballot: 36-4-1

REPORT OF HEARING:

Modification (if any):

Committee Reason: There has not been sufficient experience with the new dimensions on actual construction to determine impact. Deleting the option for existing building to use the 2009 ICC A117.1 and ADA numbers is not appropriate until a change in the IEBC on how to apply accessibility in existing buildings.

BALLOT COMMENT 1 - FIRST DRAFT:

Proponent: Rex Pace representing HUD
Desired Action: Negative with Comment
Modification:

Reason: The same criteria should apply in both new construction and alterations. Extent of compliance should be determined as appropriate for a specific situation on a case-by-case basis before it is assumed that a lesser requirement is necessary.

BALLOT COMMENT 2 - FIRST DRAFT:

Proponent: Edward Steinfeld representing RESNA
Desired Action: Negative with Comment
Modification:

Reason: Some on the committee argued that there has not been enough experience with the new dimensional requirements to determine the impact, but they gave no evidence that this was the case. Experience with even larger dimensions in universal design practice shows that there is no serious problem with implementing the new dimensions in existing buildings undergoing substantial renovation. Another argument was that we should wait for changes in the IEBC. This is not a good argument since the IEBC already has provisions for addressing situations where complying with new construction requirements is not feasible. The research behind the new requirements is more thorough than any other requirements in the standard. There was no reason for this exception in the first place due to the process for exceptions already embedded in the IEBC. It has already been 5 years since the new requirements were added. Since the IEBC requires existing buildings that are substantially changed to comply with new construction requirements there should have been plenty of evidence already if compliance was a problem. None was brought forward.

BALLOT COMMENT 3 - FIRST DRAFT:

Proponent: Marsha Mazz representing United Spinal Association
Desired Action: Negative with Comment
Modification:

Reason: The committee's reasons for disapproving this proposal were:
(1) that there has not been sufficient experience with the new dimensions on actual construction to determine impact; and
(2) deleting the option for existing building to use the 2009 ICC A117.1 and ADA numbers is not appropriate until a change in the IEBC on how to apply accessibility in existing buildings.
**RESPONSE:**

Maintaining the old requirements in the standard signals a lack of confidence in the science supporting the new standards. No provisions in the standard are as well supported by empirical research as these new requirements. Regarding the committees’ reasons listed above:

1. This proposal was heard early in the cycle. By now, it should be clear to everyone that our observation in the reason statement that "It is highly unlikely that the next edition of the ICC A 117.1 will be published in time to be referenced by the 2024 IBC or IEBC" is likely to be true given our current pace. Consequently, interested parties will have 10 years to adjust to the new space requirements.

2. Reason #2 above makes no sense. There is no rationale offered for an expectation that the IEBC would treat accessibility differently from other requirements. Section 306.7 Alterations already permits different solutions where full compliance is "technically infeasible". Why should an entity be permitted a 48-inch long clear floor space if providing one that nearly complies with the new 52-inch long requirement is technically feasible?

**BALLOT COMMENT 4 - FIRST DRAFT:**

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Reason: This is a difficult, complex matter mostly because of the related, but apparently not sufficiently helpful *International Existing Buildings Code*, at least as it is adopted (or not adopted). My view is that resolution of the complex nature of the relationship of A117.1 and the IEBC will take more-helpful effort of those who voted for "disapproval" action on the proposal and that is more likely to be accomplished with an overturning of the Committee action and a clearer re-examination of the matter in the second phase of Committee consideration when a clearer picture is available of how A117.1 and the IEBC can best co-exist. This view is based on multiple re-readings of my two pages of notes taken at the time of the A117 Committee as well as a detailed rehearing of the entire debate by the Committee.
03-04 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

03-04 – 2021

304.3, 305.2, 404.2.3.1, 405.7.1, 406.2.1, 406.3.1, 502.5, 503.4, 802.2, 805.5.1, 1002.4.2, 1009.2.2, 1009.2.3.1, 1009.2.3.2, 1009.4.1, 1009.5.2

**Proponent:** Marsha Mazz, representing United Spinal Association

**Revise as follows:**

**SECTION 304**

**TURNING SPACE**

304.3 **Size and slope.** Turning spaces shall comply with Section 304.3.1 or 304.3.2. Circular turning spaces shall not have slopes steeper than 1:48 measured along the diameter and along a line 90 degrees to the diameter. The base and arms of T-turns shall not have slopes steeper than 1:48 measured along the length and width.

**SECTION 305**

**CLEAR FLOOR SPACE**

305.2 **Floor surfaces.** Floor surfaces of a clear floor space shall comply with Section 302. Changes in level shall not be permitted within the clear floor space.

**Exception:** Running and cross slopes not steeper than 1:48 shall be permitted.

**SECTION 404**

**DOORS, DOORWAYS AND GATES**

404.2.3.1 **Floor surface.** The floor surface within the maneuvering clearances shall have a running and cross slopes not steeper than 1:48 and shall comply with Section 302.

**SECTION 405**

**RAMPS**
405.7.1 **Slope.** Landings shall have running and cross slopes a slope not steeper than 1:48 and shall comply with Section 302.

**SECTION 406**
**CURB RAMPS AND BLENDED TRANSITIONS**

406.2.1 **Landings.** A landing 48 inches (1220 mm) minimum by 48 inches (1220 mm) minimum shall be provided at the top of a curb ramp. The landing shall be permitted to overlap pedestrian routes and clear spaces other walking surfaces. Where the landing is constrained at the back-of-sidewalk, the landing shall be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum. The 60-inch (1525 mm) dimension shall be provided in the direction of the curb ramp run. The slope running and cross slopes of landings shall not be steeper than 1:48 maximum in all directions.

406.3.1 **Landing.** A landing 48 inches (1220 mm) minimum by 48 inches (1220 mm) minimum shall be provided at the bottom of a curb ramp. The landing shall be permitted to overlap pedestrian routes and clear spaces other walking surfaces. Where the landing is constrained on two or more sides, the landing shall be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum. The 60-inch (1525 mm) dimension shall be provided in the direction of the pedestrian street crossing. The slope running and cross slopes of landings shall not be steeper than 1:48 maximum in all directions.

**SECTION 502**
**PARKING SPACES**

502.5 **Floor surfaces.** Parking spaces and access aisles shall comply with Section 302 and shall not have surface slopes not steeper than 1:48 measured along their length and width. Access aisles shall be at the same level as the parking spaces they serve.

**SECTION 503**
**PASSENGER LOADING ZONES**

503.4 **Floor surfaces.** Vehicle pull-up spaces and access aisles serving them shall comply with Section 302 and shall not have surface slopes not steeper than 1:48 measured along their length and width. Access aisles shall be at the same level as the vehicle pull-up space they serve.

**SECTION 802**
**ASSEMBLY AREAS**

802.2 **Floor surfaces.** The floor surface of wheelchair space locations shall not have a slope running and cross slopes not steeper than 1:48 and shall comply with Section 302.
805.5.1 Slope. Rail platforms shall not exceed a slope have running and cross slopes steeper than of 1:48 in all directions.

SECTION 1002
AMUSEMENT RIDES

1002.4.2 Slope. The floor surface of wheelchair spaces shall not have a slope running and cross slopes not steeper than 1:48 when in the load and unload position.

SECTION 1009
SWIMMING POOLS, WADING POOLS, HOT TUBS AND SPAS

1009.2.2 Seat location. In the raised position, the centerline of the seat shall be located over the deck and 16 inches (405 mm) minimum from the edge of the pool. The deck surface between the centerline of the seat and the pool edge shall not have a slope running and cross slopes not steeper than 1:48.

1009.2.3 Clear deck space.

1009.2.3.1 New buildings and facilities. In new buildings and facilities, on the side of the seat opposite the water, a clear deck space shall be provided parallel with the seat. The space shall be 36 inches (915 mm) minimum in width and shall extend forward 52 inches (1320 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck space shall not have a slope running and cross slopes not steeper than 1:48.

1009.2.3.2 Existing buildings and facilities. In existing buildings and facilities, on the side of the seat opposite the water, a clear deck space shall be provided parallel with the seat. The space shall be 36 inches (915 mm) minimum in width and shall extend forward 48 inches (1220 mm) minimum from a line located 12 inches (305 mm) behind the rear edge of the seat. The clear deck space shall not have a slope running and cross slopes not steeper than 1:48.

1009.4.1 Clear deck space. A clear deck space of 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum with a slope not steeper than 1:48 shall be provided at the base of the transfer wall. The clear deck space shall not have running and cross slopes steeper than 1:48. Where one grab bar is provided, the clear deck space shall be centered on the grab bar. Where two grab bars are provided, the clear deck space shall be centered on the clearance between the grab bars.

1009.5.2 Transfer space. A transfer space of 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum with a slope not steeper than 1:48 shall be provided at the base of the transfer platform surface. The transfer space shall not have running and cross slopes steeper than 1:48. The transfer space shall be centered along a 24-inch (610 mm) minimum side of the transfer platform. The side of the transfer platform serving the transfer space shall be unobstructed.
REASON: This proposal attempts to accomplish four things:
1. It establishes a new standard for measuring the slope in turning spaces. This requirement would apply wherever a turning space is required;
2. It clarifies how slopes are to be measured in sections that already limit the slope but, that are ambiguous as to where that slope is to be measured;
3. In Sections 406.2.1 and 406.3.1 we are proposing to revise the requirement that the slope measurement be taken “in all directions”. We are requesting this change this because a 2% slope in all directions results in a maximum slope closer to 3% (2 times the square root of 2) or 2.8 which is more than that allowed in any one direction.
4. For the sake of clarity, we propose to conform the format where the requirements limiting slope are written differently.

For the most part, we have elected to require that measurements be taken along the “running slope” and “cross slope” because these terms are defined in the Standard:
“running slope: The slope that is parallel to the direction of travel”
“cross slope: The slope that is perpendicular to the direction of travel”.
These terms work well when the direction of travel is readily identifiable. For a few spaces, such as parking spaces and their access aisles, the direction of travel is less observable. Consequently, for these few spaces, we would specify that the measurements be measured along the “length and width” of the spaces.

Committee Action: Disapproval 27-2-2
AS 8-22-2

REPORT OF HEARING:

Modification (if any):

Committee Reason: It was suggested in “two perpendicular directions” rather than “running and cross slope” would be easier to understand. “Running and cross slope” is confusing on surfaces where travel direction is in multiple directions. The description of the circular turning space, mathematically does not address this the way the proponent stated was the intent. The base of the T-turn is not addressed in the proposal. This should be addressed in the task group dealing with changes of elevation in a comprehensive manner.

03-04 – 2021 Ballot Comments

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<tr>
<td>Reason: The proposal is a step in the right direction and begins to achieve a more workable requirement for turning spaces on exterior surfaces with respect to the current obligation of assessing slopes in all directions. However, more refinement is needed for an effective requirement.</td>
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BALLOT COMMENT 2 - FIRST DRAFT:
Proponent: Marsha Mazz, USA
Desired Action: Negative with comment
Modification:
Reason: Approve as Submitted. This issue did not get a fair hearing because it was assigned to a task group on surfaces that never met and it was disapproved because time ran out.

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):
Committee Reason:

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Desired Action: Affirmative with comment
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Reason: The proposal is a step in the right direction and begins to achieve a more workable requirement for turning spaces on exterior surfaces with respect to the current obligation of assessing slopes in all directions. However, more refinement is needed for an effective requirement.

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Proponent: Marsha Mazz, USA
Desired Action: Negative with comment
Modification:
Reason: Approve as Submitted. This issue did not get a fair hearing because it was assigned to a task group on surfaces that never met and it was disapproved because time ran out.

Report of Hearing – First Draft:
Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:
Committee Reason:

FINAL ACTION:
Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:
Committee Reason:
03-05 – 2021 overview

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BC= Ballot Comment, PC= Public comment, Bold Comment number is proposed revision below

03-05 – 2021
304.3.1.1, 304.3.2.1.1

Proponent: Kimberly Paarlberg, represent International Code Council

Revise as follows:

SECTION 304
TURNING SPACE

304.3 Size. Turning spaces shall comply with Section 304.3.1 or 304.3.2.

304.3.1 Circular space.

304.3.1.1 New buildings and facilities. In new buildings and facilities, the turning space shall be a circular space with a 67-inch (1700 mm) minimum diameter.

304.3.1.1.1 Overlap. Turning spaces shall be permitted to include knee and toe clearance complying with Section 306. Where the turning space includes knee and toe clearances under an obstruction, the overlap shall comply with all of the following:
1. The depth of the overlap shall not be more than 40 22 inches (255 560 mm), and
2. The depth shall not exceed the depth of the knee and toe clearances provided, and
3. The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1.
304.3.1.2 Existing buildings and facilities. In existing buildings and facilities, the turning space shall be a circular space with a 60-inch (1525 mm) minimum diameter.

304.3.1.2.1 Overlap. Turning spaces shall be permitted to include knee and toe clearance complying with Section 306.

304.3.2 T-Shaped space.

304.3.2.1 New buildings and facilities. In new buildings and facilities, the turning space shall be a T-shaped space complying with one of the following:

1. A T-shaped space, clear of obstruction, that fits within an area 68 inches (1725 mm) wide and 60 inches (1525 mm) deep, with two arms and one base that are all 36 inches (915 mm) minimum in width. Each arm shall extend 16 inches (405 mm) minimum from each side of the base located opposite the other, and the base shall extend 24 inches (610 mm) minimum from the arms. At the intersection of each arm and the base, the interior corners shall be chamfered for 8 inches (205 mm) minimum along both the arm and along the base.

2. A T-shaped space, clear of obstruction, that fits within an area 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms 38 inches (965 mm) minimum
in width and a base 42 inches (1065 mm) minimum in width. Each arm shall extend 11 inches (280 mm) minimum from each side of the base, located opposite the other, and the base shall extend 22 inches (560 mm) minimum from each arm.

3. A T-shaped space, clear of obstruction, 64 inches (1625 mm) wide and 60 inches (1525 mm) deep, with two arms and one base 40 inches (1015 mm) minimum in width. Each arm shall extend 12 inches (305 mm) minimum from each side of the base and the base shall extend 20 inches (510 mm) minimum from each arm.

304.3.2.1.1 **Overlap.** Turning spaces shall be permitted to include knee and toe clearance complying with Section 306 of either the base or one arm. For Option 1, the base or arm is the portion beyond includes the chamfer.

304.3.2.2 **Existing buildings and facilities.** In existing buildings and facilities, the turning space shall be a T-shaped space within a 60-inch (1525 mm) minimum square, with arms and base 36 inches (915 mm) minimum in width. Each arm of the T shall be clear of obstructions 12 inches (305 mm) minimum in each direction, and the base shall be clear of obstructions 24 inches (610 mm) minimum.

304.3.2.2.1 **Overlap.** Turning spaces shall be permitted to include knee and toe clearance complying with Section 306 only at the end of either the base or one arm.
FIGURE 304.3.2.2.1
T-SHAPED TURNING SPACE – EXISTING BUILDINGS OVERLAP

**REASON:** The purpose of this proposal is to coordinate the overlap allowances for turning spaces. The A117.1 decided not to change the knee and toe clearances between the 2009 and 2017 edition. The turning spaces have increased in size and substantially limited the overlap at the same time. Since the circle and T-turn are to turn 180 degrees, they should be consistent – while now there are substantial differences in all 4 options. With the larger turning space, these proposals will still be a reduction on the total percentage of the turning space permitted under the sink, counter or drinking fountain. With the current text people just play games with the options to get the best for that design – thus making it much harder to verify compliance. Below are proportional comparisons of the existing and new construction requirements.

This is less than what is permitted for existing building, but would offer some level of consistency. The overlap would **not** increase for the Option 2 and 3 of the T-turns. The overlap for the T-turn with the chamfer would increase from 16” to 24”, but this should be balanced by the 16” of extra width required to accommodate the chamfers. The circle would increase to match Option 2 of the T-turns, which is the middle ground of the 3 T-turn options. With the increased size for the circle, the overlap would be 33% instead of what is the 25” or 42% that is permitted for existing buildings.
Proposed overlap allowance

Committee Action: Disapproved (Vote: 21-6-2)

REPORT OF HEARING:
Modification (if any):

Committee Reason: The proposed adjustment is in the wrong direction and should be made to decrease the overlap in the T-turn to match that required in the turning circle.

03-05 – 2021 Ballot Comments

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<td><strong>Reason:</strong> This should allow 17” to match minimum clearance allowed under dining and work surfaces and lavatories. The 10” dimension does not relate to any research or other section of the Standard.</td>
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| BALLOT COMMENT 2- FIRST DRAFT: |
**03-05 – 2021 Ballot Comment 2**

**304.3.1.1.1**

**Proponent:** Kimberly Paarlberg, ICC

Replace the proposal with the following:

**304.3.1.1.1 Overlap.** Turning spaces shall be permitted to include knee and toe clearance complying with Section 306. Where the turning space includes knee and toe clearances under an obstruction, the overlap shall comply with all of the following:

1. The depth of the overlap shall not be more than 10\(\frac{1}{16}\) inches (255.406 mm), and
2. The depth shall not exceed the depth of the knee and toe clearances provided, and
3. The overlap shall be permitted only within the turning circle area shown shaded in Figure 304.3.1.

*Revise figure to match overlap.*

**FIGURE 304.3.1.1**

**CIRCULAR TURNING SPACE – NEW BUILDINGS SIZE AND OVERLAP**

**REASON:** - The committee said that this proposal should take Dr. Steinfeld’s recommendations into consideration. That does not totally work because those recommendations were based on the knee and toe clearances being raised, which the committee chose not to accept. However, there is no technical justification for the overlap in the circle turn to be far more restrictive than any of the T-turns. So rather than asking for the largest of the overlaps, this is asking strictly for the circle turn to allow for the same overall as the smallest overlap allowed with the T-turns.

Committee Action for Ballot Comment 2:

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:**
Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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03-06 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

03-06 – 2021
305.5, 611.2, 804.5.3, 1104.11.3.1.1, 1104.12.2.1, 1104.12.2.3.3

Proponent: Edward Steinfeld, IDEA Center, University at Buffalo, representing RESNA

Revise as follows:

SECTION 305
CLEAR FLOOR SPACE

305.5 Position. Unless otherwise specified, clear floor spaces shall be provided as follows:
1. Positioned for either a forward or parallel approach to an element.
2. Centered on the appliance, equipment or fixture.
   Exception: An 8 inch (203 mm) maximum offset from the centerline is permitted for a parallel approach.

FIGURE 305.5(A)
611.2 Clear floor space. A clear floor space positioned for parallel approach shall be provided. For top loading machines, the clear floor space shall be centered on the appliance. For front loading machines, the centerline of the clear floor space shall be offset 24 inches (610 mm) maximum from the centerline of the door opening.
SECTION 804
KITCHENS

804.5.4.3 Parallel approach. Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on the appliance positioned in accordance with Section 305.5.

SECTION 1104
TYPE B UNITS

1104.11.3.1.1 Lavatory. A clear floor space positioned for a parallel approach shall be provided at a lavatory. The clear floor space shall be centered on the lavatory positioned in accordance with Section 305.5.
**FIGURE 1104.11.3.1.1**
LAVATORY IN TYPE B UNITS - OPTION A BATHROOMS

**1104.12.2.1 Sink.** A clear floor space, positioned for a parallel approach to the sink, shall be provided. The clear floor space shall be centered on the sink bowl, positioned in accordance with Section 305.5.

**1104.12.2.3.3 Parallel approach.** Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on the appliance, positioned in accordance with Section 305.5.

**REASON:** This section does not have the centering requirement found in section 11. Further, the wording elsewhere in the standard for parallel approaches is inconsistent regarding centering which is confusing and ambiguous. For example, Section 606.2, 704.2.1.1 and do not mention centering. It would be better to locate the centering requirement here as part of the building blocks and deleted elsewhere. Further, an exception is needed for the parallel approach to devices and equipment where centering is not the ideal solution. Research at the IDEA Center (and logic) demonstrates that centering clear floor area for a parallel approach actually reduces accessibility with a parallel approach because the shoulder of a wheeled mobility device user is not centered in the clear floor space. Further, appliances and fixtures do not always have their operable parts at the center of the device. Flexibility is needed to provide the best solution for each application. The attached summary of research findings provides support for the 8 in. offset. For the front approach, the difference in reachability between centering the clear floor area and offsetting it is so minimal that the offset exception is not needed.

---

**03-06 – 2021 Modification**

Proposed Modification

Proponent: Marsh Mazz, representing Accessibility Services, United Spinal Associates

**Replace** the proposal with the following:

SECTION 804
KITCHENS
804.5.4.3 **Parallel approach.** Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the appliance.

**SECTION 1103**  
**TYPE A UNITS**

1103.12.4 **Sink.** Sinks shall comply with Section 1103.12.4.  
1103.12.4.1 **Clear floor space.** A clear floor space, positioned for a forward approach to the sink, shall be provided. Knee and toe clearance complying with Section 306 shall be provided.  
**Exceptions:**  
1. The requirement for knee and toe clearance shall not apply to more than one bowl of a multi-bowl sink.  
2. Cabinetry shall be permitted to be added under the sink, provided the following criteria are met:  
   2.1 The cabinetry can be removed without removal or replacement of the sink,  
   2.2 The floor finish extends under the cabinetry, and  
   2.3 The walls behind and surrounding the cabinetry are finished.  
3. A clear floor space providing a parallel approach and centered on that is offset 8 inches (200 mm) maximum from the centerline of the sink shall be permitted at a kitchen sink in a space where a cook top or conventional range is not provided.  
4. A clear floor space providing a parallel approach and centered on that is offset 8 inches (200 mm) maximum from the centerline of the sink shall be permitted at wet bars.

1103.12.5.4 **Cooktop.** Cooktops shall comply with Section 1103.12.5.4.  
1103.12.5.4.1 **Approach.** A clear floor space, positioned for a parallel or forward approach to the cooktop, shall be provided.  
1103.12.5.4.3 **Parallel approach.** Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the appliance.

**SECTION 1104**  
**TYPE B UNITS**

1104.11.3.1.1 **Lavatory.** A clear floor space positioned for a parallel approach shall be provided at a lavatory. The clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the lavatory.  
**Exception:** A lavatory complying with Sections 606.3, 606.4 and 1104.1.1 shall be permitted. Cabinetry shall be permitted under the lavatory provided the following criteria are met:  
1. The cabinetry can be removed without removal or replacement of the lavatory, and  
2. The floor finish extends under the cabinetry, and
3. The walls behind and surrounding the cabinetry are finished.

**1104.12.2.1 Sink.** A clear floor space, positioned for a parallel approach to the sink, shall be provided. The clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the sink bowl.

**Exception:** A sink with a forward approach complying with Section 1103.12.4.1.

**1104.12.2.3 Cooktop.** Cooktops shall comply with Section 1104.12.2.3.

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

**1104.12.2.3.3 Parallel approach.** Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the appliance.

**Reason:** The modification drops the original proposal’s general requirement for centering clear floor spaces providing forward approaches. In addition, it limits application of the offset for clear floor spaces providing a parallel approach to those sections that currently contain a centering requirement for such clear floor spaces, rather than locating it in Chapter 3 Building Blocks where it would require centering with an offset for all clear floor spaces, no matter what types of elements they serve.

We do believe that the matter of locating clear floor spaces in relation to the elements and operable parts they serve deserves more study. However, we also believe that this proposal will provide needed flexibility for designers and builders without a negative impact on accessibility. Furthermore, the 8-inch offset is supported by Dr. Steinfeld’s research.

Note that we have not proposed a change to Section 611.2 which already allows clear floor space for a parallel approach to washing machines and clothes dryers to be offset.

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Committee Action: Approved as Modified (Vote:17-5-3)

**REPORT OF HEARING:**
**Modification (if any):** Refer to modification above. The modification is a total replacement.

**Committee Reason:** The modification spells out specific off-set allowances for sinks, cooktops and lavatories instead of where it would have applied to all operable parts. The modification limits the proposal to parallel approaches and not forward approaches. The modification eliminates absolute centering as required for those elements in the current standard. The modification is based on Mr. Steinfeld’s study showing an 8 inch off-set provides better accessibility to the appliance.
**03-06 – 2021 Ballot Comments**

**BALLOT COMMENT 1- FIRST DRAFT:**

*Proponent:* Rex Pace representing HUD  
* Desired Action:* Negative with Comment  
* Modification:*  

*Reason:* While there should be some flexibility for centering on appliances, the distance of 8” is too great, in particular for type B units. The direction of approach is a critical consideration for the 8” offset and depending on that condition will work. However, considering the direction of approach is not part of the requirement and could result in a position less usable than currently require and therefore is not an acceptable change.

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Committee Action for First Ballot:
REPORT OF HEARING:

Modification (if any):

Committee Reason:

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SECTION 804
KITCHENS

804.5.4.3 Parallel approach. Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the appliance.

SECTION 1103
TYPE A UNITS

1103.12.4 Sink. Sinks shall comply with Section 1103.12.4.

1103.12.4.1 Clear floor space. A clear floor space, positioned for a forward approach to the sink, shall be provided. Knee and toe clearance complying with Section 306 shall be provided.

Exceptions:
1. The requirement for knee and toe clearance shall not apply to more than one bowl of a multi-bowl sink.
2. Cabinetry shall be permitted to be added under the sink, provided the following criteria are met:
   2.1 The cabinetry can be removed without removal or replacement of the sink,
   2.2 The floor finish extends under the cabinetry, and
   2.3 The walls behind and surrounding the cabinetry are finished.
3. A clear floor space providing a parallel approach and centered on that is offset 8 inches (200 mm) maximum from the centerline of the sink shall be permitted at a kitchen sink in a space where a cook top or conventional range is not provided.
4. A clear floor space providing a parallel approach and centered on that is offset 8 inches (200 mm) maximum from the centerline of the sink shall be permitted at wet bars.

1103.12.5.4 Cooktop. Cooktops shall comply with Section 1103.12.5.4.

1103.12.5.4.1 Approach. A clear floor space, positioned for a parallel or forward approach to the cooktop, shall be provided.

1103.12.5.4.3 Parallel approach. Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the appliance.

SECTION 1104
TYPE B UNITS

1104.11.3.1.1 Lavatory. A clear floor space positioned for a parallel approach shall be provided at a lavatory. The clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the lavatory.

Exception: A lavatory complying with Sections 606.3, 606.4 and 1104.1.1 shall be permitted. Cabinetry shall be permitted under the lavatory provided the following criteria are met:
1. The cabinetry can be removed without removal or replacement of the lavatory, and
2. The floor finish extends under the cabinetry, and
3. The walls behind and surrounding the cabinetry are finished.

1104.12.2.1 Sink. A clear floor space, positioned for a parallel approach to the sink, shall be provided. The clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the sink bowl.

Exception: A sink with a forward approach complying with Section 1103.12.4.1.

1104.12.2.3 Cooktop. Cooktops shall comply with Section 1104.12.2.3.

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

1104.12.2.3.3 Parallel approach. Where the clear floor space is positioned for a parallel approach, the clear floor space shall be centered on offset 8 inches (200 mm) maximum from the centerline of the appliance.

Committee Reason: The modification spells out specific off-set allowances for sinks, cooktops and lavatories instead of where it would have applied to all operable parts. The modification limits the proposal to parallel approaches and not forward approaches. The modification eliminates absolute centering as required for those elements in the current standard. The modification is based on Mr. Steinfeld’s study showing an 8 inch off-set provides better accessibility to the appliance.

BALLOT COMMENT 1– FIRST DRAFT:
Proponent: Rex Pace representing HUD
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**03-07 – 2021 overview**

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

### 03-07 – 2021

#### 307.2

**Proponent:** Edward Steinfeld, IDEA Center, University at Buffalo, representing RESNA

Revise as follows:

**SECTION 307**

**PROTRUDING OBJECTS**

**307.2 Protrusion limits.** Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030mm) above the floor shall protrude 4 inches (100 mm) maximum horizontally into a circulation path.

**Exception:** Leading edges of overhanging fixtures, countertops and equipment configured for front approach are not consisted a protruding object.
**FIGURE 307.2
LIMITS OF PROTRUDING OBJECTS**

**REASON:** There is a conflict between this requirement and other requirements for knee clearances at lavatories, water fountains, baby changing tables, and other fixtures. These are not really protruding objects that can cause an accident.

Notes 4-7-2022: Tabled till 4/21/22 meeting. Moved off table on 4/21/22 to vote on.

Committee Action: 25-0-5 D

**REPORT OF HEARING:**
**Modification (if any):**

Committee Reason: Proponent agreed additional work is needed and will bring this back during the comment period.

---

**03-07 – 2021 Ballot Comments**

**BALLOT COMMENT 1- FIRST DRAFT:**

Proponent: *Doug Anderson, AHLA*

Desired Action: Negative with Comment

Modification:
Reason: There should be a deeper protrusion dimension for items that would be approached from the front due to the distance the cane extends out from the user.

**BALLOT COMMENT 2- FIRST DRAFT:**
- **Proponent:** Rex Pace, HUD
- **Desired Action:** Affirmative with comment
- **Modification:**
  - **Reason:** Ensure that commentary clarifies that knee spaces with leading edges can be higher than 27” (better for many people using wheelchairs) if there are side panels or similar to prevent hazards in the perpendicular direction.

---

**03-07 – 2021 Public Comment 1**

**307.2**

**Proponent:** Edward Steinfeld, IDEA Center, University at Buffalo, representing RESNA

Replace with the following:

**SECTION 307**

**PROTRUDING OBJECTS**

**307.2 Protrusion limits.** Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030mm) above the floor shall protrude 4 inches (100 mm) maximum horizontally into a circulation path.

  **Exception:** Overhanging fixtures, countertops and equipment shall not be considered protruding objects where a leading edge does not protrude more than four inches horizontally into a circulation path perpendicular to the direction of the front approach.
FIGURE 307.2
LIMITS OF PROTRUDING OBJECTS

**REASON:** A typo and grammatical error in the original proposal were corrected and language added to clarify that this exception does not allow fixtures, countertops and equipment to be hazardous to someone walking in parallel direction. The last sentence clarifies where the leading edge should be measured.
Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Steinfeld.doc

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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### Report for 03-07–2021

| BALLOT COMMENT 1 - FIRST DRAFT: |  |
|-------------------------------|  |
| **Proponent:** Doug Anderson, AHLA |  |
| **Desired Action:** Negative with Comment |  |
| **Modification:** |  |
| **Reason:** There should be a deeper protrusion dimension for items that would be approached from the front due to the distance the cane extends out from the user. |  |

| BALLOT COMMENT 2 - FIRST DRAFT: |  |
|-------------------------------|  |
| **Proponent:** Rex Pace, HUD |  |
| **Desired Action:** Affirmative with comment |  |
| **Modification:** |  |
| **Reason:** Ensure that commentary clarifies that knee spaces with leading edges can be higher than 27” (better for many people using wheelchairs) if there are side panels or similar to prevent hazards in the perpendicular direction. |  |

Committee decision: AS/AM/D  
Committee Vote at Meeting:  
Committee Vote on Ballot:

### REPORT OF HEARING – FIRST DRAFT

### BALLOT COMMENT- SECOND DRAFT:

| **Proponent:** |  |
| **Desired Action:** |  |
| **Modification:** |  |
| **Reason:** |  |

Committee decision: AS/AM/D  
Committee Vote at Meeting:  
Committee Vote on Ballot:

### FINAL ACTION:

| **Modification (if any):** |  |
| **Committee Reason:** |  |
03-08 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed

revision below

03-08 – 2021

307.3

Proponent: Peter A. Stratton, Steven Winter Associates, Inc.

Revise as follows:

SECTION 307

PROTRUDING OBJECTS

307.3 Post-mounted objects. Objects on posts or pylons shall be permitted to overhang 4 inches (100 mm) maximum where more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the floor. Objects on multiple posts or pylons where the clear distance between posts or pylons is greater than 12 inches (305 mm) shall have the lowest edge of such object either 27 inches (685 mm) maximum or 80 inches (2030 mm) minimum above the floor.

Exception Exceptions:
1. Sloping portions of handrails between the top and bottom riser of stairs and above the ramp run shall not be required to comply with this section.
2. Objects on standpipes within exit stairway enclosures shall not be required to comply with this section.

REASON: Standpipe systems in enclosed fire stairs are required to be installed in buildings to allow the fire department to connect fire hoses in the event of a fire. In 100% of all cases, horizontal valves to which a fire hose is connected protrude more than 4 inches from the vertical standpipe at up to 16 inches. In other words, horizontal valves that are a part of the standpipe system can never comply with the 4-inch protrusion limit imposed by Section 307.3. For this reason, horizontal valves protruding from vertical standpipes are important for fire safety and should remain as installed and be exempt from the 4 inch protrusion limit imposed by 307.3.

Committee Action: Disapproved (Vote: 21-4-2)
REPORT OF HEARING:
Modification (if any):

Committee Reason: It is important to avoid protruding objects in egress pathways for occupants evacuating. The proposed exception is not appropriate for blind occupants that shore along the wall will evacuating in the stairwell.

03-08 – 2021 Ballot Comments

**BALLOT COMMENT 1- FIRST DRAFT:**
Proponent: Doug Anderson, AHLA
Desired Action: Negative with Comment
Modification:
Reason: Caning technic would make it virtually impossible to run into these elements within the space of a stair landing. Also, visually impaired users typically use the inside stair handrail to guide them down stairways.

**BALLOT COMMENT 2- FIRST DRAFT:**
Proponent: Kim Paarlberg representing ICC
Desired Action: Negative with comment
Modification: See Ballot Comment 2

03-08 – 2021 Ballot Comment 2
307.3

Proponent: Kimberly Paarlberg, ICC

Replace proposal with the following:

**307.3 Post-mounted objects.** Objects on posts or pylons shall be permitted to overhang 4 inches (100 mm) maximum where more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the floor. Objects on multiple posts or pylons where the clear distance between posts or pylons is greater than 12 inches (305 mm) shall have the lowest edge of such object either 27 inches (685 mm) maximum or 80 inches (2030 mm) minimum above the floor.

**Exception Exceptions:**
1. Sloping portions of handrails between the top and bottom riser of stairs and above the ramp run shall not be required to comply with this section.
2. Hose connections and fitting on standpipes shall not be required to comply with this section.

-or-

2. Hose connections and fitting on standpipes shall be permitted to overhang 12 inches maximum where more than 27 inches and not more then 80 inches above the floor.

Figure 307.3 (A)
POST-MOUNTED PROTRUDING OBJECTS

Figure 307.3 (B)
POST-MOUNTED PROTRUDING OBJECTS

REASON:
There is a current issue with standpipes where required in exit stairways. Fire department have to have access to connections, including substantial room for leverage to operate valves. Where designers have chosen cowl detection, access is limited. Where designers have chosen low bars for detection, some code officials have cited them for reducing the landing to below the required depth. **ADA allows for objects on posts to stick out 12” maximum.**
Standpipes must be located outside of the circulation path for means of egress.

Example of a cowl. Concern with access for fire department and operation.
Example of a low bar. Detectable, but possibly an obstruction for general egress on the landing or could tangle with the hose.
People with long canes are not typically using them in a stairway situation, so how much is this actually helping?

Committee Action for Ballot Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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<td>Committee Reason: It is important to avoid protruding objects in egress pathways for occupants evacuating. The proposed exception is not appropriate for blind occupants that shore along the wall will evacuating in the stairwell.</td>
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| BALLOT COMMENT 1- FIRST DRAFT: |
**Proponent:** Doug Anderson, AHLA  
**Desired Action:** Negative with Comment  
**Modification:**

Reason: Caning technic would make it virtually impossible to run into these elements within the space of a stair landing. Also, visually impaired users typically use the inside stair handrail to guide them down stairways.

---

**BALLOT COMMENT 2: FIRST DRAFT:**  
**Proponent:** Kim Paarlberg representing ICC  
**Desired Action:** Negative with comment  
**Modification:**

Replace proposal with the following:

307.3 *Post-mounted objects.* Objects on posts or pylons shall be permitted to overhang 4 inches (100 mm) maximum where more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the floor. Objects on multiple posts or pylons where the clear distance between posts or pylons is greater than 12 inches (305 mm) shall have the lowest edge of such object either 27 inches (685 mm) maximum or 80 inches (2030 mm) minimum above the floor.

*Exception Exceptions:*

1. Sloping portions of handrails between the top and bottom riser of stairs and above the ramp run shall not be required to comply with this section.

2. Hose connections and fitting on standpipes shall not be required to comply with this section.

- or -

2. Hose connections and fitting on standpipes shall be permitted to overhang 12 inches maximum where more than 27 inches and not more than 80 inches above the floor.

Figure 307.3 (A)  
POST-MOUNTED PROTRUDING OBJECTS  
Figure 307.3 (B)  
POST-MOUNTED PROTRUDING OBJECTS

Reason: There is a current issue with standpipes where required in exit stairways. Fire department have to have access to connections, including substantial room for leverage to operate valves. Where designers have chosen cowl detection, access is limited. Where designers have chosen low bars for detection, some code officials have cited them for reducing the landing to below the required depth. **ADA allows for objects on posts to stick out 12” maximum.**
Standpipes must be located outside of the circulation path for means of egress.

Example of a cowl. Concern with access for fire department and operation.
Example of a low bar. Detectable, but possibly an obstruction for general egress on the landing or could tangle with the hose. People with long canes are not typically using them in a stairway situation, so how much is this actually helping?

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03-09 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

03-09 – 2021
307.4

Proponent: Gene Boecker, Code Consultants, Inc.

Revise as follows:

SECTION 307
PROTRUDING OBJECTS

307.4 Vertical clearance. Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or barrier shall be located between 10 inches (255 mm) and 27 inches (685 mm) maximum above the floor. Where the clear distance between vertical supports for a horizontal element is greater than 12 inches (305 mm), an intermediate horizontal element shall be provided at a height between 10 inches (255 mm) and 18 inches (455 mm) above the floor.

Exception: Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.
FIGURE 307.4
REDUCED VERTICAL CLEARANCE

REASON: This includes two changes. The first is a minimum height for a horizontal element. A height of 10 inches was proposed based on several factors. It should be high enough that it cannot be mistaken for a step on a stair. It should be high enough that it can be relatively seen by seeing people and not confused with the floor surface. And, it should be of a height that acts as a barrier to dogs. Which is also the reason for the second proposal.

The second part of this is a recommendation for an intermediate horizontal rail when a higher rail is used. As currently written, a single horizontal rail at 27 inches would be acceptable. However, service dogs can step over low elements or walk under a single rail at 27 inches in height. A dimension of 18 inches is proposed as the maximum separation between horizontal elements. That way, if a cane detectable horizontal flat bar is placed at 20 inches in height, an intermediate would be required. Any height between the two would be acceptable. If the top element is at a handrail height of 36 inches only a single intermediate handrail would be required. This is similar to the guard requirements in the building code for areas that are not open to the public (e.g., loading docks, industrial/utility areas) so the design concept would not be new (IBC 1015.4, exception 4 – which uses a 21-inch sphere limitation).

Committee Action: Approved as Modified (Vote: 20-2-4)

REPORT OF HEARING:
Modification (if any):

Further modify as follows:

307.4 Vertical clearance. Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or barrier shall be located between 10 inches (255 mm) and 27 inches (685 mm) above the floor. Where the clear distance between vertical supports for a horizontal element is greater than 12 inches (305 mm), an intermediate horizontal element shall be provided at a height between 10 inches (255 mm) and 18 inches (455 mm) above the floor.

Exception: Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.
**Committee Reason:**
The modification to delete the last sentence of Section 307.4 is because there are many good options to make a barrier detectable at lower levels (e.g., 2nd bar are curb height, permanent seating) that would not comply with the proposed language. The proposal to add a lower end for the barriers would stop the allowances for barriers such as platforms that are step height or curbs on the floor that are tripping hazard or could be misinterpreted by person with visual impairments looking for the stairway. It was suggested that a possible modification would be “between 10 inches minimum and 27 inches maximum” to pick up both ends of the range.

**03-09 – 2021 Ballot Comments**

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<td><strong>Reason:</strong></td>
<td>Not sure where the 10” came from. Using 4” from the 4” max sphere rule would be tied to a relevant requirement.</td>
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<td>10” Rail is a tripping hazard and needs visual contrast with walking surface</td>
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<td><strong>Reason:</strong></td>
<td>No justification for the 10” dimension. While I understand the idea it creates many situation where a protruding object is now created where one did not exist before. Example. Retail shelves where the lowest shelf protrudes further than the upper shelves by 1” This is below the minimum 10”. Objects that protrude 3 1/2” from the lower shelf is now a protruding object at 4 1/2” from the first shelf above 10”. This situation as exists would never be confused for a step which is the purpose of the proposal.</td>
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03-09– 2021 Ballot Comment 3

307.4

Proponent: Kimberly Paarlberg, ICC

Further modify as follows:

**307.4 Vertical clearance.** Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or other barriers shall be detectable located between 10 inches (255 mm) and 27 inches (685 mm) maximum above the floor. Low rails, curbs or platforms utilized as barriers that are located where they can be tripping hazard shall not be less than 10 inches (255 mm) minimum measured vertically above the floor surface.

**Exception:** Door closers and doorstops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

**REASON:** While I understand the intent low curbs or rails that are tripping hazards, I believe that this could be read to prohibit a wall because it goes below 10”. ‘Between’ prohibits items at 10” and 27”. I have also see low curbs be used parallel to a walking surface to keep people from stepping under cross beams on a walkway that work very well, and this would be prohibited by the approved revised text. I would suggest a compromise that I feel meets the intent of the original proposal.
Committee Action for Ballot Comment 3:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

03-09 – 2021 Ballot Comment 5
307.4
Proponent: Ken Schoonover, self

Further revise as follows:

307.4 Vertical clearance. Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or barrier shall be located between 10 inches (255 mm) minimum and 27 inches (685 mm) maximum above the floor.

Exception: Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

REASON: Further modify the proposal for consistency with how a range of dimensions are specified, as follows:
“The leading edge of such rails or barrier shall be located between 10 inches (255 mm) minimum and 27 inches (685 mm) maximum above the floor.”

Committee Action for Ballot Comment 5:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

03-09 Schoonover.doc

03-09 – 2021 Public Comment 1

307.4

Proponent: Edward Steinfeld, IDEA Center, University at Buffalo, representing RESNA

Replace with the following:

SECTION 307
PROTRUDING OBJECTS

307.4 Vertical clearance. Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or barrier shall be located 27 inches (685 mm) maximum above the floor. If the leading edge of such rails or barriers is less than 24 inches (610 mm) high such rail or barrier shall have a visual contrast of dark-on-light or light-on-dark from the adjacent surfaces.
**Exception:** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

---

**REASON:** All pedestrians are at risk in these conditions. The intent of the proposal is well meaning but overly complex, overly restrictive, and likely to be ineffective. As written, it can be interpreted to allow a barrier of 10 in. which can easily be missed, especially if it is a color that blends into the surroundings in a dimly lit area. It also can be interpreted to mean that there has to be a balustrade or grill of some sorts between 10 in. and 27 in. which is more protection than actually needed where there is no drop off. There is no need for an intermediate railing if the high railing is visible. The proposed modification simplifies the requirement, provides more flexibility in design, and adds the requirement for visibility, which is crucial for safety. The proposed text is similar to the stair visual contrast in Section 504.6.

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**Committee Action for Public Comment 1:**

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:**

03-09 Steinfeld.doc

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**03-09 – 2021 Public Comment 2**

**307.4**

**Proponent:** Chris Schexnayder

**Further revise as follows:**

**SECTION 307**

**PROTRUDING OBJECTS**

**307.4 Vertical clearance.** Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or barrier shall be located between 49 4 inches (255 mm) and 27 inches (685 mm) maximum above the floor.

**Exception:** Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.
REASON: There has never been any guidance in the standards as to what is the minimum height of a cane detection barrier. If it changes to 10”; there will be tons of non-compliant conditions all over the country. Recommend 4” as one method is to bolt a 4” angle iron to the floor.

Committee Action for Public Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

03-09 Schexnayder.doc

03-09 – 2021 Public Comment 3
307.4

Proponent: Marsha Mazz, representing Terminology Work Group

Further revise as follows:

SECTION 307
PROTRUDING OBJECTS

307.4 Vertical clearance. Vertical clearance shall be 80 inches (2030 mm) high minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm) high. The leading edge of such rails or barrier shall be located between 10 inches (255 mm) minimum and 27 inches (685 mm) maximum above the floor.

Exception: Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

REASON: This is part of a proposal from the Terminology task group to replace ‘between’ in the standard. Between is not clear as to if the end points are included or not.

This same issue includes Sections 307.4, 404.2.2, 602.2.5, 602.3.4, and new 608.2.2.3.

Committee Action for Public Comment 3:

REPORT OF HEARING:

Modification (if any):
Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Report for 03-09-2021

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REPORT OF HEARING:

Modification (if any):

Further modify as follows:

**307.4 Vertical clearance.** Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or barrier shall be located between 10 inches (255 mm) and 27 inches (685 mm) maximum above the floor. Where the clear distance between vertical supports for a horizontal element is greater than 12 inches (305 mm), an intermediate horizontal element shall be provided at a height between 10 inches (255 mm) and 18 inches (455 mm) above the floor.

*Exception:* Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

Committee Reason: The modification to delete the last sentence of Section 307.4 is because there are many good options to make a barrier detectable at lower levels (e.g., 2nd bar are curb height, permanent seating) that would not comply with the proposed language. The proposal to add a lower end for the barriers would stop the allowances for barriers such as platforms that are step height or curbs on the floor that are tripping hazard or could be misinterpreted by person with visual impairments looking for the stairway. It was suggested that a possible modification would be "between 10 inches minimum and 27 inches maximum" to pick up both ends of the range.

**BALLOT COMMENT 1 - FIRST DRAFT:**

Proponent: Doug Anderson, AHLA
Desired Action: Negative with Comment
Modification:
Reason: Not sure where the 10" came from. Using 4" from the 4" max sphere rule would be tied to a relevant requirement.

**BALLOT COMMENT 2 - FIRST DRAFT:**

Proponent: Dennis Hall representing CSA
Desired Action: Negative with Comment
Modification:
Reason: 10" Rail is a tripping hazard and needs visual contrast with walking surface

**BALLOT COMMENT 3 - FIRST DRAFT:**

Proponent: Kim Paarlberg representing ICC
Desired Action: Negative with comment
Modification:
Further modify as follows:

**307.4 Vertical clearance.** Vertical clearance shall be 80 inches (2030 mm) minimum. Rails or other barriers shall be provided where the vertical clearance is less than 80 inches (2030 mm). The leading edge of such rails or other barriers shall be detectable located between 10 inches (255 mm) and 27 inches (685 mm) maximum above the floor. Low rails, curbs or platforms utilized as barriers that are located where they can be tripping hazard shall not be less than 10 inches (255 mm) minimum measured vertically above the floor surface.

*Exception:* Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the floor.

Reason: While I understand the intent low curbs or rails that are tripping hazards, I believe that this could be read to prohibit a wall because it goes below 10’. ‘Between’ prohibits items at 10’ and 27’. I have also see low curbs be used parallel to a walking surface to keep people from stepping under cross beams on a walkway that work very well, and this would be prohibited by the approved revised text. I would suggest a compromise that I feel meets the intent of the original proposal.
**BALLOT COMMENT 4 - FIRST DRAFT:**
*Proponent: M. Bradley Gaskins representing NACS*
*Desired Action: Negative with Comment*
*Modification:*
*Reason:* No justification for the 10” dimension. While I understand the idea it creates many situations where a protruding object is now created where one did not exist before. Example. Retail shelves where the lowest shelf protrudes farther than the upper shelves by 1”. This is below the minimum 10” Objects that protrude 3 1/2” from the lower shelf is now a protruding object at 4 1/2” from the first shelf above 10”. This situation as exists would never be confused for a step which is the purpose of the proposal.

**BALLOT COMMENT 5 - FIRST DRAFT:**
*Proponent: Ken Schoonover, Individual Member*
*Desired Action: Affirmative with comment*
*Modification:*
*Reason:* Further modify the proposal for consistency with how a range of dimensions are specified, as follows:

“The leading edge of such rails or barrier shall be located between 10 inches (255 mm) minimum and 27 inches (685 mm) maximum above the floor.”

**REPORT OF HEARING – FIRST DRAFT**

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**Committee Reason:**

**BALLOT COMMENT - SECOND DRAFT:**
*Proponent:*
*Desired Action:*
*Modification:*
*Reason:*

**FINAL ACTION:**

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**Committee Reason:**
03-10 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

03-10 – 2021
309.1

Proponent: Ashley Pitts, Jensen Hughes, Inc.

Revise as follows:

**SECTION 309**
**OPERABLE PARTS**

309.1 General. Operable parts shall comply with Section 309.

Exceptions:

1. Receptacle outlets serving a dedicated use.
2. Where two or more receptacle outlets are provided in a kitchen above a length of countertop that is uninterrupted by a sink or appliance, one receptacle outlet shall not be required to comply with this section.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a countertop in a corner between appliances, receptacle outlets over the counter-top shall not be required to comply with this section provided that the countertop area does not exceed 9 square feet (0.835 m2) maximum.
4. In a kitchen in an Accessible or Type A dwelling unit or sleeping unit, freestanding or slide-in appliances are not considered to impact the reach depth to receptacle outlets, switches or controls over the countertop.
45. Floor receptacle outlets.
56. HVAC diffusers.
67. Controls mounted on ceiling fans.
78. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to comply with this section.
89. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
910. Electrical panelboards shall not be required to comply with Section 309.4.
1011. Emergency aid devices, such as fire department hose connections, valve controls, gauges, police call boxes and annunciator panels shall not be required to comply with this section provided that they are used only for emergencies by emergency personnel acting in their official capacity.

**REASON:** The proposed change affects kitchens in Accessible and Type A dwelling units or sleeping units. The standard should clarify whether appliance protrusions, such as range and refrigerator protrusions, can be ignored for purposes of complying with the limitations for side reach over kitchen counters. Standard appliances such as ranges and refrigerators protrude beyond the face of the countertop several inches. In typical kitchen arrangements, there are commonly sections of countertop between these appliances, or between these appliances and other elements, where a parallel clear floor space cannot be positioned directly adjacent to the countertop due to an appliance protrusion. This issue does not only occur at “inside corners,” but also commonly occurs at linear kitchens with less than 48” between appliance protrusions.
03-10 – 2021 Replacement 1
309.1

Proponent: Reach work group

Replace and revise as follows:

309.1 General. Operable parts shall comply with Section 309.
Exceptions:
   1. Receptacle outlets serving a dedicated use.
2. Where two or more receptacle outlets are provided in a kitchen above a length of
countertop that is uninterrupted by a sink or appliance, one receptacle outlet shall not be
required to comply with this section.

3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a
countertop in a corner between appliances, receptacle outlets over the countertop shall
not be required to comply with this section provided that the countertop area does not
exceed 9 square feet (0.835 m²) maximum.

4. Floor receptacle outlets.

5. HVAC diffusers.

6. Controls mounted on ceiling fans.

7. Where redundant controls other than light switches are provided for a single element, one
control in each space shall not be required to comply with this section.

8. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.

9. Electrical panelboards shall not be required to comply with Section 309.4.

10. Emergency aid devices, such as fire department hose connections, valve controls, gauges,
police call boxes and annunciator panels shall not be required to comply with this section
provided that they are used only for emergencies by emergency personnel acting in their
official capacity.

11. Other than within or serving dwelling or sleeping units, receptacle outlets serving
counters in kitchens shall not be required to comply with Section 309 where they comply
with Section 804.6.

**804.6 Receptacle Outlets Serving Counters in Kitchens.** In kitchens, at least one receptacle
outlet serving counters shall comply with Section 309. Where two or more receptacle outlets
serving counters are provided, at least two shall comply with Section 309. Where a work surface
is required by Section 804.3, at least one such receptacle outlet shall be located at the work
surface. All other receptacle outlets serving the counters shall not be required to comply with
Sections 309.2 and 309.3 where complying with at least one of the following:

1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.

2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48
inches maximum above the floor and 15 inches maximum from front edge of the counter.

3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54
inches maximum from the floor and 15 inches maximum from the front edge of the
counter and with a forward plug insertion.

**Reason:**
Replace 03-10–2021, 03-11–2021, 03-12–2021, 03-15–2021, 03-16–2021

This proposed change clarifies and streamlines the criteria for locating accessible receptacle
outlets in public use and common use kitchens.

To a great extent, this proposal mirrors the Receptacles Task Group replacement proposal for
Type A dwelling units, which was approved unanimously by the A117.1 Committee in the
March 16, 2023, meeting. A full explanation of the changes can be found there. The additional
changes and considerations which differ from that proposal are described here.
Coordination with Kitchens in Accessible Dwelling and Sleeping Units
The Receptacles Task Group differentiated between kitchens inside and outside of dwelling and sleeping units. It may end up being an editorial issue, but it is helpful for the discussion of the different locations of kitchens and will facilitate BALLOT COMMENT. The requirement for public use and common use kitchens was located in new Section 804.6, and new language for kitchens inside dwelling and sleeping units was added in Section 1102.9.

Kitchens and Kitchenettes, Kitchens Outside of Dwelling and Sleeping Units
The new language from this proposal, shown underlined here, is a response to the following points.

In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309.

- The National Electrical Code does not provide minimum requirements for small appliance or convenience receptacles in kitchens outside of dwelling and sleeping units as it does for those inside dwelling and sleeping units.

- There is no definition for kitchen in A117.1, and the term “kitchenette” was almost completely removed from the standard during the last cycle. The Task Group avoided introducing any new definitions.

- The Task Group continues to operate with the intent that receptacle placement should not dictate kitchen design. Therefore, the Task Group wants to avoid requiring two accessible receptacle outlets where only one receptacle outlet would be required. These areas might include wet bars, coffee preparation areas and other small food and beverage preparation areas.

03-10 – 2021 Replacement 2

Proponent: Reach work group

Replace and revise as follows:

1102.9 Operable parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls and user controls for security or intercom systems shall comply with Section 309.

Exception: Receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1102.9.1.

1102.9.1 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work
surface. All other receptacle outlets serving the counters shall comply with at least one of the following:

1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

Reason:
Replace 03-10–2021, 03-11–2021, 03-12–2021, 03-15–2021, 03-16–2021

This proposed change simplifies and streamlines the criteria for locating receptacle outlets in kitchens of Accessible dwelling and sleeping units.

To a great extent, this proposal mirrors the Receptacles Task Group replacement proposal for Type A dwelling units, which was approved unanimously by the A117.1 Committee in the March 16, 2023, meeting. A full explanation of the changes can be found there. The additional changes and considerations which differ from that proposal are described here.

Coordination with Public Use and Common Use Kitchens

The Receptacles Task Group differentiated between kitchens inside and outside of dwelling and sleeping units. It may end up being an editorial issue, but it is helpful for the discussion of the different locations of kitchens and will facilitate BALLOT COMMENT. The requirement for public use and common use kitchens was located in new Section 804.6, and new language for kitchens inside dwelling and sleeping units was added in Section 1102.9.

Kitchens and Kitchenettes, Kitchens Outside of Dwelling and Sleeping Units

The new language from this proposal, shown underlined here, is a response to the following points.

- In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309.
- The National Electrical Code does not provide minimum requirements for small appliance or convenience receptacles in kitchens outside of dwelling and sleeping units as it does for those inside dwelling and sleeping units.
- There is no definition for kitchen in A117.1, and the term “kitchenette” was almost completely removed from the standard during the last cycle. The Task Group avoided introducing any new definitions.
- The Task Group continues to operate with the intent that receptacle placement should not dictate kitchen design. Therefore, the Task Group wants to avoid requiring two accessible receptacle outlets where only one receptacle outlet would be required. These areas might include wet bars, coffee preparation areas and other small food and beverage preparation areas.
Committee Action: Approval as Modified
   Replacement 1 29-0-2
   Replacement 2 30-0-0

REPORT OF HEARING:

Modification (if any):
Replace and revise as follows:

309.1 General. Operable parts shall comply with Section 309.
Exceptions:
   1. Receptacle outlets serving a dedicated use.
   2. Where two or more receptacle outlets are provided in a kitchen above a length of
countertop that is uninterrupted by a sink or appliance, one receptacle outlet shall not be
required to comply with this section.
   3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a
countertop in a corner between appliances, receptacle outlets over the countertop shall
not be required to comply with this section provided that the countertop area does not
exceed 9 square feet (0.835 m2) maximum.
   4. Floor receptacle outlets.
   5. HVAC diffusers.
   6. Controls mounted on ceiling fans.
   7. Where redundant controls other than light switches are provided for a single element, one
control in each space shall not be required to comply with this section.
   8. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
   9. Electrical panelboards shall not be required to comply with Section 309.4.
10. Emergency aid devices, such as fire department hose connections, valve controls, gauges,
police call boxes and annunciator panels shall not be required to comply with this section
provided that they are used only for emergencies by emergency personnel acting in their
official capacity.
11. Other than within or serving dwelling or sleeping units, receptacle outlets serving
counters in kitchens shall not be required to comply with Section 309 where they comply
with Section 804.6.

804.6 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle
outlet serving counters shall comply with Section 309. Where two or more receptacle outlets
serving counters are provided, at least two shall comply with Section 309. Where a work surface
is required by Section 804.3, at least one such receptacle outlet shall be located at the work
surface. All other receptacle outlets serving the counters shall not be required to comply with
Sections 309.2 and 309.3 where complying with at least one of the following:
   4. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
   5. Operable parts of receptacle outlets located on the side wall over the counter shall be 48
inches maximum above the floor and 15 inches maximum from front edge of the counter.
6. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

1102.9 Operable parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls and user controls for security or intercom systems shall comply with Section 309.

Exception: Receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1102.9.1.

1102.9.1 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall comply with at least one of the following:

4. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
5. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
6. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

Staff Note: Approval of this proposal will also delete Figure 309.1 OPERABLE PARTS – EXCEPTION 3

Committee Reason: The requirements for shared kitchens and Accessible units are consistent with what the committee approved for Type A and Type B units. This addressed the concerns for access to electrical outlets for persons using the kitchen. There were several proposals that tried to address questions about appliances sticking out past the cabinet depth, counter top drip edge what are appropriate allowances. This will allow good kitchen design for all elements in the space and will provide good accessibility.

03-10 – 2021 Ballot Comments

| BALLOT COMMENT 1- FIRST DRAFT: |
| Proponent: Kimberly Paarlberg |
| Desired Action: Affirmative with comment |
| Modification: See Ballot Comment 1 |

| BALLOT COMMENT 2- FIRST DRAFT: |
| Proponent: Kimberly Paarlberg |
| Desired Action: Affirmative with comment |
| Modification: See Ballot Comment 2 |
Further revise as follows:

309.1 General. Operable parts shall comply with Section 309.

Exceptions:
1. Receptacle outlets serving a dedicated use.
2. Floor receptacle outlets.
3. HVAC diffusers.
4. Controls mounted on ceiling fans.
5. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to comply with this section.
6. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
7. Electrical panelboards shall not be required to comply with Section 309.4.
8. Emergency aid devices, such as fire department hose connections, valve controls, gauges, police call boxes and annunciator panels shall not be required to comply with this section provided that they are used only for emergencies by emergency personnel acting in their official capacity.
9. Other than within or serving dwelling or sleeping units, receptacle outlets serving counters in kitchens shall not be required to comply with Section 309 where they comply with Section 804.6.

804.6 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying with at least one of the following:
1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

1102.9 Operable parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls and user controls for security or intercom systems shall comply with Section 309.
Exception: Receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1102.9.1.

1102.9.1 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall comply with at least one of the following:

1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

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REASON: I strongly support the work done by the Reach Over Counter Task Group. I have a suggestion that I believe is editorial to remove redundant language. Since the committee voted to approve the requirements for 309.1 and 1102.9.1 to be the same, there is no need to repeat the information.

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Committee Action for Ballot Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

03-10 – 2021 Ballot Comment 2

309.1, 1102.9

Proponent: Kimberly Paarlberg, ICC

Further revise as follows:

309.1 General. Operable parts shall comply with Section 309.

Exceptions: The operable parts of the following are not required to comply with Section 309:

1. Receptacle outlets serving a dedicated use.
2. Floor receptacle outlets.
3. HVAC diffusers.
4. Controls mounted on ceiling fans.
5. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to comply with this section.
6. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
7. Electrical panelboards shall not be required to comply with Section 309.4.
8. Emergency aid devices, such as fire department hose connections, valve controls, gauges, police call boxes and annunciator panels shall not be required to comply with this section provided that they are used only for emergencies by emergency personnel acting in their official capacity.
9. Other than within or serving dwelling or sleeping units, receptacle outlets serving counters in kitchens shall not be required to comply with Section 309 where they comply with Section 804.6.

804.6 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying with at least one of the following:
   1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
   2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
   3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

1102.9 Operable parts. Operable part of Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls and user controls for security or intercom systems shall comply with Section 309. 
   **Exception:** Receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1102.9.1.

1102.9.1 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall comply with at least one of the following:
   1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
   2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
   3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.
**REASON:** 309.1 and 1102.9 – adding ‘the operable parts’ at the beginning of the exception in the exceptions to 309.1 and the first sentence to Section 1102.9 just makes the requirements more precise and consistent with the reference to Section 309. This would be consistent with the committee action on 03-16-2021. There will be a similar proposal for 1103.9 (10-03) and 1104.9.

Committee Action Ballot Comment 2:

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:**

03-10 Paarlberg 2.doc

03-10 – 2021 Public Comment 1

804.6

**Proponent:** Dan Buuck, National Association of Home Builders (NAHB), representing Receptacle Task Group

Further revise as follows:

**SECTION 804**

**KITCHENS**

804.6 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall serve be located at the work surface. The operable parts of each additional All other receptacle outlet outlets serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying with at least one of the following:

1. Operable parts of receptacle outlets They shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets Where located on the side wall over the counter, they shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets Where located at the face of the upper cabinets, they shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.
REASON: During committee discussion, it was suggested that the sections on receptacles be reorganized to reduce repetition. To do this, the language on “operable parts” was added to the main paragraph and removed from the list of items.

Another suggestion was to align the language by changing the phrase from “located at the work surface” to “serve the work surface” similar to what is used for counters. This term aligns with the National Electrical Code which will lead to more uniform enforcement.

Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

03-10 – 2021 Public Comment 2
1102.9, 1102.9.1

Proponent: Dan Buuck, National Association of Home Builders (NAHB), representing Receptacle Task Group

Further revise as follows:

SECTION 1102
ACCESSIBLE UNITS

1102.9 Operable Parts. Operable parts of lighting controls, electrical panelboards, electrical switches, and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls, and user controls for security intercom systems shall comply with Section 309.

Exception: Operable parts of receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1102.9.1.

1102.9.1 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall serve the work surface. The operable parts of each additional All other receptacle outlet serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying comply with at least one of the following:

1. Operable parts of receptacle outlets They shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets Where located on the side wall over the counter, they shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.

3. Operable parts of receptacle outlets Where located at the face of the upper cabinets, they shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

**REASON:** The Task Group felt it was logical to call out the operable parts of the items listed in 1102.9 and its exception, since it is only the operable parts of those items that need to comply. During committee discussion, it was suggested that the sections on receptacles be reorganized to reduce repetition. To do this, the language on “operable parts” in Section 1102.9.1 was added to the main paragraph and removed from the list of items.

Another suggestion was to align the language by changing the phrase from “located at the work surface” to “serve the work surface” similar to what is used for counters. This term aligns with the National Electrical Code which will lead to more uniform enforcement.

The language limiting the required compliance to Sections 309.2 and 309.3 was added to correlate with the approved language in Section 804.6. Without this limitation, the operation requirements (one hand, no tight grasping, pinching, twisting of the wrist) would also be exempted.

**Committee Action for Public Comment 2:**

**REPORT OF HEARING:**

*Modification (if any):*

*Committee Reason:*

**03-10 – 2021 Public Comment 3**

**804.6**

*Proponent:* Marsha Mazz, representing the Terminology Task Group

*Further revise as follows:*

**SECTION 804**

**KITCHENS**

**804.6 Receptacle Outlets Serving Counters in Kitchens.** In kitchens, at least one receptacle outlet serving counters shall comply with Section 309 operable parts. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309 operable parts. Where a work surface is required by Section 804.3, at least one such receptacle...
outlet shall be located at the work surface. All other receptacle outlets serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying with at least one of the following:

1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

**REASON:** This is part of a proposal from the Terminology task group to define the building blocks so that a reference is not required. This public comment is included here because it was part of new text. Please see the complete proposal for additional information.

### Committee Action for Public Comment 3:

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

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Committee Action for First Ballot:

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

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**Report for 03-10–2021**

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**REPORT OF HEARING:**

Modification (if any):

Replace and revise as follows:

**309.1 General.** Operable parts shall comply with Section 309.

**Exceptions:**

1. Receptacle outlets serving a dedicated use.
2. Where two or more receptacle outlets are provided in a kitchen above a length of countertop that is uninterrupted by a sink or appliance, one receptacle outlet shall not be required to comply with this section.
3. In a kitchen, where a clear floor space for a parallel approach cannot be located at a countertop in a corner between appliances, receptacle outlets over the countertop shall not be required to comply with this section provided that the counter area does not exceed 9 square feet (0.835 m²) maximum.
4. Floor receptacle outlets.
5. HVAC diffusers.
6. Controls mounted on ceiling fans.
In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying with at least one of the following:

1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

1102.9 Operable parts. Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls and user controls for security or intercom systems shall comply with Section 309. Exception: Receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1102.9.1.

1102.9.1 Operable Parts Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall comply with at least one of the following:

1. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
2. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
3. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

Staff Note: Approval of this proposal will also delete Figure 309.1 OPERABLE PARTS – EXCEPTION 3.

Committee Reason: The requirements for shared kitchens and Accessible units are consistent with what the committee approved for Type A and Type B units. This addressed the concerns for access to electrical outlets for persons using the kitchen. There were several proposals that tried to address questions about appliances sticking out past the cabinet depth, countertop drip edge, what are appropriate allowances. This will allow good kitchen design for all elements in the space and will provide good accessibility.

BALLOT COMMENT 1 – FIRST DRAFT:
Proponent: Kimberly Paarberg
Desired Action: Affirmative with comment
Modification:
Further revise as follows:

309.1 General. Operable parts shall comply with Section 309.

Exceptions:
10. Receptacle outlets serving a dedicated use.
11. Floor receptacle outlets.
12. HVAC diffusers.
13. Controls mounted on ceiling fans.
14. Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to comply with this section.
15. Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
16. Electrical panelboards shall not be required to comply with Section 309.4.
17. Emergency aid devices, such as fire department hose connections, valve controls, gauges, police call boxes and annunciator panels shall not be required to comply with this section provided that they are used only for emergencies by emergency personnel acting in their official capacity.
18. Other than within or serving dwelling or sleeping units, receptacle outlets serving counters in kitchens shall not be required to comply with Section 309 where they comply with Section 804.6.

804.6 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying with at least one of the following:

4. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
5. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
6. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

### 1102.9 Operable parts

Operable parts of Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls and user controls for security or intercom systems shall comply with Section 309.

**Exception:** Receptacle outlets serving counters in kitchens shall be permitted to comply with Section 1102.9.1.

### 1102.9.1 Receptacle Outlets Serving Counters in Kitchens

In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall comply with at least one of the following:

- Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
- Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
- Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

**Reason:**

I strongly support the work done by the Reach Over Counter Task Group. I have a suggestion that I believe is editorial to remove redundant language. Since the committee voted to approve the requirements for 309.1 and 1102.9.1 to be the same, there is no need to repeat the information.

### BALLOT COMMENT 2 - FIRST DRAFT

**Proponent:** Kimberly Paarlberg

**Desired Action:** Affirmative with comment

**Modification:**

Further revise as follows:

#### 309.1 General

Operable parts shall comply with Section 309.

**Exceptions:** The operable parts of the following are not required to comply with Section 309:

- Receptacle outlets serving a dedicated use.
- Floor receptacle outlets.
- HVAC diffusers.
- Controls mounted on ceiling fans.
- Where redundant controls other than light switches are provided for a single element, one control in each space shall not be required to comply with this section.
- Reset buttons and shut-offs serving appliances, piping and plumbing fixtures.
- Electrical panelboards shall not be required to comply with Section 309.4.
- Emergency aid devices, such as fire department hose connections, valve controls, gauges, police call boxes and annunciator panels shall not be required to comply with this section provided that they are used only for emergencies by emergency personnel acting in their official capacity.
- Other than within or serving dwelling or sleeping units, receptacle outlets serving counters in kitchens shall not be required to comply with Section 309 where they comply with Section 804.6.

#### 804.6 Receptacle Outlets Serving Counters in Kitchens

In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall not be required to comply with Sections 309.2 and 309.3 where complying with at least one of the following:

- Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
- Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
- Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

### 1102.9 Operable parts

Operable part of Lighting controls, electrical panelboards, electrical switches and receptacle outlets, environmental controls, appliance controls, plumbing fixture controls and user controls for security or intercom systems shall comply with Section 309.

**Exception:** Receptacle outlets serving counters in kitchens shall be permitted to comply with Section...
1102.9.1 Receptacle Outlets Serving Counters in Kitchens. In kitchens, at least one receptacle outlet serving counters shall comply with Section 309. Where two or more receptacle outlets serving counters are provided, at least two shall comply with Section 309. Where a work surface is required by Section 804.3, at least one such receptacle outlet shall be located at the work surface. All other receptacle outlets serving the counters shall comply with at least one of the following:

4. Operable parts of receptacle outlets shall be 44 inches maximum above the floor.
5. Operable parts of receptacle outlets located on the side wall over the counter shall be 48 inches maximum above the floor and 15 inches maximum from front edge of the counter.
6. Operable parts of receptacle outlets located at the face of the upper cabinets shall be 54 inches maximum from the floor and 15 inches maximum from the front edge of the counter and with a forward plug insertion.

Reason: Comment 2 – 309.1 and 1102.9 – adding ‘the operable parts’ at the beginning of the exception in the exceptions to 309.1 and the first sentence to Section 1102.9 just makes the requirements more precise and consistent with the reference to Section 309.

This would be consistent with the committee action on 03-16-2021. There will be a similar proposal for 1103.9 (10-03) and 1104.9.

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03-16 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

03- 16 – 2021

309.3

**Proponent:** Marsha Mazz, United Spinal Association

Revise as follows:

**SECTION 309
OPERABLE PARTS**

309.3 **Height.** Operable parts shall be placed within one or more of the reach ranges specified in Section 308 and, unless otherwise specified, no portion of the operable part necessary for operation shall be located outside the reach range.

**REASON:** This proposal clarifies a long-standing disagreement within the community of experts – some measure to the centerline and others measure to the top of the control. By including the words “necessary for operation” we mean to allow a portion of the control to be beyond the reach range only if the portion that is outside the reach range allows for operation i.e., meeting the operating force requirements and works reliably to accomplish the task. Please also see our proposal to modify Section 604.6 to address a similar issue that arises when dual flush controls are located so that they are not entirely on the “open side” of the water closet.

03- 16 – 2021 Replacement

309.3

**Proponent:** Marsha Mazz, United Spinal Association and Kimberly Paarlberg, ICC

Replace and revise as follows:
**operable part:** A component of an element used to insert or withdraw objects, or to activate, deactivate or adjust the element (see Section 309).

**SECTION 309**
**OPERABLE PARTS**

**309.3 Height.** Operable. All portions of operable parts required for use or operation shall be placed located within one or more of the reach ranges specified in Section 308.

___

**Reason:**

**Measuring to Operable Parts**

Based on its definition, an Operable Part can be “a component of an element used to … activate [or] deactivate … the element.” The openings in the face of a receptacle that accept the prongs of a plug meet this definition. The intent is to measure to the highest opening of a receptacle, regardless of orientation, as depicted by the line in the following figure. If clarification of this intent is necessary, it should be done consistently for operable parts throughout the standard.

![](image)

The Terminology Task Group is currently reviewing an idea to use defined terms to clarify the intent of the provisions for building blocks so we don’t have to add “in compliance with Section …” after the use of every use of a building block. If the committee agrees with this approach, it is hoped that this could be an editorial committee item.

___

**Committee Action:** Approval as Modified 30-1-1

**REPORT OF HEARING:**

**Modification (if any):**

Replace and revise as follows:

**operable part:** A component of an element used to insert or withdraw objects, or to activate, deactivate or adjust the element (see Section 309).
### SECTION 309
OPERABLE PARTS

**309.3 Height.** Operable All portions of operable parts required for use or operation shall be placed located within one or more of the reach ranges specified in Section 308.

**Committee Reason:** The proposal provides a more specific measurement point. This should answer many field measurement questions, and improve consistent application for requirements.

---

**03-16 – 2021 Ballot Comments**

| BALLOT COMMENT 1- FIRST DRAFT: |
| Proponent: Kevin Brinkman, NEII |
| Desired Action: Negative with comment |
| Modification: |
| Reason: While this change seems minor, there could be many product designs that have been used successfully for many years, that could now be obsolete because the operable parts need to be moved by a fraction of an inch. I do not believe the rationale provides sufficient justification to make this change that could potentially impact many designs. |

---

**Committee Action for First Ballot:**

**REPORT OF HEARING:**

**Modification (if any):**

| Report for 03-16– 2021 |
| Committee decision: AM | Committee Vote at Meeting: 30-1-1 | Committee Vote on Ballot: 42-1-2 |
| REPORT OF HEARING: |
| Modification (if any): |
| Replace and revise as follows: |
| operable part: A component of an element used to insert or withdraw objects, or to activate, deactivate or adjust the element (see Section 309). |

| SECTION 309 |
| OPERABLE PARTS |

| 309.3 Height. Operable All portions of operable parts required for use or operation shall be placed located within one or more of the reach ranges specified in Section 308. |
| Committee Reason: The proposal provides a more specific measurement point. This should answer many field measurement questions, and improve consistent application for requirements. |

---

**BALLOT COMMENT 1- FIRST DRAFT:**

<p>| Proponent: Kevin Brinkman, NEII |
| Desired Action: Negative with comment |
| Modification: |
| Reason: While this change seems minor, there could be many product designs that have been used successfully for many years, that could now be obsolete because the operable parts need to be moved by a fraction of an inch. I do not believe the... |</p>
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BC= Ballot Comment, PC= Public comment, Bold Comment number is proposed

revision below

03-17 – 2021

309.4

Proponent: Peter A. Stratton, Steven Winter Associates, Inc.

Add new text as follows:

SECTION 309
OPERABLE PARTS

309.4 Operation. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5.0 pounds (22.2 N) maximum.

Exception Exceptions:
1. Gas pump nozzles shall not be required to provide operable parts that have an activating force of 5.0 pounds (22.2 N) maximum.
2. Access hatches for waste and linen chutes where such hatches are required to be fire-resistance rated shall not be required to provide an opening force of 5.0 pounds (22.2 N) maximum.

Reason: Access hatches for waste and linen chutes are currently not specifically addressed by the Standard. Some consider access hatches to be an operable part and therefore subject to 5 lb max opening force; others consider these access hatches to be exempt from the 5 lb max opening force because they are fire rated. Access hatches for waste and linen chutes are typically part of a fire assembly. As such, they must close to ensure fire safety; some do not close entirely when limited to 5 lbs of max. opening force and therefore fire safety can be compromised. It seems appropriate to include an exception for opening force under Section 309.1, Operable Parts.

Steven Winter Associates, Inc. recently had a tech notes on this subject will may be helpful for solution options. https://www.swinter.com/party-walls/accessibility-tech-notes-trash-chute-closet-
Committee Action: 18-6-7 Disapproval

REPORT OF HEARING:
Modification (if any):

Committee Reason: A waste and linen chute door is not intended for user passage, therefore the closing force exception for fire doors is not applicable. More input is needed from manufacturers on other options for chute doors.

03-17 – 2021 Ballot Comments

**BALLOT COMMENT 1- FIRST DRAFT:**
Proponent: Doug Anderson, AHLA
Desired Action: Negative with Comment
Modification:

Reason: Fire safety issue. Limited products on the market achieve this and not sure how they perform over time.

Staff Note: See 09-05-2021 for laundry chutes.

Committee Action for First Ballot:

REPORT OF HEARING:
Modification (if any):
Committee Reason:
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CHAPTER 4
ACCESSIBLE ROUTES

04-04 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-04 – 2021
403.5, 403.5.3, 403.5.3.1, 403.5.3.2

Proponent: Kimberly Paarlberg, International Code Council

Revise as follows:

SECTION 403
WALKING SURFACES

403.5 Clear width. The clear width of an accessible route shall comply with Section 403.5.1. 403.5.2, or 403.5.3 or 403.5.4 as applicable.

**403.5.1 General.** The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

Exceptions:

1. In new buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.

2. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum...
provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

3. The clear width of an exterior accessible route located within seating areas shall be 36 inches (915 mm) minimum.

4. The clear width of an exterior ramp shall comply with Section 405.5.

403.5.2 Clear width at 180-degree turn.

403.5.2.1 New buildings and facilities. In new building and facilities, where an accessible route makes a 180-degree turn around an object that is equal to or greater than 52 inches (1320 mm) in width, the clear widths in the turn shall comply with Section 403.5.3.1. Where an accessible route makes a 180-degree turn around an object that is less than 52 inches (1320 mm) in width, the clear widths approaching the turn, during the turn and leaving the turn, shall be one of the following sets of dimensions:

1. Approaching width is 36 inches (915 mm) minimum, during width is 60 inches (1525 mm) minimum, and leaving width is 36 inches (915 mm) minimum.
2. Approaching width is 42 (1065 mm) inches minimum, during width is 48 inches (1220 mm) minimum, and leaving width is 42 (1065 mm) inches minimum.
3. Approaching width is 43 inches (1090 mm) minimum, during width is 43 inches (1090 mm) minimum, and leaving width is 43 inches (1090 mm) minimum.

403.5.2.2 Existing buildings and facilities. In existing buildings and facilities, where an accessible route makes a 180-degree turn around an object that is less than 48 inches (1220 mm) in width, clear widths shall be 42 inches (1065 mm) minimum approaching the turn, 48 inches (1220 mm) minimum during the turn, and 42 inches (1065 mm) minimum leaving the turn.

**Exception:** This section shall not apply where the clear width during the turn is 60 inches (1525 mm) minimum.

403.5.3 Clear width at 90-degree turn.

403.5.3.1 New buildings and facilities. In new buildings and facilities, where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be one of the following sets of dimensions:

1. Both legs of the turn shall be 40 inches (1015 mm) minimum in width. The width of each leg of the turn shall be maintained for 28 inches (710 mm) minimum from the inner corner.
2. Where the interior corners of the turn are chamfered for 8 inches minimum (205 mm) along both walls, both legs of the turn shall be 36 inches (915 mm) minimum in width.
3. Where one leg of the turn is 42 inches (1065 mm) minimum in width, the other shall be permitted to be 38 inches (965 mm) minimum in width.
4. Where one leg of the turn is 44 inches (1120 mm) minimum in width, the other shall be permitted to be 36 inches (915 mm) minimum in width.
**Exceptions:**

1. Where an accessible route makes a 90-degree turn at doors, doorways and gates complying with Section 404.2.3, the route shall not be required to comply with this section.

2. Where an accessible route makes a 90-degree turn at an elevator or platform lift complying with Sections 407 through 410, the accessible route shall not be required to comply with this section.

**403.5.3.2 Existing buildings and facilities.** In existing buildings and facilities, where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum.

**403.5.3 403.5.4 Passing space.**

**403.5.3.1 403.5.4.1 New buildings and facilities.** In new buildings and facilities, an accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2.1, provided the base and arms of the T-shaped space extend 52 inches (1320 mm) minimum beyond the intersection.

**403.5.3.2 403.5.4.2 Existing buildings and facilities.** In existing buildings and facilities, an accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either a 60-inch (1525 mm) minimum by 60-inch (1525 mm) minimum space, or an intersection of two walking surfaces that provide a T-shaped turning space complying with Section 304.3.2, provided the base and arms of the T-shaped space extend 48 inches (1220 mm) minimum beyond the intersection.

**REASON:** The intent of this proposal is to remove the 90 degree turn requirement. I believe this is not have the effect the committee thought they were getting. The interpretation is almost impossible to explain and enforce correctly. The explanation to the committee during the deliberation was primarily related to corridors. If a corridor has doors on either side, the door maneuvering clearances (Section 404.2.3.2) would require at least 42” for that corridor. Dr. Steinfeld, at a meeting held after the committee had close to a final approval on the standard, indicated that this 90 degree turn was not an issue at doors – thus the exceptions to Section 403.5.3.1 were added at the very end of the cycle. He indicated that this was for a smooth transition for scooters along a route. If an aisle or corridor serves more than 50 people, the building code requires a minimum width of 44 inches (IBC Section 1018.5 and 1020.3). Thus the only place this requirement would have an impact is for aisles in small mercantile and small assembly spaces. Is it justified to have something that would impact only small business? The spaces are still maneuverable with mobility devices, just not at speed.
The second issue is the understanding and enforcement. This literally has the accessible route requirements stopping and starting every time it goes through a doorway. Also, places where you assume a turn, such as turning under a drinking fountain, dining surface, work surface or sink are not applicable because they are ‘adjoining’ an accessible route – not part of it! The requirements for 90 degree turns would not technically work with alcove provisions or turning into a wheelchair space in assembly seating or into a ! Attached are a couple of general layouts showing where this is applicable.
Example bathroom layout with 90 degree and U-turns.

Example of route requirements in assembly seating.

Committee Action: 19-4-4 Disapproval

REPORT OF HEARING:
Modification (if any):

Committee Reason: The 90 degree turns should remain in the standard. Issues raised about turning into clear floor spaces should be addressed differently.
04-04 – 2021 Ballot Comments

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Kimberly Paarlberg, ICC
Desired Action: Negative with comment
Modification: See Ballot Comment 1

04-04 – 2021 Ballot Comment 1
403.5.3

Proponent: Kimberly Paarlberg, ICC

Replace the proposal with the following:

403.5.3 Clear width at 90-degree turn.

403.5.3.1 New buildings and facilities. In new buildings and facilities, where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be one of the following sets of dimensions:

1. Both legs of the turn shall be 40 inches (1015 mm) minimum in width. The width of each leg of the turn shall be maintained for 28 inches (710 mm) minimum from the inner corner.

2. Where the interior corners of the turn are chamfered for 8 inches minimum (205 mm) along both walls, both legs of the turn shall be 36 inches (915 mm) minimum in width.

3. Where one leg of the turn is 42 inches (1065 mm) minimum in width, the other shall be permitted to be 38 inches (965 mm) minimum in width.

4. Where one leg of the turn is 44 inches (1120 mm) minimum in width, the other shall be permitted to be 36 inches (915 mm) minimum in width.

Exceptions:

1. Where an accessible route makes a 90-degree turn at doors, doorways and gates complying with Section 404.2.3, the route shall not be required to comply with this section.

2. Where an accessible route makes a 90-degree turn at an elevator or platform lift complying with Sections 407 through 410, the accessible route shall not be required to comply with this section.

3. Where an accessible route makes a 90-degree turn into a clear floor space, wheelchair space or maneuvering clearance, the accessible route shall not be required to comply with this section.
403.5.3.2 Existing buildings and facilities. In existing buildings and facilities, where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum.

**REASON:** Reason: According to Dr. Steinfeld, this 90 turn is not an issue as doorways – thus exception 1 and 2 in the current text. Logically, the same would apply where you turn into an alcove, wheelchair spaces in assemble seating or an accessible toilet compartment, or under a sink or work surface. The average designer does not pick up on the nuance that this is for the route, and not where you turn into a clear floor space. If this requirement is going to remain, then this point needs to be clarified in the text.

If you say this does comply, since none of the turns allow for a 36” or 30” width without additional depth for the turn, the alcove and clear floor space provisions would all need to be revised to allow for this.

I would appreciate additional information from Dr. Steinfeld on where this should be required to further refinements can be discusses.
Example A
1. Turn too wide for clear floor space
2. The 16" overlap would not allow for 17" or 25° depth for knee and toe space

Example B
1. Fits width into above but not depth of >24"
2. If you match overlap to front of above you conflict with 40" between counters or 36" corridors
3. I2 this was a drinking fountain or sink that stuck out 4" the overlap would force this out another 4"
Committee Action for Ballot Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

**Report for 04-04-2021**

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<td>Modification: Replace the proposal with the following:</td>
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**403.5.3 Clear width at 90-degree turn.**

**403.5.3.1 New buildings and facilities.** In new buildings and facilities, where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be one of the following sets of dimensions:

1. Both legs of the turn shall be 40 inches (1015 mm) minimum in width. The width of each leg of the turn shall be maintained for 28 inches (710 mm) minimum from the inner corner.

2. Where the interior corners of the turn are chamfered for 8 inches minimum (205 mm) along both walls, both legs of the turn shall be 36 inches (915 mm) minimum in width.

3. Where one leg of the turn is 42 inches (1065 mm) minimum in width, the other shall be permitted to be 38 inches (965 mm) minimum in width.

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**Exceptions:**

1. Where an accessible route makes a 90-degree turn at doors, doorways and gates complying with Section 404.2.3, the route shall not be required to comply with this section.

2. Where an accessible route makes a 90-degree turn at an elevator or platform lift complying with Sections 407 through 410, the accessible route shall not be required to comply with this section.

3. Where an accessible route makes a 90-degree turn into a clear floor space, wheelchair space or maneuvering clearance the
accessible route shall not be required to comply with this section.

403.5.3.2 Existing buildings and facilities. In existing buildings and facilities, where an accessible route makes a 90-degree turn the clear widths approaching the turn and leaving the turn shall be 36 inches (915 mm) minimum.

Reason: According to Dr. Steinfeld, this 90 turn is not an issue as doorways – thus exception 1 and 2 in the current text. Logically, the same would apply where you turn into an alcove, wheelchair spaces in assemble seating or an accessible toilet compartment, or under a sink or work surface.

The average designer does not pick up on the nuance that this is for the route, and not where you turn into a clear floor space. If this requirement is going to remain, then this point needs to be clarified in the text.

If you say this does comply, since none of the turns allow for a 36” or 30” width without additional depth for the turn, the alcove and clear floor space provisions would all need to be revised to allow for this.

I would appreciate additional information from Dr. Steinfeld on where this should be required to further refinements can be discusses.


**04-05 – 2021 overview**

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

**04-05 – 2021**

403.5.1, 403.5.1.1(New), 403.5.1.2(New), 406.2.1, 406.3.1, 406.5.1

**Proponent:** Kimberly Paarlberg, International Code Council

**Revise as follows:**

**SECTION 403**

**WALKING SURFACES**

403.5 **Clear width.** The clear width of an accessible route shall comply with Section 403.5.1, 403.5.2 or 403.5.3 or 403.5.4 as applicable.

403.5.1 **General.**

403.5.1.1 **New buildings and facilities,** In new buildings and facilities, the clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

**Exceptions:**

1. In new buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.

2. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum.
maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

2.3. The clear width of an exterior accessible route located within seating areas shall be 36 inches (915 mm) minimum.

3.4. The clear width of an exterior ramp shall comply with Section 405.5.

403.5.1.2 Existing buildings and facilities. In existing buildings and facilities, the clear width of an interior and exterior accessible route shall be 36 inches (915 mm) minimum.

Exception: The clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

SECTION 405
RAMPS

405.5 Clear width. The clear width of a ramp run shall be 36 inches (915 mm) minimum. Handrails and handrail supports that are provided on the ramp run shall not project into the required clear width of the ramp run.

Exception: Within employee work areas, the required clear width of ramps that are a part of common use circulation paths shall be permitted to be decreased by work area equipment provided that the decrease is essential to the function of the work being performed.

SECTION 406
CURB RAMPS AND BLENDED TRANSITIONS

406.1 General. Curb ramps and blended transitions on accessible routes shall comply with Section 406.

406.2 Perpendicular curb ramps. Perpendicular curb ramps shall comply with Sections 406.2 and 406.5.

406.2.1 Landings. A landing 48 inches (1220 mm) minimum by 48 inches (1220 mm) minimum shall be provided at the top of a curb ramp. The landing shall be permitted to overlap pedestrian routes and clear spaces. Where the landing is constrained at the back-of-sidewalk, the landing shall be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum. The 60-inch (1525 mm) dimension shall be provided in the direction of the curb ramp run. The slope of landings shall be 1:48 maximum in all directions.

Exception: In existing buildings and facilities, the landing shall be 36 inches (915 mm) minimum by 36 inches (915 mm) minimum. Where the landing is constrained at the back-of-sidewalk, the landing shall be 36 inches (915 mm) minimum by 60 inches (1525 mm) minimum.
406.3 Parallel curb ramps. Parallel curb ramps shall comply with Sections 406.3 and 406.5.

406.3.1 Landing. A landing 48 inches (1220 mm) minimum by 48 inches (1220 mm) minimum shall be provided at the bottom of a curb ramp. The landing shall be permitted to overlap pedestrian routes and clear spaces. Where the landing is constrained on two or more sides, the landing shall be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum. The 60 inches (1525 mm) dimension shall be provided in the direction of the pedestrian street crossing. The slope of landings shall be 1:48 maximum in all directions.

Exception: In existing buildings and facilities, the landing shall be 36 inches (915 mm) minimum by 36 inches (915 mm) minimum. Where the landing is constrained on two or more sides, the landing shall be 36 inches (915 mm) minimum by 60 inches (1525 mm) minimum.

406.5 Common requirements. Curb ramps and blended transitions shall comply with Section 406.5.

406.5.1 Width. The clear width of curb ramp runs (excluding any flared sides) and blended transitions shall be 48 inches (1220 mm) minimum.

Exception: In existing buildings and facilities, the clear width of curb ramp runs shall be 36 inches (915 mm) minimum.

REASON: The intent of this proposal is to allow for existing buildings to maintain the current requirement for a 36” accessible route for exterior routes and curb ramps where improvements are required for the accessible route from public arrival points and accessible parking spaces to the building entrance. Where current sidewalks and parking lots exist, asking for the extra width could be extensive and almost impossible to argue technical infeasibility. In addition, while the 48” sizes matches the current PROWAG, that is for public rights of way, and these requirements for on the site. This technical requirement is partially addressed in 2021 IEBC Section 306.7.6, but it is more consistent and within scope to provide that information in the ICC A117.1.

2021 IEBC

306.7.6 Accessible route. Exterior accessible routes, including curb ramps, shall be not less than 36 inches (914 mm) minimum in width.

The format would be consistent with the Sections 403.5.2 Clear width at 180-degree turn, 403.5.3 Clear width at 90-degree turn and 403.5.4 Passing space. Exterior ramps are already allowed to stay at 36” clear width between handrails for new construction. There is no suggested changes to blended transitions, because those were not in ICC A117.1 before.
Proponent: Rodney Lindsey, representing Larson Karle Architects

Further modify as follows:

406.2 Perpendicular curb ramps. Perpendicular curb ramps shall comply with Sections 406.2 and 406.5.

406.2.1 Landings. A landing 48 inches (1220 mm) minimum by 48 inches (1220 mm) minimum shall be provided at the top of a curb ramp. The landing shall be permitted to overlap pedestrian routes and clear spaces. Where the landing is constrained at the back-of-sidewalk, the landing shall be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum. The 60-inch (1525 mm) dimension shall be provided in the direction of the curb ramp run. The slope of landings shall be 1:48 maximum in all directions.

Exception Exceptions:

1. In existing buildings and facilities, the landing shall be 36 inches (915 mm) minimum by 36 inches (915 mm) minimum. Where the landing is constrained at the back-of-sidewalk, the landing shall be 36 inches (915 mm) minimum by 60 inches (1525 mm) minimum.

2. In alterations, where there is no landing at the top of curb ramps, curb ramp flares shall be provided and shall not be steeper than 1:12.

Reason: In the A117.1-2009, Section 406.7 Landings allowed for 36” of landing depth at the top of curb ramps. Also, there was an Exception that in alterations, where there is no landing at the top of curb ramps, the curb ramp flares shall be provided and shall not be steeper than 1:12. In the A117.1-2017, Section 406.2.1 Landings, it is not clear that the landing at the top of the perpendicular curb ramp is allowed to be 36”, especially for existing conditions, and that Exception for alterations no longer exists. I request that the former Exception be put back into the 2017, and that the landing at the top of the curb ramp be better clarified for existing conditions especially. Also, it would be helpful if IEBC Section 306.7.6 was better coordinated and referenced in the A117.1-2017 for existing conditions.

The purpose of the modification is to help alleviate requirements for the limited constraints of being able to provide a better accessible route to existing elements. In a particular scenario I’m working on currently, we have an existing shopping center (tenant) plaza that has a sidewalk in front of the storefronts with a covered walkway and columns out at the curb side. We are trying to place a new perpendicular curb ramp into this sidewalk, but due to the available width of the walkway, we cannot fit this in due to the A117.1-2017’s 48” landing requirement at the top. And since there is no Exception for the alteration to allow for the flares to be 1:12, we are forced to try to get a parallel curb ramp to work instead, which is also having conflicts/issues due to the columns at the curbside along with needing maneuvering clearances at the doorways. It would be very helpful if the Exception for the alterations was still in the A117.1-2017 along with reference to IEBC Section 307.7.6.
REPORT OF HEARING:
Modification (if any):
The proposed modification to add exception to Section 406.2.1 was approved (22-5-4)
A second modification to strike the entire proposal in 04-05 was approved (15-10-4)
As modified failed (13-15-5)

Committee Reason: The site restrictions outside would allow for technical infeasibility if a 48 inch wide route is not feasible. If there is enough space, the exterior route width should be increased. The parallel curb cuts now in the standard is safer than the curb cuts with the angled sides, so that should be used.

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<td>Proponent: Dug Anderson, AHLA</td>
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<td>Desired Action: Negative with comment</td>
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<td>Modification:</td>
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<td>Reason: Technical infeasibility is not a reliable standard</td>
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| **BALLOT COMMENT 2- FIRST DRAFT:** |
| Proponent: Kim Paarlberg representing ICC |
| Desired Action: Negative with comment |
| Modification: |
| Reason: Request As Submitted. On existing sites there are many situations where requiring a 48” wide route would be an extensive rework of the sidewalk and parking lots. This is currently permitted in the IEBC. Curb cuts should be permitted on existing sidewalks – to the allowance for curb ramp landing needs to match the 36” sidewalk allowance. |

**04-05 – 2021 Public Comment 1**

403.5.1, 403.5.1.1(New), 403.5.1.2(New), 406.2.1, 406.3.1, 406.5.1

Proponent: Kimberly Paarlberg, ICC

Replace with the following:

SECTION 403
WALKING SURFACES

403.5 Clear width. The clear width of an accessible route shall comply with Section 403.5.1. 403.5.2 or 403.5.3 or 403.5.4 as applicable.
403.5.1 General.

403.5.1.1 New buildings and facilities. In new buildings and facilities, the clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

Exceptions:

1. In new buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.

2. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

2.3. The clear width of an exterior accessible route located within seating areas shall be 36 inches (915 mm) minimum.

3.4. The clear width of an exterior ramp shall comply with Section 405.5.

403.5.1.2 Existing buildings and facilities. In existing buildings and facilities, the clear width of an interior and exterior accessible route shall be 36 inches (915 mm) minimum.

Exception: The clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

SECTION 405
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Exception: Within employee work areas, the required clear width of ramps that are a part of common use circulation paths shall be permitted to be decreased by work area equipment provided that the decrease is essential to the function of the work being performed.

SECTION 406
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406.1 General. Curb ramps and blended transitions on accessible routes shall comply with Section 406.
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406.2.1 Landings. A landing 48 inches (1220 mm) minimum by 48 inches (1220 mm) minimum shall be provided at the top of a curb ramp. The landing shall be permitted to overlap pedestrian routes and clear spaces. Where the landing is constrained at the back-of-sidewalk, the landing shall be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum. The 60-inch (1525 mm) dimension shall be provided in the direction of the curb ramp run. The slope of landings shall be 1:48 maximum in all directions.

Exceptions:

1. In existing buildings and facilities, the landing shall be 36 inches (915 mm) minimum by 36 inches (915 mm) minimum. Where the landing is constrained at the back-of-sidewalk, the landing shall be 36 inches (915 mm) minimum by 60 inches (1525 mm) minimum.
2. In alterations, where there is no landing at the top of curb ramps, curb ramp flares shall be provided and shall not be steeper than 1:12.

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406.3.1 Landing. A landing 48 inches (1220 mm) minimum by 48 inches (1220 mm) minimum shall be provided at the bottom of a curb ramp. The landing shall be permitted to overlap pedestrian routes and clear spaces. Where the landing is constrained on two or more sides, the landing shall be 48 inches (1220 mm) minimum by 60 inches (1525 mm) minimum. The 60 inches (1525 mm) dimension shall be provided in the direction of the pedestrian street crossing. The slope of landings shall be 1:48 maximum in all directions.

Exception: In existing buildings and facilities, the landing shall be 36 inches (915 mm) minimum by 36 inches (915 mm) minimum. Where the landing is constrained on two or more sides, the landing shall be 36 inches (915 mm) minimum by 60 inches (1525 mm) minimum.

406.5 Common requirements. Curb ramps and blended transitions shall comply with Section 406.5.

406.5.1 Width. The clear width of curb ramp runs (excluding any flared sides) and blended transitions shall be 48 inches (1220 mm) minimum.

Exception: In existing buildings and facilities, the clear width of curb ramp runs shall be 36 inches (915 mm) minimum.

REASON: This replacement picks up the modification proposed by Rodney Lindsey. It is also important to note that 04-06 took out the exception for exiting buildings. If the A117.1 committee approves 04-05 and 04-06, I am assuming the exceptions for routes can be coordinated.
There are many exterior accessible routes where it would be difficult, if not impossible, to argue technical infeasibility. ‘Technically infeasible’ when it comes to site constraints, other than public streets, is too open for different interpretations.

Widening a sidewalk up against the front of the building could have significant impact on proper drainage for the site; or could reduce the number of parking spaces on the site by affecting the length of parking spaces or the depth of the aisles between rows of parking spaces—thus becoming a zoning issue. The 48” was developed for public right-of-way where the anticipated use is heavy and bounded on each side by streets or buildings. While this additional width on a site is fairly easy to achieve in new construction, it can have a significant impact on existing building – the tighter the site, the greater the issue.

_____

Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-05 Paarlberg.doc

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

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04-06 – 2021 overview

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BC= Ballot Comment, PC= Public comment, Bold Comment number is proposed revision below

04-06 – 2021
403.5.1, 404.2.3

Proponent: Marsha Mazz representing United Spinal Association

Revise as follows:

SECTION 403
WALKING SURFACES

403.5.1 General. The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

Exceptions:
1. Each side of the clear width of an accessible route shall be permitted to be reduced in accordance with the following dimensions:
   a. A reduction of 1 1/2 inches (38 mm) to a height of 1-inch (25 mm) maximum above the floor;
   b. A reduction of 1-inch (25 mm) to a height of 7 inches (180 mm) maximum above the floor; and
   c. A reduction of 2 inches (50 mm above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by a clear floor space complying with Section 305.3.
2. In new buildings and facilities, the clear width shall be permitted to be reduced to 32
inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.

2. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

3. The clear width of an exterior accessible route located within seating areas shall be permitted to be 36 inches (915 mm) minimum.

4. The clear width of an exterior ramp shall be permitted to comply with Section 405.5.

SECTION 404
DOORS, DOORWAYS AND GATES

404.2.3 Maneuvering clearances. Minimum maneuvering clearances at doors and gates shall comply with Section 404.2.3. Maneuvering clearances shall include the full clear opening width of the doorway and the required latch-side or hinge-side clearance.

Exception: Baseboards and other trim elements shall be permitted to project into the maneuvering clearance 1 ½ inches (38 mm) maximum to a height of 1-inch maximum above the floor and 1-inch (25 mm) maximum above a height of 1-inch (25mm) to a height of 7 inches (180 mm) maximum above the floor.

REASON: This proposal is intended to resolve the question as to whether an accessible route or a maneuvering clearance at a door should be measured above baseboards and trim. Space for a stationary wheelchair is 30 inches in width. The additional 6 inches of width on an accessible route is intended to accommodate the arms of a person propelling a wheelchair as well as some sway in the trajectory because most users do not exert exactly the same amount of force on both wheels. We believe that narrowing the route at a moderate baseboard height will not impact the usability of the route and will prevent future conflicts that can result in unnecessary expense.

This proposal also simplifies existing exceptions 1 & 2 by referencing the length of a clear floor space in Section 305.3. We have another proposal to delete the differing space criteria in new and existing facilities. Regardless of whether that passes or fails, this change will not, on its own, change the requirement. Exceptions 3 and 4 in the current standard are renumbered and revised to conform to the format used in the Standards for exceptions.

Committee Action: AS 17-8-2

REPORT OF HEARING:
Modification (if any):

Committee Reason: The committee agreed that it is not the intent to measure the accessible route between baseboards at the floor. There have been multiple reports of reviewers siting violations for this. Modifications can be addressed in the 2nd round.
The basic idea of not measuring the route between baseboards is appropriate, but there are several series issues with the text as currently written. Exception 1 C would only allow 2” on each side, and the current route allowances is to go down to 32” – so this would allow two inches from each side, but not a 4” deep column on one side. Exception 1, a, b and c do not work together horizontally – even though this is written as working together (e.g. a 2” protrusion could not extend floor to ceiling). Exception 1C does not have a height limit at the top end – so this could be read as applying all the way to the ceiling. The changes for 405.3.1 are the width of the route while the changes to 404.2.3 are a depth to the clear floor space – is this permitted on only one side of the clearance, two sides or three sides? That needs to be clarified. If the clearance goes all the way to the full height of the door, what about other projections like light switches or room signs?

04-06 – 2021 Ballot Comments

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<tr>
<td>Proponent: Doug Anderson, AHLA</td>
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<td>Reason: I agree the measurement should be taken at the floor and not above the baseboard. The proposed modifications to the exceptions are unnecessarily complex and will lead to confusion.</td>
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<td>Proponent: Ken Schoonover, Individual Member</td>
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<td>Desired Action: Affirmative with comment</td>
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<td>Modification: See Ballot Comment 5</td>
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04-06 – 2021 Ballot Comment 3
403.5.1
Proponent: Kimberly Paarlberg, ICC

Further modify the proposal as follows:

SECTION 403
WALKING SURFACES

403.5.1 General. The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

Exceptions:
1. Each side of the clear width of an accessible route shall be permitted to be reduced in accordance with the following dimensions:
   a. A reduction of 1 1/2 inches (38 mm) to a height of 1-inch (25 mm) maximum above the floor;
   b. A reduction of 1-inch (25 mm) to a height of 7 inches (180 mm) maximum above the floor; and
   c. A reduction of 2 inches (50 mm) above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by a clear floor space complying with Section 305.3.
2. In new buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.
3. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

2-4. The clear width of an exterior accessible route located within seating areas shall be permitted to be 36 inches (915 mm) minimum.

3-5. The clear width of an exterior ramp shall comply with Section 405.5.

REASON: This is in response to the committee’s comments during discussion. While I totally agree with the intent of 04-03 and 04-06, Exception 1 in Section 403.5.1 is way too complicated for measuring baseboards and toe kicks. The change to 404.2.3 addresses baseboards, but not the trim around the door for door maneuvering clearances – we need to allow for both. In addition - the proposed language as currently approved also conflicts with the current option for columns, doorways or pilasters for reductions on one side instead of both sides (403.5.1 Exception 2 and 3). This first comment puts back the option for the column or doorway option for items moving into the route on one side and for items such as columns, doorways or items taller than 7 inches. Also, as you roll down the hall, you go past a lot of doorways with trim on both sides.

Committee Action for Ballot Comment 3:

REPORT OF HEARING:
Further modify the proposal as follows:

SECTION 403
WALKING SURFACES

403.5.1 General. The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum. Where confined by walls, the clear width of the accessible route shall be measured to adjacent walls above baseboards that are 7 inches or less in height.

Exceptions:
1. Each side of the clear width of an accessible route shall be permitted to be reduced in accordance with the following dimensions:
   a. A reduction of 1-1/2 inches (38 mm) to a height of 1-inch (25 mm) maximum above the floor;
   b. A reduction of 1-inch (25 mm) to a height of 7 inches (180 mm) maximum above the floor; and
   c. A reduction of 2 inches (50 mm) above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by a clear floor space complying with Section 305.3.

2.1 The clear width of an exterior accessible route located within seating areas shall be permitted to be 36 inches (915 mm) minimum.

3.2 The clear width of an exterior ramp shall be permitted to comply with Section 405.5.

SECTION 404
DOORS, DOORWAYS AND GATES

404.2.3 Maneuvering clearances. Minimum maneuvering clearances at doors and gates shall comply with Section 404.2.3. Maneuvering clearances shall include the full clear opening width of the doorway and the required latch-side or hinge-side clearance. Such maneuvering clearances shall be measured to walls and exclusive of baseboard that are 7 inches or less in height and door trim that is 4-1/2” or less in width.
Exception: Baseboards and other trim elements shall be permitted to project into the maneuvering clearance 1 ½ inches (38 mm) maximum to a height of 1 inch maximum above the floor and 1 inch (25 mm) maximum above a height of 1 inch (25 mm) to a height of 7 inches (180 mm) maximum above the floor.

REASON: The modification would provide an option that would measure above the baseboards without having to go into the extreme measurement details. Yes, you can do super fancy baseboards that are higher or thicker than standard, but that is exceptionally rare. If this is needed, the dimensions included in the proposal could be included (or not). When rolling down the hall you pass a lot of doors, but there the door trim can be excluded if the existing exceptions are restored. In 11-14, for clearances at kitchens the committee approved “measured at the narrowest point, excluding hardware and appliance controls”. We could say something as simple as that for baseboards and door trim.

Committee Action for Ballot Comment 4:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-06 – 2021 Ballot Comment 5
403.5.1

Proponent: Ken Schoonover

Further revise as follows:

SECTION 403
WALKING SURFACES

403.5.1 General. The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

Exceptions:
1. Each side of the clear width of an accessible route shall be permitted to be reduced in accordance with the following dimensions:
   1.1. A reduction of 1 1/2 inches (38 mm) maximum to a height of 1-inch (25 mm) maximum above the floor;
1.2. A reduction of 1-inch (25 mm) maximum to a height of 7 inches (180 mm) maximum above the floor; and
1.3. A reduction of 2 inches (50 mm) maximum above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by a clear floor space complying with Section 305.3.

2. The clear width of an exterior accessible route located within seating areas shall be permitted to be 36 inches (915 mm) minimum.

3. The clear width of an exterior ramp shall be permitted to comply with Section 405.5.

**REASON:** The language literally limits the reductions in Exception 1 to only those absolute dimensions. Further modify the proposal to make the reduction dimensions maximums.

**Committee Action for Ballot comment 5:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

04-06 – 2021 Public Comment 1

403.5.1

**Proponent:** Kimberly Paarlberg, ICC

Further revise as follows:

**SECTION 403**

**WALKING SURFACES**

403.5.1 **General.** The clear width of an interior accessible route shall be 36 inches (915 mm) minimum.

The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

**Exceptions:**

1. **Each side of the** The clear width of an interior accessible route shall be permitted to be reduced in accordance with 1.1 and 1.2 or in accordance with 1.3 **of the following dimensions:**

   1. **1.1.** A reduction of 1 1/2 inches (38 mm) to a height of 1-inch (25 mm) maximum above the floor **shall be permitted on each side of the clear width.**
1.2. A reduction of 1-inch (25 mm) to a height of 7 inches (180 mm) maximum above the floor shall be permitted on each side of the clear width; and

1.3. A maximum aggregate reduction of 4 inches (100 mm) above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by the length of a clear floor space complying with Section 305.3.

2. The clear width of an exterior accessible route shall be permitted to be reduced in accordance with the following dimensions:

2.1. A reduction of 1 1/2 inches (38 mm) to a height of 1-inch (25 mm) maximum above the floor shall be permitted on each side of the clear width;

2.2. A reduction of 1-inch (25 mm) to a height of 7 inches (180 mm) maximum above the floor shall be permitted on each side of the clear width; and

2.3. A maximum aggregate reduction of 8 inches (205 mm) above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by the length of a clear floor space complying with Section 305.3. The reductions permitted in items a or b of this exception shall not be permitted where it would result in the clear width being less than 32 inches (815 mm).

3. The clear width of an exterior accessible route located within seating areas shall be permitted to be 36 inches (915 mm) minimum.

4. The clear width of an exterior ramp shall be permitted to comply with Section 405.5.

REASON: Since this section addresses both interior and exterior accessible routes – which have different width requirements – the committee draft as well as the existing text in the 2017 standard create a problem where the general widths can be reduced. In addition, as was suggested by proposal 04-05 that the section should address existing exterior routes so the previously permitted 36-inch width is accepted (2009 A117.1 Section 403.5 and federal 2010 Standard for Accessible Design Section 403.5.1).

The revisions as currently shown in the draft make no sense and create a situation which seems to be contrary to the stated intent of the proponent in their reason statement. There are several concerns with how this text can be read and then applied or misapplied.

1. If the intent is to allow the “baseboards and trim” to extend into the clear width of the accessible route, then why are they limited to a projection of either 1 or 1-1/2 inches (up to a height of 7 inches) and yet above 7 inches a reduction of 2 inches is permitted? This text as currently written could imply that the protruding element at the higher elevation can extend out beyond the baseboard and trim. (e.g., While the 36” route can be reduced down to 32” above the 7-inch elevation, the baseboard and trim beneath that would require a 33” distance between the quarter-rounds and a 34” distance between the baseboards based on the 1-1/2 or 1-inch reductions listed. 36” – (1 ½ x 2) = 33” and 36” – (1 x 2) = 34”. That clearly is not the intent but by putting all three items in one exception it can be read that way.)
2. In addition, by referencing that the reduced width segments must be “separated by a clear floor space complying with Section 305.3” it would appear that the accessible route itself would only need to be 30 inches in width and either 52 or 48 inches in length where it is located between the reduced width segments. Therefore, the wording should be modified to require the reduced width segments to be separated by “the length of” a clear floor space so it is clear the width of the accessible route may not be reduced within that intermediate segment.

3. Another concern is that based on the proponent’s reason statement that the “Space for a stationary wheelchair is 30 inches in width” it would seem appropriate to prohibit the use of the baseboard and trim exceptions (items a and b in Exception 1) from being used where the width of the accessible route is being reduced to 32 inches (item c in Exception 1). As it is currently shown in the draft, it could be argued that the 32-inch reduced width segment could be further reduced by the baseboard and trim exemption and therefore provide only 29-inch clearance at the quarter-round and a 30-inch clearance at the baseboard. It simply seems that if the argument is that the wheelchair space is required to be 30-inches in width, that allowing a 29 or 30-inch clearance at the baseboard and trim level would either stop a user from being able to pass through the space or that we have made it where they must be perfectly aligned to get through. I have drafted this portion of my modification to prohibit the added reduction at the floor level. If the committee is OK with accepting the baseboard and trim encroaching into that reduced distance, then the proposed modification should be changed to indicate that it is permissible to combine the exceptions. Having that type of clarity will help eliminate confusion as to whether all the reductions can be used together. I assume that the baseboard and trim exceptions are intended to be allowed within the reduced width segment, so it that is the committee’s intent, then my modification should be revised to indicate that it is permissible to combine the various items. Regardless of the committee’s viewpoint, I simply think it should be clearly addressed.

4. In the “option 1” modification the previous Item c in Exception 1 has been moved to become Exception 2 and revised so that it simply states the 32-inch width that the route is required to be. In the “option 2” modification it will split the interior and exterior reductions and increase the reduction for the exterior routes. As is currently proposed in the draft (Item c in proposed Exception 1 allowing a 2-inch reduction on each side), the reduction for the limited distance will allow an interior route the traditional 32-inch clearance that the standards have used for years. However, it will only permit the exterior route to be reduced to a 44-inch clearance for the 24-inch distance. There has not been any substantiation given as to why the previously permitted 32” reduced width for the exterior accessible route is not acceptable – and this technical change appears to have been made without any discussion. This is one of the problems of having both the interior and exterior route provisions within one section and then applying the exceptions to both types of accessible routes.

The apparent intent to limit exterior accessible routes to a 44-inch minimum will also create a problem for existing exterior routes which have been built to the 36-inch
width which was permitted by the A117.1 standard prior to the 2017 edition and the current requirements of the ADA 2010 Standards for Accessible Design. The committee draft’s proposed item c in Exception 1 will create additional problems for existing exterior routes since the 44-inch width at this point of reduced clearance would not only exceed the existing 36-inch width which may have been used, but it may also require the need for unintended alterations to be made. An example to illustrate this problem would be the existing gap between the pole for a streetlight and a bus shelter. While that gap may meet the previously permitted 36-inch width (or possibly the previously accepted 32-inch reduced clearance width), it would mean that either the shelter or the streetlight would need to be moved so that the newly specified 44-inch width could be provided.

5. As pointed out in item 4 above there is a problem with the current draft not addressing existing exterior routes. I have added a new exception 5 which helps address the concerns of existing exterior routes which were built to the 36-inch width and are not being altered. This helps address some of the problems pointed out in comment 4 above and addresses the part of the intent of proposal 04-05 so that the existing exterior routes can remain in compliance and not require an alteration simply due to the specified width of the route being increased to 48 inches.

The standard should specifically permit existing exterior routes, which are not being altered, to remain at the previously permitted 36-inch width. As the draft is currently written, all exterior accessible routes would be expected to be 48 inches in width, which would force all previously compliant 36-inch routes to be increased – regardless of the fact that there were no modifications being made and possibly regardless of whether that is possible (since we don’t have any of the text similar to the federal requirements about “unless technically infeasible”).

6. It is not appropriate to limit the 2-inch reduction to “each side.” While a total reduction for a 36-inch interior accessible route should not allow the clear width to be reduced to less than 32 inches for the limited 24-inch distance, there truly is no reason that at reduction above the baseboard elevation should need to be equal or limited to “each side.” As an example, if a corridor or hallway has a pilaster or perhaps a compliant protruding object such as a fire extinguisher projection from one wall, then the accessible route still provides the required traditional 32-inch clearance around that obstructing element. The important thing here is that the route maintains the required minimum width, not that they be applied equally to “each side.” Given the current draft provision limiting the protrusion to “each side” it would require that a corridor or other accessible route be widened out from the normal 36-inch width in order to allow a compliant projection to be installed on one side of the accessible route. Because the “reduction” would only allow 2 inches “on each side” a corridor or hallway would need to be constructed at least 38 inches in width in order to allow what has always been an acceptable protruding element (such as a display case, fire extinguisher, pilaster, etc.) to be placed on one side and not exceed the maximum 2-inch reduction on that side. The important thing is the width of the route, not whether it is equally spaced from the two sides.
I am providing the committee with two possible options to review and consider addressing these concerns with the current draft of the standard. I personally think Option 1 is the better choice since it separates the baseboard and trim requirements from the general 32-inch route provision. It also eliminates some of the repetitive language caused by simply creating the separate interior and exterior exceptions. One additional option if the committee does not like either of these options would be to split the base paragraph’s basic interior and exterior route requirements and the appropriate exceptions into separate paragraphs or separate sections so the requirements are clear and limited for both the interior and exterior provisions.

Having looked at the various proposals, while I do not like the committee’s draft, it is apparent that the current standard is flawed and that some type of revision must be made to this section. Having both the 36-inch interior and 48-inch exterior width requirements within a single section and attempting to use the single set of exceptions leads to several issues. While the previously existing Exception 1 will permit the reduction to a minimum 32-inch width for both the interior and exterior routes, it could also be read to permit an exterior route to be dropped to 36 inches provided it was located between two reduced clearance locations. Without additional guidance or limitations this would override the general 48-inch exterior route requirement simply because a reduced width entry and exit point was provided. I believe the intent of both the PROWAG and the A117.1 standard (as shown in A117.1 Figure 403.5.1(D)) is that exterior routes should be 48 inches in width with limited reductions down to the 32-inch clearance. One possible solution here is for the previously existing exception 1 to be revised to limit the 36-inch width for interior routes and add that exterior routes must be 48 inches minimum in width between the reduced width segments.
Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-06 – 2021 Public Comment 2
404.2.3

Proponent: Peter Stratton, Steven Winter Associates, Inc.

Further revise as follows:
SECTION 404
DOORS, DOORWAYS AND GATES

404.2.3 Maneuvering clearances. Minimum maneuvering clearances at doors and gates shall comply with Section 404.2.3. Maneuvering clearances shall include the full clear opening width of the doorway and the required latch-side or hinge-side clearance.

**Exception Exceptions:**
1. Vertical door trim is permitted to project into the maneuvering clearance 1-inch (25 mm) maximum.
2. Baseboards and other trim elements shall be permitted to project into the maneuvering clearance 1 ½ inches (38 mm) maximum to a height of 1-inch maximum above the floor and 1-inch (25 mm) maximum above a height of 1-inch (25mm) to a height of 7 inches (180 mm) maximum above the floor.

**REASON:** Baseboard is not the only molding that projects into maneuvering clearance. Door trim also projects and should be addressed.

Committee Action for Public Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-06 – 2021 Public Comment 3
403.5.1, 404.2.3

Proponent: Kimberly Paarlberg, ICC

Replace the proposal as follows:

SECTION 403
WALKING SURFACES

403.5.1 General. The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum. The clear width shall be measured at a height of 8 inches (203 mm) above the floor surface.

Exceptions:
1. In new buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.

2. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

3. The clear width of an exterior accessible route located within seating areas shall be 36 inches (915 mm) minimum.

4. The clear width of an exterior ramp shall comply with Section 405.5.

SECTION 404
DOORS, DOORWAYS AND GATES

404.2.3 Maneuvering clearances. Minimum maneuvering clearances at doors and gates shall comply with Section 404.2.3. Maneuvering clearances shall include the full clear opening width of the doorway and the required latch-side or hinge-side clearance.

(Note: No exception proposed for this section.)

REASON: For aisles and corridors, there are multiple requirements for maximum protrusions in the means of egress requirements in the building codes, and the width requirements exceed that required for an accessible route as soon as the occupant load exceeds 50.

This standard should not go to the level of detail of measuring baseboards and quarter rounds. The widest part of mobility devices is not at the floor. Give a proper height for measurement when moving down a hallway.

The intent of this public comment is to delete the exception in 404.2.3. For maneuvering clearance, many of us have heard the interpretation from DOJ that the height of this space is 80”. This exception only addresses base boards. What about door trim, light switches, signage, sconces next to the door? This is already addressed. Signage and sconces are limited by protruding object criteria or are not an obstruction to accessing the door. Extensive door trim is addressed by the recessed door provisions.

Committee Action for Ballot Comment 3:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

04-06 Paarlberg.doc
REPORT OF HEARING:

Modification (if any):

Committee Reason:

Report for 04-06—2021

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<th>Committee Vote at Meeting: 17-8-2</th>
<th>Committee Vote on Ballot:36-4-1</th>
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REPORT OF HEARING:
Modification (if any):

Committee Reason: The committee agreed that it is not the intent to measure the accessible route between baseboards at the floor. There have been multiple reports of reviewers siting violations for this. Modifications can be addressed in the 2nd round.

The basic idea of not measuring the route between baseboards is appropriate, but there are several series issues with the text as currently written. Exception 1 C would only allow 2” on each side, and the current route allowances is to go down to 32” – so this would allow two inches from each side, but not a 4” deep column on one side. Exception 1, a, b and c do not work together horizontally – even though this is written as working together (e.g. a 2” protrusion could not extend floor to ceiling). Exception 1C does not have a height limit at the top end – so this could be read as applying all the way to the ceiling. The changes for 405.3.1 are the width of the route while the changes to 404.2.3 are a depth to the clear floor space – is this permitted on only one side of the clearance, two sides or three sides? That needs to be clarified. If the clearance goes all the way to the full height of the door, what about other projections like light switches or room signs?

BALLOT COMMENT 1 - FIRST DRAFT:

| Proponent: Doug Anderson, AHLA |
| Desired Action: Affirmative with comment |

| Modification: |
| Reason: I agree the measurement should be taken at the floor and not above the baseboard. The proposed modifications to the exceptions are unnecessarily complex and will lead to confusion. |

BALLOT COMMENT 2 - FIRST DRAFT:

| Proponent: Dennis Hall representing CSA |
| Desired Action: Negative with comment |

| Modification: |
| Reason: Too complex, keep simple. |

BALLOT COMMENT 3 and 4 - FIRST DRAFT:

| Proponent: Kim Paarlberg representing ICC |
| Desired Action: Negative with comment |

| Modification: |
| Further modify the proposal as follows: |

SECTION 403
WALKING SURFACES

403.5.1 General. The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum.

Exceptions:

1. Each side of the clear width of an accessible route shall be permitted to be reduced in accordance with the following dimensions:
   a. A reduction of 1 1/2 inches (38 mm) to a height of 1-inch (25 mm) maximum above the floor;
   b. A reduction of 1-inch (25 mm) to a height of 7 inches (180 mm) maximum above the floor; and
   c. A reduction of 2 inches (50 mm) above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by a clear floor space complying with Section 305.3.

2. In new buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 52 inches (1320 mm) minimum in length and 36 inches (915 mm) minimum in width.

3. In existing buildings and facilities, the clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided the reduced-width segments are separated by segments that are 48 inches (1220 mm) minimum in length and 36 inches (915 mm) minimum in width.

2.4. The clear width of an exterior accessible route located within seating areas shall be permitted to be 36 inches (915 mm) minimum.

2.5. The clear width of an exterior ramp shall comply with Section 405.5.

The following would provide an option that would measure above the baseboards without having to go into the extreme measurement details. Yes, you can do super fancy baseboards that are higher or thicker than standard, but that is exceptionally rare. If this is needed, the dimensions included in the proposal could be included (or not). When rolling down the hall you pass a lot of doors, but there the door trim can be excluded if the existing exceptions are restored. In 11-14, for clearances at kitchens the committee approved “measured at the narrowest point, excluding hardware and appliance controls”. We could say something as simple as that for baseboards and door trim.

Further modify the proposal as follows:

SECTION 403
WALKING SURFACES

403.5.1 General. The clear width of an interior accessible route shall be 36 inches (915 mm) minimum. The clear width of an exterior accessible route shall be 48 inches (1220 mm) minimum. Where confined be walls, the clear width of the accessible route shall be measured to adjacent walls.
above baseboards that are 7 inches or less in height.

Exceptions:

2. Each side of the clear width of an accessible route shall be permitted to be reduced in accordance with the following dimensions:
   a. A reduction of 1 1/2 inches (38 mm) to a height of 1-inch (25 mm) maximum above the floor;
   b. A reduction of 1-inch (25 mm) to a height of 7 inches (180 mm) maximum above the floor; and
   c. A reduction of 2 inches (50 mm) above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by a clear floor space complying with Section 305.3.

2.1. The clear width of an exterior accessible route located within seating areas shall be permitted to be 36 inches (915 mm) minimum.

3.2. The clear width of an exterior ramp shall be permitted to comply with Section 405.5.

SECTION 404
DOORS, DOORWAYS AND GATES

404.2.3 Maneuvering clearances. Minimum maneuvering clearances at doors and gates shall comply with Section 404.2.3. Maneuvering clearances shall include the full clear opening width of the doorway and the required latch-side or hinge-side clearance. Such maneuvering clearances shall be measured to walls and exclusive of baseboard that are 7 inches or less in height and door trim that is 4-1/2” or less in width.

Exception: Baseboards and other trim elements shall be permitted to project into the maneuvering clearance 1 ½ inches (38 mm) maximum to a height of 1-inch maximum above the floor and 1-inch (25 mm) maximum above a height of 1-inch (25mm) to a height of 7 inches (180 mm) maximum above the floor.

Reason: This is in response to the committee's comments during discussion. While I totally agree with the intent of 04-03 and 04-06, Exception 1 in Section 403.5.1 is way too complicated for measuring baseboards and toe kicks. The change to 404.2.3 addresses baseboards, but not the trim around the door for door maneuvering clearances – we need to allow for both. In addition - the proposed language as currently approved also conflicts with the current option for columns, doorways or pilasters for reductions on one side instead of both sides (403.5.1 Exception 2 and 3). This first comment puts back the option for items moving into the route on one side and for items such as columns, doorways or other items taller than 7 inches. Also, as you roll down the hall, you go past a lot of doorways with trim on both sides.

BALLOT COMMENT 5 - FIRST DRAFT:
Proponent: Ken Schoonover, Individual Member
Desired Action: Affirmative with comment
Modification:
Further modify as follows:
Exception 1. Each side of the clear width ... the following dimensions:
   a. A reduction of 1 1/2 inches (38 mm) maximum to a height of 1-inch (25 mm) maximum above the floor;
   b. A reduction of 1-inch (25 mm) maximum to a height of 7 inches (180 mm) maximum above the floor; and
   c. A reduction of 2 inches (50 mm) maximum above 7 inches (180 mm) in height for a length of 24 inches (610 mm) maximum, provided the reduced-width segments are separated by a clear floor space complying with Section 305.3.

Reason: The language literally limits the reductions in Exception 1 to only those absolute dimensions. Further modify the proposal to make the reduction dimensions maximums, as follows:

Committee decision: AS/AM/D | Committee Vote at Meeting: | Committee Vote on Ballot:
REPORT OF HEARING – FIRST DRAFT
Modification (if any):
Committee Reason:

BALLOT COMMENT- SECOND DRAFT:
Proponent:
Desired Action:
Modification:

Committee decision: AS/AM/D | Committee Vote at Meeting: | Committee Vote on Ballot:
FINAL ACTION:
Modification (if any):
Committee Reason:

**REASON:** Currently, it is not clear what “user passage” means. Some officials and accessibility consultants treat any door that a wheelchair user can move into a door for user passage, even if the closet is a shallow storage closet. Adding the word “through” will make it clear that only doors that a person is expected to pass through entirely are subject to these requirements.

Committee Action: Disapproval 26-0-1

**REPORT OF HEARING:**

Modification (if any):

Committee Reason: The proposal does not accomplish what the proponent intended.
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04-08 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-08 – 2021

404.2.3.1

**Proponent:** M. Bradley Gaskins, AIA CASp, The McIntosh Group, LLC

**Revise as follows:**

SECTION 404

DOORS, DOORWAYS AND GATES

404.2.3 **Maneuvering clearances.** Minimum maneuvering clearances at doors and gates shall comply with Section 404.2.3. Maneuvering clearances shall include the full clear opening width of the doorway and the required latch-side or hinge-side clearance. **The maneuvering clearance shall be located a maximum of 8 inches (205 mm) from the face of the door and shall be clear of adjacent walls or obstructions. The maneuvering space but shall extend vertically from the floor surface to a height 80 inches (2030 mm).**

**REASON:** This shall provide clarification that the required door maneuvering clearance cannot be more than 8 inches from the face of the door, as implied in Section 404.2.3.5 Recessed Doors and Gates.

**Staff note:** If this proposal is accepted, the committee will need to provide direction on changes to Figures 404.2.3.2(A) through 404.2.3.2(H).

Committee Action: Disapproval 21-4-2

**REPORT OF HEARING:**

**Modification (if any):** two modifications were proposed, but the final vote for As Modified was unsuccessful

**Committee Reason:** The new first sentence is redundant with Section 404.2.3.5 *Recessed doors and gates.* The vertical requirement for the clear floor space is an issue for items adjacent to the...
door, such as light switches, fire alarm pulls, door framing, baseboards, wall sconces, signage—none of which are obstructions to operation of the door.

### 04-08 – 2021 Ballot Comments

**BALLOT COMMENT 1- FIRST DRAFT:**
- **Proponent:** Doug Anderson, AHLA
- **Desired Action:** Affirmative with comment
- **Modification:**
  - **Reason:** This requirement is often confused and clarification would be a positive step.

---

Committee Action for First Ballot:

**REPORT OF HEARING:**

**Modification (if any):** 
**Committee Reason:**

**Report for 04-08 – 2021**

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**BALLOT COMMENT 1- FIRST DRAFT:**
- **Proponent:** Doug Anderson, AHLA
- **Desired Action:** Affirmative with comment
- **Modification:**
  - **Reason:** This requirement is often confused and clarification would be a positive step.

---

**FINAL ACTION:**

**Committee Reason:**

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Committee Vote at Meeting: **Committee Vote on Ballot:**
04-11 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-11 – 2021

404.2.6.1

**Proponent:** Kimberly Paarlberg, International Code Council

**Revise as follows:**

**SECTION 404**
**DOORS, DOORWAYS AND GATES**

**404.1 General.** Doors, doorways and gates that are part of an accessible route shall comply with Section 404.

**Exception:** Doors, doorways and gates designed to be operated only by security personnel shall not be required to comply with Sections 404.2.3, 404.2.6, 404.2.7, 404.2.8, 404.3.1, 404.3.2, 404.3.4, 404.3.7 and 404.3.8.

**404.2 Manual doors, doorways and manual gates…..**

**404.2.6 Door and gate hardware.** Handles, pulls, latches, locks and other operable parts on doors and gates shall have a shape that is easy to grasp with one hand and does not require tight grasping, pinching or twisting of the wrist to operate. The operational force to retract latches or disengage devices that hold the door or gate in a closed position shall be as follows:

1. Hardware operation by a forward, pushing or pulling motion: 15 pounds (66.7 N) maximum.
2. Hardware operation by a rotational motion: 28 inch-pounds (315 N·cm) maximum.
404.2.6.1 **Hardware height.** Operable parts of such hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the floor. Where sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.

**Exceptions:**
1. Locks used only for security purposes and not used for normal operation are permitted at any height.
2. Where the International Swimming Pool and Spa Code requires restricting access to a pool, spa, or hot tub, and where door and gate latch release mechanisms are accessed from the outside of the barrier and are not of the self-locking type, such as mechanism shall be located above the finished floor or ground surface, not less than 52 inches (1219 mm) and not greater than 54 inches (1370 mm), provided that the latch release mechanism is not a self-locking type such as where the lock is operated by means of a key, electronic opener, or the entry of a combination into an integral combination lock.

404.3 **Automatic and power-assisted doors and gates.** …

404.3.8 **Door and gate hardware.** Handles, pulls, latches, locks and other operable parts shall comply with Section 404.2.6.

---

**REASON:** This is a two-purpose proposal.

The intent of this proposal to exception 1 is to allow for doors to be locked up at night by business owners and to have options for security locking systems. Section 404.1 was revised last cycle to consolidate the exceptions for locks used for security purposes. By changing this to ‘security personnel’ I am hearing the interpretation that a bank can be locked down by the guard, but not by any of the staff, because they are not ‘security personnel’. This is an issue for a lot of different types of spaces. While I don’t want to forgive all items like we do in 404.1, I want to at least allow security locks on the doors to be outside of the reach since this is not ‘normal use’. This allowance should be allow for manual and automatic doors.

The intent of this proposal to exception 2 is to allow for gates on swimming pools to meet both accessibility and safety concerns associated with swimming pools being accessed by small children without supervision.

This is consistent with 2024 IBC Section 1010.2.3. A similar allowance is also provided for in the 2010 ADA.

---

**04-11 – 2021 Modification**
Proposed Modification

**Proponent:** Marsha Mazz, United Spinal Assoc.
404.2.6.1 Hardware height. Operable parts of such hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the floor. Where sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.

Exceptions:

1. Locks used only for security purposes to secure the premises when not normally occupied and not used for normal operation are permitted at any height.

2. Where the International Swimming Pool and Spa Code requires restricting access to a pool, spa, or hot tub, and where door and gate latch release mechanisms are accessed from the outside of the barrier and are not of the self-locking type, such as mechanism shall be located above the finished floor or ground surface, not less than 52 inches (1219 mm) and not greater than 54 inches (1370 mm), provided that the latch release mechanism is not a self-locking type such as where the lock is operated by means of a key, electronic opener, or the entry of a combination into an integral combination lock.

Reason: Exception 1 was removed from this section during the last cycle. My recollection is that it was removed because, arguably, all locks are for security purposes rendering the provision applicable to every lock on every door. The original intent of this exception was to allow for the type of lock that is at floor level or in the top of the door frame and typically only operated twice daily when the premises are closed or opened for business. The revised wording makes this clear and would not be mistakenly applied to a lock that must be operated to gain access to a portion of a building or facility that is occupied e.g., a door to a secured area not operated by security personnel (see Exception to Section 404.1).

Committee Action: Split question – Exp. 1 AM 24-2-2; Exp. 2 AM 13-7-5

REPORT OF HEARING:

Modification (if any):

Further modify as follows:

404.2.6.1 Hardware height. Operable parts of such hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the floor. Where sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.

Exceptions:

1. Locks used only for security purposes to secure the premises when not normally occupied and not used for normal operation are permitted at any height.

2. Where the International Swimming Pool and Spa Code administrative authority requires restricting access to a pool, spa, or hot tub, and where door and gate latch release mechanisms are accessed from the outside of the barrier and are not of the self-locking type, such as mechanism shall be located above the finished floor or ground surface, not less than 52 inches (1219 mm) and not greater than 54 inches (1370 mm), provided that the latch release mechanism is not a self-locking type such as where the lock is operated by means of a key, electronic opener, or the entry of a combination into an integral combination lock.
Committee Reason: Exception 1 was approved to allow for businesses to secure the front door after operating hours. Any needed employee modifications will be done on a case by case basis. The modification clarifies the original intent of this exception.

Exception 2 was approved to coordinate with the 2010 ADA, ISPSC and IBC for allowance for swimming pool barrier. The intent is to balance accessibility and safety for children. The modification to change the reference from SPSC to ‘administrative authority’ was to have a more generic reference that was consistent with the A117.1 scope references and in case someone had not adopted the ISPSC. The 2nd modification to remove the end of Exp. 2 was to remove redundant language.

04-11 – 2021 Ballot Comments

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<td>Proponent: Dan Buuck, NAHB</td>
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<td>Desired Action: Affirmative with comment</td>
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<td>Modification:</td>
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<td>Reason: Further work is necessary to ensure that this language does not conflict with the Latch Release section in the International Swimming Pool and Spa Code.</td>
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04-11 – 2021 Public Comment 1
404.2.6.1

Proponent: Dan Buuck, National Association of Home Builders (NAHB)

Further revise as follows:

SECTION 404
DOORS, DOORWAYS AND GATES

404.2.6.1 Hardware height. Operable parts of such hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the floor. Where sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.

Exceptions:
1. Locks used only to secure the premises when not normally occupied and not used for normal operation are permitted at any height.
2. Where the administrative authority requires restricting access to a pool, spa, or hot tub, and where door and gate latch release mechanisms are accessed from the outside of the barrier and are not of the self-locking type, such mechanism shall be located above the finished floor or ground surface, not less than 52 inches (1320 mm) and not greater than 54 inches (1370 mm) for public pools, spas, and hot tubs and not less than 54 inches (1370 mm) for residential pools, spas, and hot tubs.
3. Where the administrative authority requires restricting access to a pool, spa, or hot tub, and where door and gate latch release mechanisms are of the self-locking type such as where the lock is operated by means of a key, an electronic opener or the entry of a combination into an integral combination lock, the lock operation control and the latch release mechanism shall be located above the finished floor or ground surface, not less than 34 inches (865 mm) and not greater than 48 inches (1220 mm) for public pools, spas, and hot tubs and not less than 54 inches (1370 mm) for residential pools, spas, and hot tubs.

4. Where the administrative authority requires restricting access to a pool, spa, or hot tub at private pools, and where the only latch release mechanism of a self-latching device for a gate is located on the pool and spa side of the barrier, the release mechanism shall be located at a point that is at least 3 inches (76 mm) below the top of the gate.

---

**REASON:** The language the committee approved only brought in one of three locking arrangements listed in Section 305.3.3 of the International Swimming Pool and Spa Code (ISPSC). This change brings in the other two which will correlate the two documents. This is important, because it will keep hardware installers, building owners, and managers from being cited for non-compliance with A117 due to complying with the life safety requirements of the ISPSC.

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**Committee Action for Public Comment 1:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

04-11 Buuck.doc

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**Committee Action for First Ballot:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:
Further modify as follows: 

**404.2.6.1 Hardware height.** Operable parts of such hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the floor. Where sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides.

**Exceptions:**

1. Locks used only for security purposes to secure the premises when not normally occupied and not used for normal operation are permitted at any height.

2. Where the International Swimming Pool and Spa Code administrative authority requires restricting access to a pool, spa, or hot tub, and where door and gate latch release mechanisms are accessed from the outside of the barrier and are not of the self-locking type, such as mechanism shall be located above the finished floor or ground surface, not less than 52 inches (1219 mm) and not greater than 54 inches (1370 mm), provided that the latch release mechanism is not a self-locking type such as where the lock is operated by means of a key, electronic opener, or the entry of a combination into an integral combination lock.

**Committee Reason:** Exception 1 was approved to allow for businesses to secure the front door after operating hours. Any needed employee modifications will be done on a case by case basis. The modification clarifies the original intent of this exception. Exception 2 was approved to coordinate with the 2010 ADA, ISPSC and IBC for allowance for swimming pool barrier. The intent is to balance accessibility and safety for children. The modification to change the reference from SPSC to ‘administrative authority’ was to have a more generic reference that was consistent with the A117.1 scope references and in case someone had not adopted the ISPSC. The 2nd modification to remove the end of Exp. 2 was to remove redundant language.
04-12 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-12 – 2021
404.2.8

Proponent: Kimberly Paarlberg, International Code Council

Revise as follows:

SECTION 404
DOORS, DOORWAYS AND GATES

404.2.8 Door and gate opening force. Fire doors and doors or gates required to be equipped with panic hardware, break away features or other factors requiring higher opening force for safety reasons shall have the minimum opening force allowable in scoping provisions adopted by the appropriate administrative authority. For other doors or gates, the force for pushing or pulling open doors or gates shall be as follows:

1. Interior hinged door: 5.0 pounds (22.2 N) maximum.
2. Interior Sliding or folding door: 5.0 pounds (22.2 N) maximum the door shall require not more than a 30-pound (133 N) force to be set in motion and shall move to a full open position when subjected to not more than a 15-pound (67 N) force.

Exception: The force required to retract latch bolts or disengage other devices that hold the door or gate in a closed position shall not apply to panic hardware, delayed egress devices or fire-rated hardware.

**REASON:** This proposal addresses two issues – if the force on sliding and folding doors applies to exterior doors, and the force needed on sliding and folding interior doors. The current text could be read to apply to exterior and interior sliding or folding doors for opening force. Historically, the standard does not have a force for exterior doors due exterior forces such as wind or differences in pressure due to weather changes. A sliding or folding door that is moving
on a track cannot meet the same force requirements as a swinging door. The proposed text is consistent with IBC Section 1010.1.3.

Committee Action: Disapproval 23-1-1

REPORT OF HEARING:
Modification (if any):

Committee Reason: More data is needed on the operating forces of sliding and folding doors from the industry before adding these forces to the standard. There needs to be clarification on what types of doors this is intended to address (e.g. closet doors or glass sliding doors). The force may be excessive for some door types. The committee agreed that Item 2 is intended for interior doors.

04-12 – 2021 Ballot Comments

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<td>Modification:</td>
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<tr>
<td>Reason: The idea is solid for consistency with Chapter 10 of IBC but seems that it should be applied to fire doors and not interior sliding or folding doors.</td>
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04-12 – 2021 Ballot Comment 2

102.1

Proponent: Kimberly Paarlberg, ICC

Further revise as follows:

**404.2.8 Door and gate opening force.** Fire doors and doors or gates required to be equipped with panic hardware, break away features or other factors requiring higher opening force for safety reasons shall have the minimum opening force allowable in scoping provisions adopted by the appropriate administrative authority. For other doors or gates, the force for pushing or pulling open doors or gates shall be as follows:

1. Interior hinged door: 5.0 pounds (22.2 N) maximum.
2. *Interior* Sliding or folding door: 5.0 pounds (22.2 N) maximum

**REASON:** The committee agreed that Item 2 was for only interior doors.

**Committee Action for Ballot Comment 2:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

---

**Committee Action for First Ballot:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

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**Report for 04-12- 2021**

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<td>More data is needed on the operating forces of sliding and folding doors from the industry before adding these forces to the standard. There needs to be clarification on what types of doors this is intended to address (e.g. closet doors or glass sliding doors). The force may be excessive for some door types. The committee agreed that Item 2 is intended for interior doors.</td>
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**BALLOT COMMENT 1 - FIRST DRAFT:**

**Proponent:** Matt Lescher representing NATO

**Desired Action:** Affirmative with comment

**Modification:**

**Reason:** The idea is solid for consistency with Chapter 10 of IBC but seems that it should be applied to fire doors and not interior sliding or folding doors.

**BALLOT COMMENT 2 - FIRST DRAFT:**

**Proponent:** Kim Paarlberg representing ICC

**Desired Action:** Negative with comment

**Modification:**

**404.2.8 Door and gate opening force.** Fire doors and doors or gates required to be equipped with panic hardware, break away features or other factors requiring higher opening force for safety reasons shall have the minimum opening force allowable in scoping provisions adopted by the appropriate administrative authority. For other doors or gates, the force for pushing or pulling open doors or gates shall be as follows:

1. *Interior* hinged door: 5.0 pounds (22.2 N) maximum.
2. *Interior* Sliding or folding door: 5.0 pounds (22.2 N) maximum

**Reason:** The committee agreed that Item 2 was for only interior doors.

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04-15 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-15 – 2021

404.3.8(New)

**Proponent:** Joseph R. Hetzel, P.E., Joseph R Hetzel Consulting LLC, representing American Association of Automatic Door Manufacturers (AAADM)

Revise as follows:

**SECTION 404**

**DOORS, DOORWAYS AND GATES**

**404.3 Automatic and power-assisted doors and gates.** …

**404.3.8 Automatic door and gate-opening force.** The force required for pushing or pulling open power-assisted doors shall comply with ANSI/BHMA A156.19.

---

**REASON:** Automatic doors are regulated by ANSI/BHMA standards that dictate maximum allowable forces for manually pushing or pulling open doors when in a power-assist mode, thus language is needed in the A117.1 standard to clarify the origin of these provisions. Where the scoping provisions adopted by authorities having jurisdiction allow for or require an automatic door to be installed, the applicable ANSI/BHMA standard referenced in the International Building Code should apply.

Committee Action: As Modified 13-7-3

**REPORT OF HEARING:**

**Modification (if any):** Motion to add “swinging” passed 25-1-0

Further revise as follows:

**404.3.8 Automatic door and gate-opening force.** The force required for pushing or pulling open power-assisted swinging doors shall comply with ANSI/BHMA A156.19.
Staff note: Editorially added reference to Section 106.2.7 for ANSI/BHMA A156.19

Committee Reason: The modification add ‘swinging’ was to clarify that this is how power-assisted doors operate. The title was modified editorially to match the proposed code text. While the BMHA standard is referenced in Section 404.3, the new section was added so that it was clear what forces would be required on power-assisted swinging doors of opening the door. This is different from the 5 lbs. force in the A117.1. Since this is a section on doors and gates, there was concern about this only applying to doors. There are questions about the application of the existing Section 404.3.8, Door and gate hardware; and how that would be applied since this proposal does not delete that section.

04-15 – 2021 Ballot Comments

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<td><strong>Modification:</strong></td>
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<tr>
<td><strong>Reason:</strong> Request Disapproval. The title of this new section is misleading. It should be “Power-assisted door opening force”. This section does not include criteria for fully automatic or low-energy automatic doors. Also, “and gates” should have been added in the text for consistency throughout this section. The proposed modification is also unnecessary since 404.3 already states that power-assist doors shall comply with BHMA A156.19 and the proposed modification has no overriding effect on this general reference.</td>
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Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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<td>Requirement (if any):</td>
<td>404.3.8 Automatic door and gate opening force. The force required for pushing or pulling open power-assisted swinging doors shall comply with ANSI/BHMA A156.19 listed in Section 106.2.6</td>
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Committee Reason:
The modification add 'swinging' was to clarify that this is how power-assisted doors operate. The title was modified editorially to match the proposed code text.
While the BHMA standard is referenced in Section 404.3, the new section was added so that it was clear what forces would be required on power-assisted swinging doors of opening the door. This is different from the 5 lbs. force in the A117.1.
Since this is a section on doors and gates, there was concern about this only applying to doors. There are questions about the application of the existing Section 404.3.8, Door and gate hardware; and how that would be applied since this proposal does not delete that section.

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Kim Paarlberg representing ICC
Desired Action: Negative with comment
Modification:
Reason: Request disapproval. The title of this new section is misleading. It should be “Power-assisted door opening force”. This section does not include criteria for fully automatic or low-energy automatic doors. Also, “and gates” should have been added in the text for consistency throughout this section.
The proposed modification is also unnecessary since 404.3 already states that power-assisted doors shall comply with BHMA A156.19 and the proposed modification has no overriding effect on this general reference.

Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:

REPORT OF HEARING – FIRST DRAFT
Modification (if any):
Committee Reason:

BALLOT COMMENT- SECOND DRAFT:
Proponent:
Desired Action:
Modification:
Reason:
Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:

FINAL ACTION:
Modification (if any):
Committee Reason:
04-16 – 2021 overview

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BC1 Buuck, NAHB  Affirmative

BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-16– 2021

404.3.8(New)

**Proponent:** Joseph R. Hetzel, P.E., Joseph R Hetzel Consulting LLC, representing American Association of Automatic Door Manufacturers (AAADM)

Revise as follows:

SECTION 404

DOORS, DOORWAYS AND GATES

404.3 Automatic and power-assisted doors and gates. …

404.3.8 Automatic door and gate-opening force in manual operation. The force required for pushing or pulling open full power automatic doors under manual operation shall comply with ANSI/BHMA A156.10. The force required for pushing or pulling low-energy automatic operated doors under manual operation shall comply with ANSI/BHMA A156.19.

**REASON:** Automatic doors are regulated by ANSI/BHMA standards that dictate maximum allowable forces for pushing or pulling open full power and low-energy automatic doors when in a manual mode, thus language is needed in the A117.1 standard to clarify the origin of these provisions. Where the scoping provisions adopted by authorities having jurisdiction allow for or require an automatic door to be installed, the applicable ANSI/BHMA standard referenced in the International Building Code should apply.

Committee Action: Disapproval  20-5-1

REPORT OF HEARING:

Modification (if any):
Committee Reason: The BMHA standards are already addressed in Section 404.3. This section deals with doors and gates, but the text only covers doors. There was a question about when a power door be pushed? There are questions about the application of the existing Section 404.3.8, Door and gate hardware; and how that would be applied since this proposal does not delete that section.

04-16 – 2021 Ballot Comments

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<td><strong>Reason:</strong> If compliance with the BHMA standard is part of the listing for automatic doors, this requirement is unnecessary. Requiring such doors to be listed to the BHMA standard would greatly simplify compliance and enforcement. It is unclear how to enforce compliance as accepted by the committee.</td>
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Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee vote on Ballot:

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04-18 – 2021 overview

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**BC1** Paarlberg, ICC  Affirmative  Editorial

BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-18 – 2021
404.3.10(New)

**Proponent:** Kimberly Paarlberg, International Code Council

Add new text as follows:

**SECTION 404**
DOORS, DOORWAYS AND GATES

404.3 Automatic and power-assisted doors and gates. …

404.3.10 Door and gate surfaces. On power-assisted swinging doors and gates, surfaces within 10 inches (255 mm) of the finish floor or ground, measured vertically, shall comply with Section 404.2.9.

(Note: No changes to Section 404.2.9. Shown only for reference.)

404.2.9 Door and gate surface. Door and gate surfaces within 10 inches (255 mm) of the floor, measured vertically, shall be smooth surfaces on the push side extending the full width of the door or gate. Door and gate hardware or any other obstruction or protrusion shall not be mounted in nor extend into the area within 10 inches (255 mm) of the floor. Parts creating horizontal or vertical joints in such surfaces shall be within 1/16 inch (1.6 mm) of the same plane as the other. Cavities created by added kick plates shall be capped.

**Exceptions:**

1. Sliding doors shall not be required to comply with this section.
2. Tempered glass doors without stiles and having a bottom rail or shoe with the top leading edge tapered at no less than 60 degrees from the horizontal shall not be required to comply with the 10-inch (255 mm) bottom rail height requirement.
3. Doors and gates that do not extend to within 10 inches (255 mm) of the floor shall not be required to comply with this section.
4. The installation of kick plates on existing doors and gates without a smooth surface within 10 inches (255 mm) of the floor shall be permitted. The kick plates shall extend to 10 inches (255 mm) above the floor and no more than 1 inch (25 mm) from the sides and bottom of the door. Cavities created by such kickplates shall be capped.

**REASON:** As currently written – due to Section 404.2 scoping – Section 404.2.9 and the smooth door surface requirements are only applicable to “manual doors and gates.” This exclusion of automatic and power-assisted doors is not coordinated with ADA Section 404.2.10 which would apply similar requirements to any door, manual, automatic or power-assisted.

At a minimum, Section 404.3 needs to be modified so that power-assisted doors must meet this requirement. Unlike an automatic door, a power-assisted door does require the user to initiate a force on the door to begin its operation. Because of this need to push up against the door to start the door opening motion, a smooth solid surface is needed.

I have included two options. The first to address only the power-assisted doors since that is the most critical need, and the second to address both automatic (full power or low-energy) and power-assisted doors. The second option would coordinate with the ADA while the first option is only a partial step towards coordination but a definite improvement in access for the A117.1.

Another issue which is not addressed by this proposal but would be something for the committee to consider is how to handle automatic doors when the power goes out. This would be important for both swinging and sliding doors since they would rely on the break-away feature and become a swinging door. Since the committee did require maneuvering clearances (Exception 1 in 404.3.4) if standby or back-up power is not required, then it may also be reasonable to consider the door surface requirements if such power is not provided and the doors must then be used manually.

Committee Action: As Submitted 23-0-0

**REPORT OF HEARING:**

Modification (if any):

Committee Reason: A user may need to push on the face of a door with power-assist operation to move through the door, therefore, a bottom plate on the push side is an appropriate requirement.

---

**04-18 – 2021 Ballot Comments**

**BALLOT COMMENT 1 - FIRST DRAFT:**

*Proponent: Kim Paarlberg representing ICC*

*Desired Action: Affirmative with comment*

*Modification: See Ballot Comment 1*

---

**04-18 – 2021 Ballot Comment 1**

404.3.10
Proponent: Kimberly Paarlberg, ICC

Further revise as follows:

404.3.10 **Power-assist Door and gate surfaces.** On power-assisted swinging doors and gates, surfaces within 10 inches (255 mm) of the finish floor or ground, measured vertically, shall comply with Section 404.2.9.

---

**REASON:** The title of this new section is misleading. It should be “Power-assisted door and gate surfaces”. This section does not include criteria for fully automatic or low-energy automatic doors.

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Committee Action for Ballot Comment 1:

**REPORT OF HEARING:**

**Modification (if any):**

Committee Reason:

04-18 Paarlberg.doc

Committee Action for First Ballot:

**REPORT OF HEARING:**

**Modification (if any):**

Committee Reason:

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**BALLOT COMMENT - FIRST DRAFT:**

| Proponent: Kim Paarlberg representing ICC |
| Desired Action: Affirmative with comment |

**Modification:**

404.3.10 **Power-assist Door and gate surfaces.** On power-assisted swinging doors and gates, surfaces within 10 inches (255 mm) of the finish floor or ground, measured vertically, shall comply with Section 404.2.9.

**Reason:** The title of this new section is misleading. It should be “Power-assisted door and gate surfaces”. This section does not include criteria for fully automatic or low-energy automatic doors.

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-19 – 2021

404.5.1

**Proponent:** Kimberly Paarlberg, International Code Council

**Revise text as follows:**

**SECTION 405**

RAMPS

405.1 **General.** Ramps along accessible routes shall comply with Section 405.

**EXCEPTIONS:**

1. In assembly areas, aisle ramps adjacent to seating and not serving elements required to be on an accessible route shall not be required to comply with Section 405.

2. Exterior sidewalks that connect elements on a site and that are a minimum of 48 inches wide and slope with grade are not required to comply with Section 405.

**REASON:** In hilly sites, sidewalks that move up with the grade may be sloped enough to be considered a ramp. However, to put curb protection and handrails on these sidewalks will block access to street parking and adjacent building entrances. This exception is consistent with Public Right-of-way where dealing with sloped streets.

Committee Action: Disapproval 23-1-0

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:** This allowance is too broad. While it is permitted in PROWAG, an open site should be able to design for the standard accessible route without this exception for slope of grade.
### 04-19 – 2021 Ballot Comments

#### BALLOT COMMENT 1- FIRST DRAFT:

**Proponent:** Matt Lescher representing NATO  
**Desired Action:** Negative with comment

**Modification:**

**Reason:** This code change is needed for large office campuses, college campuses, and residential developments which have streets but are not located in the PROW. The grade should be tied to the grade of the street.

---

Committee Action for First Ballot:

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:**

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**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:** This allowance is too broad. While it is permitted in PROWAG, an open site should be able to design for the standard accessible route without this exception for slope of grade.

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#### BALLOT COMMENT 1- FIRST DRAFT:

**Proponent:** Matt Lescher representing NATO  
**Desired Action:** Negative with comment

**Modification:**

**Reason:** This code change is needed for large office campuses, college campuses, and residential developments which have streets but are not located in the PROW. The grade should be tied to the grade of the street.

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**REPORT OF HEARING – FIRST DRAFT**

**Modification (if any):**

**Committee Reason:**

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#### BALLOT COMMENT- SECOND DRAFT:

**Proponent:**

**Desired Action:**

**Modification:**

**Reason:**

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**FINAL ACTION:**

**Modification (if any):**

**Committee Reason:**
04-21 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-21 – 2021

405.7.5

Proponent: Ashley Pitts, Jensen Hughes, Inc.

Revise as follows:

SECTION 405
RAMPS

405.7.5 Doorways. Where a door or gate is adjacent to a ramp landing, maneuvering clearances required by Sections 404.2.3 and 404.3.4 shall be permitted to overlap the landing area. Doors, gates, and the swing of the door or gate shall not overlap the required minimum area of the ramp landing. Where a door or gate that is subject to locking is located adjacent to a ramp landing, the landing shall be sized to provide a turning space complying with Section 304.3.

**REASON:** The commentary to this section states: “The maneuvering clearance can overlap the ramp landing, just not the door or the door swing.” This intent is not apparent in the code language. If the intent is to prohibit a door swing from overlapping the minimum required ramp landing, then this should be stated in the code language.

Committee Action: Disapproval 16-5-1

REPORT OF HEARING:
Modification (if any):

Committee Reason: While this proposal is appropriate for minimum size ramps and landings, there were a couple of concerns raised that need additional clarification. The committee agrees
with the figures in the A117.1 commentary for Section 405.7.5 that illustrated the concerns for persons moving up a ramp to a landing with a door. However, if a ramp is very large, such as in a sports stadium, the doors swinging over the required ramp landing would most likely not be a conflict. If a ramp is for means of egress only, the door could swing over a ramp landing in the direction of travel.

04-21 – 2021 Ballot Comments

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<td><strong>Modification:</strong> Reason: The additional requirement would increase accessibility and the concerns raised were not compelling nor always clear. Based on recommendations and commentary from ICC and Accessible, believe it is in the best interest of people with disabilities to explicitly prohibit the door swinging into the area at the top or bottom of a ramp.</td>
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04-21 – 2021 Ballot Comment 1
405.7.5

**Proponent:** Scott Windley, US Access Board

Replace with the following:

**405.7.5 Doorways.** Where a door or gate is adjacent to a ramp landing, maneuvering clearances required by Sections 404.2.3 and 404.3.4 shall be permitted to overlap the landing area. **Doors or gates shall not swing into the minimum landing width and depth required by sections 405.7.2 and 405.7.3.** Where a door or gate that is subject to locking is located adjacent to a ramp landing, the landing shall be sized to provide a turning space complying with Section 304.3.

**Exception:** Doors or gates that provide only exit discharge shall be permitted to overlap the minimum landing width and depth required by sections 405.7.2 and 405.7.3.
REASON:
Potential Solutions:

Perspective example:

Committee Action for Ballot Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-21 Windley.doc
04-21 – 2021 Ballot Comment 3
405.7.5

Proponent: Kimberly Paarlberg, ICC

Further revise the proposal:

405.7.5 Doorways. Where a door or gate is adjacent to a ramp landing, maneuvering clearances required by Sections 404.2.3 and 404.3.4 shall be permitted to overlap the landing area. Doors, gates, and the swing of the door or gate shall not overlap the required minimum area of obstruct the accessible route onto the ramp landing. Where a door or gate that is subject to locking is located adjacent to a ramp landing, the landing shall be sized to provide a turning space complying with Section 304.3.

REASON: The doors opening and stopping a person using a wheelchair on a sloped portion of the ramp is a concern that needs to be addressed.

Committee Action for Ballot Comment 3:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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Committee Reason: While this proposal is appropriate for minimum size ramps and landings, there were a couple of concerns raised that need additional clarification. The committee agrees with the figures in the A117.1 commentary for Section 405.7.5 that illustrated the concerns for persons moving up a ramp to a landing with a door. However, if a ramp is very large, such as in a sports stadium, the doors swinging over the required ramp landing would most likely not be a conflict. If a ramp is for means of egress only, the door could swing over a ramp landing in the direction of travel.
405.7.5 Doorways. Where a door or gate is adjacent to a ramp landing, maneuvering clearances required by Sections 404.2.3 and 404.3.4 shall be permitted to overlap the landing area. Doors or gates shall not swing into the minimum landing width and depth required by sections 405.7.2 and 405.7.3. Where a door or gate that is subject to locking is located adjacent to a ramp landing, the landing shall be sized to provide a turning space complying with Section 304.3.

**Exception:** Doors or gates that provide only exit discharge shall be permitted to overlap the minimum landing width and depth required by sections 405.7.2 and 405.7.3.

**Reason:** Potential Solutions:

---

**BALLOT COMMENT 1- FIRST DRAFT:**
Proponent: Scott Windley
Desired Action: Negative with Comment

**Modification:**
Replace with the following:

**405.7.5 Doorways.** Where a door or gate is adjacent to a ramp landing, maneuvering clearances required by Sections 404.2.3 and 404.3.4 shall be permitted to overlap the landing area. Doors or gates shall not swing into the minimum landing width and depth required by sections 405.7.2 and 405.7.3. Where a door or gate that is subject to locking is located adjacent to a ramp landing, the landing shall be sized to provide a turning space complying with Section 304.3.

**Exception:** Doors or gates that provide only exit discharge shall be permitted to overlap the minimum landing width and depth required by sections 405.7.2 and 405.7.3.

---

**BALLOT COMMENT 2- FIRST DRAFT:**
Proponent: Rex Pace representing HUD
Desired Action: Negative with comment

**Reason:** The additional requirement would increase accessibility and the concerns raised were not compelling nor always clear. Based on recommendations and commentary from ICC and Accessible, believe it is in the best interest of people with disabilities to explicitly prohibit the door swinging into the area at the top or bottom of a ramp.

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**BALLOT COMMENT 3- FIRST DRAFT:**
Proponent: Kim Paarlberg representing ICC
**Report for 04-21– 2021**

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**405.7.5 Doorways.** Where a door or gate is adjacent to a ramp landing, maneuvering clearances required by Sections 404.2.3 and 404.3.4 shall be permitted to overlap the landing area. Doors, gates, and the swing of the door or gate shall not overlap the required minimum area of obstruct the accessible route onto the ramp landing. Where a door or gate that is subject to locking is located adjacent to a ramp landing, the landing shall be sized to provide a turning space complying with Section 304.3.

**Reason:** The doors opening and stopping a person using a wheelchair on a sloped portion of the ramp is a concern that needs to be addressed.

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**FINAL ACTION:**

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04-22 – 2021 overview

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**Comment | Proponent | Requested Action | Committee Action | Mtg. Date | Notes; Groups; groupings**
---|---|---|---|---|---
BC1 | Gaskins, NACS | Negative | | | Editorial |

BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

**04-22 – 2021**

**Figures 406.2(A), 406.2(B), 406.3(A), 406.3(B), 406.4, 406.5.2, 406.5.5**

**Proponent:** Billie Louise (Beezy) Bentzen, PhD., Accessible Design for the Blind, representing Association for the Education and Rehabilitation of the Blind and Visually Impaired (AER)

**Revise as follows:**

**SECTION 406**

**CURB RAMPS AND BLENDED TRANSITIONS**

**Figures 406.2(A) through 406.5.5**

*Note: These figures should all show detectable warnings.*
PARALLEL CURB RAMP

FIGURE 406.3(B)
PARALLEL CURB RAMP

FIGURE 406.4
BLENDED TRANSITION
REASON: Curb ramps are not complete without detectable warnings. While there is a section showing detectable warnings on curb ramps in some detail, they should not be omitted here. It implies that they are not required. Wherever curb ramps are depicted, unless they are not required to have detectable warnings, as in Figure 502.9.1, the detectable warning should be included. Figure 502.9.1.2 correctly includes the detectable warning, even though it is in Section 502 Parking Spaces.

Staff Note: Where detectable warnings are required is indicated in Section 406.6.2.
Committee Action: Approved as Modified (Vote:23-5-5)

REPORT OF HEARING:
Modification (if any):

Modification 1 to add note to each drawing “See Section 406.6.2 for where detectable warnings are required.” (Approved 24-5-5)

Modification 2 to remove showing detectable warnings on each drawing. (Approved 23-5-5)

Proposal as approved as modified (23-5-5)

Committee Reason: The first modification was approved because the committee felt that it was important to clarify that detectable warnings were only required in limited situations, thus the addition of the note in each drawing. The 2nd modification was approved to remove the original proposal’s suggestion to show the detectable warning on each curb cut. The committee felt that many people just looked at the pictures rather than the text, so showing the detectable warnings would be misleading. The final proposal was approved because the committee felt the note would address the concern for where detectable warnings would be required and at the same time not seem to require detectable warnings at all locations – especially at locations where detectable warnings would provide misinformation – like at access aisles or into parking lots. PROWAG requires detectable warnings at street crossings.

04-22 – 2021 Ballot Comments

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Brad Gaskins representing NACS
Desired Action: Negative with comment
Modification:
Reason: Proposal is redundant and unnecessary.

Committee Action for First Ballot:

REPORT OF HEARING:
Modification (if any):

Committee Reason:
**Report for 04-22– 2021**

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**REPORT OF HEARING:**
Modification (if any):
Modification 1 to add note to each drawing “See Section 406.6 for where detectable warnings are required.” (Approved 24-5-5)

Modification 2 to remove showing detectable warnings on each drawing. (Approved 23-5-5)

**Committee Reason:** The first modification was approved because the committee felt that it was important to clarify that detectable warnings were only required in limited situations, thus the addition of the note in each drawing. The 2nd modification was approved to remove the original proposal’s suggestion to show the detectable warning on each curb cut. The committee felt that many people just looked at the pictures rather than the text, so showing the detectable warnings would be misleading. The final proposal was approved because the committee felt the note would address the concern for where detectable warnings would be required and at the same time not seem to require detectable warnings at all locations – especially at locations where detectable warnings would provide misinformation – like at access aisles or into parking lots. PROWAG requires detectable warnings at street crossings.

Send to editorial committee.

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**FINAL ACTION:**

Modification (if any):

Committee Reason:
04-24 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-24 – 2021
107.5, 407.2, 407.2.1, 407.2.1.1, 407.2.1.2, 407.2.1.5, 407.2.1.6, 407.2.1.7, 407.2.3(New) through 407.2.3.10.1(New), 407.2.4.4(New), 407.2.4.4.1(New), 497.2.2.4, 407.2.3.1, 407.2.4, 407.4.7.1.1, 407.4.7.1.2, 407.4.7.1.2.1(New), 407.4.7.2, Figure 407.2.1.7

Proponent: Kevin Brinkman, National Elevator Industry, Inc. (NEII)

Revise as follows:

**SECTION 107**
DEFINITIONS

107.5 Defined terms.

**accessibility function button.** A button on an elevator hall call console in a destination-oriented elevator system that, when pressed, will activate a series of visual and verbal prompts and announcements providing instruction regarding hall call console operation and direction to an assigned elevator.

**hall call console.** An elevator call user interface exclusive to a destination-oriented elevator system that requires the user to select a destination floor prior to entering the elevator car.

**SECTION 407**
ELEVATORS

407.1 **General.** Elevators shall comply with Section 407 and ASME A17.1/CSA B44 listed in Section 106.2.8. Elevators shall be passenger elevators as classified by ASME A17.1/CSA B44. Elevator operation shall be automatic.

407.2 **Elevator landing requirements.** Elevator call controls, hall signals and hoistway...
signs landing shall comply with Section 407.2. Where elevator call buttons, keypads, or hall call consoles are provided, they shall also comply with Section 309.4.

407.2.1 Call Controls. Where elevator call buttons or keypads are provided, they shall also comply with Sections 407.2.1 and 309.4. Call buttons, accessibility function button, and additional feature buttons shall be raised or flush. Objects beneath hall call buttons shall protrude 1 inch (25 mm) maximum.

Exceptions:
1. Existing elevators shall be permitted to have recessed call buttons.
2. The restriction on objects beneath call buttons shall not apply to existing call buttons.

407.2.1.1 Height. Call buttons, and keypads, and hall call consoles shall be located within one of the reach ranges specified in Section 308, measured to the centerline of the highest operable part.

Exception: Existing call buttons, and existing keypads and hall call consoles shall be permitted to be located 54 inches (1370 mm) maximum above the floor, measured to the centerline of the highest operable part.

(Note: No change to figure)

FIGURE 407.2.1.1
HEIGHT OF ELEVATOR CALL BUTTONS

407.2.1.2 Size. Call buttons shall be \( \frac{3}{4} \) inch (19 mm) minimum in the smallest dimension.

Exception: Existing elevator call buttons shall not be required to comply with this section.

407.2.1.3 Clear floor space. A clear floor space shall be provided at call controls.

407.2.1.4 Location. The call button that designates the up direction shall be located above the call button that designates the down direction.

Exception: Destination-oriented elevators shall not be required to comply with this section.

407.2.1.5 Signals. Call buttons shall have visible signals to indicate when each call is registered and when each call is answered. Call buttons shall provide an audible signal or mechanical motion of the button to indicate when each call is registered.

Exceptions:
1. Destination-oriented elevators shall not be required to comply with Section 407.2.1.5, provided a visible signal and audible tones and verbal announcements complying with this section are provided.
2. Existing elevators shall not be required to comply with Section 407.2.1.5.

407.2.1.6 Keypads. Where keypads are provided, keypads shall be in a standard telephone keypad arrangement complying with Figure 707.5(A) and shall comply with
Section 407.4.7.2.

407.2.1.7 Destination-oriented elevator signals. Destination-oriented elevators shall be provided with a visible signal and audible tones and verbal announcements to indicate which car is responding to a call. The audible tone and verbal announcement shall be activated by pressing a function button. The function button shall be identified by the International Symbol for Accessibility and a raised indication. The International Symbol for Accessibility, complying with Section 703.6.3.1, shall be \( \frac{5}{8} \) inch \( (16 \text{ mm}) \) in height and be a visual character complying with Section 703.2. The indication shall be three raised dots, spaced \( \frac{1}{4} \) inch \( (6.4 \text{ mm}) \) at base diameter, in the form of an equilateral triangle. The function button shall be located immediately below the keypad arrangement or floor buttons.

(Delete figure)

FIGURE 407.2.1.7

DESTINATION-ORIENTED ELEVATOR INDICATION

407.2.3 Hall Call Consoles. Hall call consoles shall comply with the following requirements:

407.2.3.1 Location. At least one hall call console in the elevator landing area shall be wall mounted. A minimum of one hoistway entrance shall be adjacent to a hall call console. For a multi-car group, the console shall be located between two entrances.

407.2.3.2 Additional hall call consoles. Additional hall call consoles shall be permitted and can be provided outside the elevator landing area and be wall-mounted, pedestal mounted, or mounted on a kiosk or security turnstile.

407.2.3.3 Required features. Hall call consoles shall include a touch screen or keypad complying with 407.2.2 with display screen, an accessibility function button, and audio output loudspeaker. The accessibility function button shall be identified by the International Symbol for Accessibility and a raised indication. The International Symbol for Accessibility, complying with Section 703.6.3.1, shall be a minimum of \( \frac{5}{8} \) inch \( (16 \text{ mm}) \) in height and be a visual character complying with Section 703.2. The indication shall be three raised dots, spaced \( \frac{1}{4} \) inch \( (6.4 \text{ mm}) \) at base diameter, in the form of an equilateral triangle. The accessibility function button shall be located immediately below the keypad arrangement or floor buttons.

407.2.3.4 Touch screen. Touch screen displays shall comply with 407.2.3.5.

407.2.3.5 Display screen. Upon activation, the display screen shall display information such as user input confirmation, elevator assignment designation, direction to the assigned elevator, and when applicable instruction or error messages.

407.2.3.5.1 Contrast. Display screens shall provide contrast with light characters and symbols on a dark background or dark characters and symbols on a light background. The background shall be solid and static.
407.2.3.5.2 Size. Elevator assignment characters shall be 5/8 inch (16 mm) high minimum.

407.2.3.5.3 Duration. Elevator assignment characters shall be displayed for a minimum of 5 seconds upon activation of the accessibility function button.

407.2.3.6 Audio output. Upon activation of the accessibility function button, the audio output shall provide verbal announcements of operating instructions and information such as, user input confirmation, announcement of the elevator assignment designation, direction to the assigned elevator, and, when applicable, error messages. Audio output shall be recorded, digitized human, or synthesized speech and shall be delivered through a loudspeaker. Auditory volume, measured 35 inches (890 mm) in front of the console, shall be maintained at a minimum of 10 dBA above ambient. The volume shall not exceed 80 dBA.

407.2.3.7 Arrangement. Hall call console arrangement of required features shall comply with 407.2.3.7.

407.2.3.7.1 Keypad call console arrangement. Where keypad call consoles are provided, the display screen shall be located directly above the keypad. The accessibility function button shall be located directly below the keypad at a height of not less than 30 inches (760 mm), measured to the centerline of the button, above the finished floor.

407.2.3.7.2 Touch screen call console arrangement. Where touch screen call consoles are provided, the touch screen shall be located directly above the accessibility function button. Any portion of the touch screen requiring user input shall be located at a maximum height of 1220 mm (48 inches), above the finished floor. The accessibility function button shall be located at a height not less than 30 inches (760 mm), measured to the centerline of the button, above the finished floor.

407.2.3.7.3 Proximity of required elements. Required features shall be provided on a hall call console assembly or as individual elements grouped in close proximity.

407.2.3.7.4 Position. For hall call consoles required by Section 407.2.3.1, the face of individual elements or group of individual elements that are operated by user input shall be permitted to slope away from the user, at an angle of no more than 25 degrees from the vertical plane. The face of hall call console shall be permitted to be sloped away from the user, at an angle of no more than 25 degrees from the vertical plane. Additional hall call consoles are permitted to have an angle greater than 25 degrees.
407.2.3.8 Additional features. Hall call console additional features, if provided, shall comply with the following requirements:

407.2.3.8.1 Hall call console additional buttons. Hall call console buttons provided in addition to the accessibility function button shall be permitted.

407.2.3.8.1.1 Arrangement. Buttons shall be arranged and located adjacent to the keypad with a minimum spacing from the keypad to the additional buttons of 1.5 times the spacing used for the standard telephone keypad complying with 407.2.2.

407.2.3.8.1.2 Identification. Buttons shall be identified by raised characters and braille complying with Sections 703.3.1 through 703.3.9 and 703.4.1 through 703.4.4. Identification shall be placed immediately to the left of the control button to which the designation applies.

407.2.3.9 Security or access controls. Security or access control system card readers associated with elevator operation shall be in close proximity to each hall call console in a consistent manner throughout the facility.

407.2.3.10 Elevator car assignment. When the accessibility function button is pressed, the audio output shall provide verbal instruction for the user to enter a destination floor. The selected destination floor shall be confirmed by verbal announcement and on the display screen. Verbal and visible indication of an invalid input shall be provided. The display screen shall indicate the elevator assignment designation and a verbal announcement shall be made of the assigned elevator responding to the call. Visual and verbal direction to the assigned elevator shall be provided.

407.2.3.10.1 Adjacency assignment. When the accessibility function button is pressed, the system shall assign an elevator adjacent to the hall call console unless the adjacent elevator is out of service.

407.2.2407.2.4 Hall signals. Hall signals, including in-car signals, shall comply with Section 407.2.2-407.2.4.

407.2.4 407.2.4.1 Visible and audible signals. A visible and audible signal shall be provided at each hoistway entrance to indicate which car is answering a call and the car’s direction of travel. Where in-car signals are provided they shall be visible from the floor area adjacent to the hall call buttons.

Exceptions:
1. Destination-oriented elevators shall not be required to comply with this section, provided a visible signal and audible tones and verbal announcements complying with Section 407.2.1.7 402.2.4.4 are provided.
2. In existing elevators, a signal indicating the direction of car travel shall not be required.

**407.2.2.2 Visible signals.** Visible signal fixtures shall be centered at 72 inches (1830 mm) minimum above the floor. The visible signal elements shall be 2 1/2 inches (64 mm) minimum between the uppermost and lowest edges of the illuminated shape measured vertically. Signals shall be visible from the floor area adjacent to the hall call button.

**Exceptions:**
1. Destination-oriented elevators shall be permitted to have signals visible from the floor area adjacent to the hoistway entrance.
2. Existing elevators shall not be required to comply with this section.

(No change to figure)

**FIGURE 407.2.2.2 407.2.4.2 (A) ELEVATOR VISIBLE SIGNALS**

**HEIGHT OF SIGNALS**

(No change to figure)

**FIGURE 407.2.2.2 407.2.4.2 (B) ELEVATOR VISIBLE SIGNALS**

**SIZE OF SIGNALS**

**407.2.2.3 Audible signals.** Audible signals shall sound once for the up direction and twice for the down direction, or shall have verbal annunciators that indicate the direction of elevator car travel. Audible signals shall have a frequency of 1500 Hz maximum. Verbal annunciators shall have a frequency of 300 Hz minimum and 3,000 Hz maximum. The audible signal or verbal annunciator shall be 10 dBA minimum above ambient, but shall not exceed 80 dBA, measured at the hall call button.

**Exceptions:**
1. Destination-oriented elevators shall not be required to comply with this section, provided the audible tone and verbal announcement is the same as those given at the call button or call button keypad.
2. The requirement for the frequency and range of audible signals shall not apply in existing elevators.

**407.2.4.4 Destination-oriented elevator signals.** Destination-oriented elevators shall be provided with hall call consoles complying with Section 407.2.3 and with a visible signal and audible tones and verbal announcements to indicate which car is responding to a call. The audible tone and verbal announcement shall be activated by pressing an accessibility function button.

**407.2.4.4.1 Verbal Announcement.** When the accessibility function button is pressed, verbal announcement such as the car designation shall be provided at the elevator car
entrance upon arrival. Audio output shall be recorded digitized human or synthesized speech and shall be delivered through a loudspeaker. The verbal annunciator shall have a frequency of 300 Hz minimum and 3000 Hz maximum. Auditory volume, measured 35 inches (890 mm) in front of the elevator entrance and at 48 inches (1220 mm) above the floor, shall be maintained at a minimum of 10 dBA. The volume shall not exceed 80 dBA.

**407.2.4.5 407.2.2.4 Differentiation.** Each destination-oriented elevator in a bank group of elevators shall have audible and visible means for differentiation.

**407.2.3 407.2.5 Hoistway signs.** Signs at elevator hoistways shall comply with Section 407.2.3 407.2.5.

**407.2.3.1 407.2.5.1 Floor designation.** Floor designations shall be provided in raised characters and braille complying with Sections 703.3 and 703.4. Raised characters shall be 2 inches (51 mm) minimum in height. Floor designations shall be located on both jambs of elevator hoist-way entrances. A raised star shall be provided on both jambs at the main entry level.

*Note: No change to figure*

**FIGURE 407.2.3.1 407.2.5.1**

**FLOOR DESIGNATION**

**407.2.3.2 407.2.5.2 Car identification.** Destination-oriented elevators cars shall be designated with a single alphabetic character or an alphanumeric designations such as “A1”. Car identification shall be provided in raised characters and braille complying with Sections 703.3 703.3.1 through 703.3.9 and 703.4 703.4.1 through 703.4.4. Raised characters shall be 2 inches (51 mm) minimum in height. Car identifications shall be located on both jambs of the hoistway immediately below the floor designation.

*Note: No change to figure*

**FIGURE 407.2.3.2-407.2.5.2**

**DESTINATION-ORIENTED ELEVATOR CAR IDENTIFICATION**

**407.2.4 407.2.6 Destination signs.** Where signs indicate that elevators do not serve all landings, signs in raised characters and braille complying with Sections 703.3 703.3.1 through 703.3.9 and 703.4 703.4.1 through 703.4.4 shall be provided above the hall call button or keypad.

**Exception:** Destination oriented elevator systems shall not be required to comply with this section.

*Note: No change to Sections 407.3 through 407.4.6.*

**407.4.7 Designations and indicators of car controls.** Designations and indicators of car controls shall comply with Section 407.4.7.
Exceptions:

1. In existing elevators, where a new car operating panel complying with Section 407.4.7 is provided, existing car operating panels shall not be required to comply with Section 407.4.7.

2. Where existing building floor designations differ from the arrangement required by Section 407.4.6.2.2, or are alphanumeric, a new operating panel shall be permitted to use such existing building floor designations.

407.4.7.1 Buttons. Car control buttons shall comply with Section 407.4.7.1.

407.4.7.1.1 Type. Control buttons shall be identified by raised characters and braille complying with Sections 703.3 through 703.3.9 and 703.4 through 703.4.4.

407.4.7.1.2 Designation. Floors shall be designated . . . -4, -3, -2, -1, 0, 1, 2, 3, 4, etcetera, with floors below the main entry floor designated with minus numbers. Numbers shall be permitted to be omitted, provided the remaining numbers are in sequence. Where a telephone keypad arrangement is used complying with Figure 707.5(A), the number key (“#”) shall be utilized to enter the minus symbol (“-”). A minus sign (-) on the lower right button is permitted instead of the number (#) sign. Ancillary letters shall be permitted to be used in conjunction with the numbers, provided the letters are located to the right of the numbers and not more than two letters are used for each floor designation. For access to special floors, such as floors with rear entrances, instructions shall be provided at the keypad or console.

407.4.7.1.2.1 In existing facilities where new elevators are installed or existing elevators are altered into a destination-oriented elevator system, floor designations shall conform to the following:

1. Levels within stories, such as mezzanines located above or below the main entry level shall be permitted to be designated with an alphanumeric character such as "M2", indicating "mezzanine" and the "story number", respectively, in which it is located, provided there is no duplication with alphanumeric designations of elevator cars in the facility. The entire word shall be used, when announced, for the floor description, e.g., "mezzanine" not "M".

2. Non-successive floor numbering shall be permitted.

407.4.7.1.3 Location. Raised character and braille designations shall be placed immediately to the left of the control button to which the designations apply. Where a negative number is used to indicate a negative floor, the braille designation shall be a cell with the dots 3 and 6 followed by the ordinal number.

Exception: Where space on an existing car operating panel precludes raised characters and braille to the left of the control button, markings shall be placed as near to the control button as possible.

407.4.7.1.4 Symbols. The control button for the emergency stop, alarm, door open,
door close, main entry floor, and phone, shall be identified with raised symbols and braille as shown in Table 407.4.7.1.4.

**TABLE 407.4.7.1.4 -CONTROL BUTTON IDENTIFICATION**

*(No change to table)*

407.4.7.1.5 **Visible indicators.** Buttons with floor designations shall be provided with visible indicators to show that a call has been registered. The visible indication shall extinguish when the car arrives at the designated floor.

407.4.7.2 **Keypads.** Keypad keys shall be identified by visual characters complying with Section 703.2 centered on the corresponding keypad button. The number five key shall have a single raised dot. The dot shall have a base diameter of 0.118 inch (3 mm) minimum and 0.120 inch (3.05 mm) maximum, and a height of 0.025 inch (0.6 mm) minimum and 0.037 inch (0.9 mm) maximum. The dot shall be centrally located.

Note: No changes to remaining sections – 407.4.8 through 407.4.10.3.

**REASON:** Note: It is not the intent of NEII that any of the changes proposed here override other change proposals from NEII for Section 407. If this change and other changes are approved, the changes will need to be merged/coordinated for the final document.

**General Rationale:** The purpose of this proposal is to update ICC A117.1 to include additional requirements for destination-oriented elevator systems, including the use of “Touch Screens” and related features such as consoles and function buttons, along with verbal announcements. The following proposals are to harmonize with changes being finalized in ASME A17.1/CSA B44, Appendix E. The proposals were developed to ensure that systems currently designed for compliance with the destination-oriented elevator accessibility requirements in the California Building Code (CBC), would also comply with this code. Also included some editorial clean up to make format consistent with other sections of the standard.

**Section 107 Rationale:** Proposed revision to add definitions for the accessibility function button and hall call console used by destination-oriented elevator systems.

**Section 407.2, 407.2.1, and 407.2.2 Rationale:** The proposal restructures this section for inclusion of additional requirements for destination-oriented elevators. The proposal includes language to requires that the accessibility function button and hall consoles be mounted within a specific reach range for easy access. Requirement 407.2.1.7 was relocated to 407.2.4.4 to group with other signals. Added a reference in 407.2.2 to the Figure showing the “standard telephone keypad arrangement.” Clarify that 407.2.1.2 applies to all buttons in the hall (call buttons, keypads, and hall call consoles). Current A117.1 requires all buttons including keypad buttons, accessibility button and any optional additional button(s) to be ¾ inch minimum smallest dimension.

**Section 407.2.3 Rationale:** The proposed revision adds requirements for hall consoles, touch screens, and display screens to harmonize with A17.1/B44 Appendix E. The proposed changes
include a requirement that verbal announcements be provided when the accessibility function button is activated. The proposed changes also specify the arrangement for hall call consoles including keypad and touch screen arrangements and their locations, as well as the arrangement and identification of additional buttons and features of the hall call console. The hall call consoles must be able to interface with security systems. A provision is also provided to assign an adjacent car when the accessibility function button is used to select a floor.

**Section 407.2.4 Rationale:** The proposed revisions groups the hall signal requirements. It requires verbal announcements in the car when the car stops to answer the call and at the car entrance when the car arrives to answer the call. The requirements for volume characteristics are consistent with other announcements. Requirement 407.2.4.4 was relocated from 407.2.1.7 to group with other signals. The word “Accessibility” was added to clarify the purpose of the function button and “minimum” was added to clarify that the size for the symbol is a minimum. The language was revised to use the term “group” instead of “bank” to be consistent with common industry terminology.

**Section 407.2.5 and 407.2.6 Rationale:** The requirements are being renumbered as part of the overall reformatting. 407.2.5.2 was revised to provide identification of cars with an alphabetic identification, or alpha-numeric identification, if necessary.

**Section 407.2.7.1 Rationale:** The references are being revised to ensure that they align with the exceptions in 703.3 and 703.4 since elevators are exempted from 703.3.10 and 703.4.5 already and 703.3.11 does not apply to elevators (only door signs). Currently, A117.1 requires the use of the number (#) button to indicate minus (-). The California Building Code requires the use of the minus (-) symbol. This proposal is to permit either symbol to be used. Also added a requirement for instructions be provided to access special floors. In existing buildings, the convention for numbering of floors may already be established and should not need to be revised. Where special names such as “mezzanine” are used, the entire word should be announced, not just the first letter. Also provided an exception for buildings where a certain floor number is not to be used.

**Section 407.2.7.2 Rationale:** The proposed revision clarifies the position for the dot on the “5” key to align with changes to Appendix E. That change was made based on input from a committee member with limited vision who indicated that if the dot is not centered, it impairs quick location of the "5" key.

Committee Action: 28-3-4 As Submitted

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:** The new requirements for destination oriented elevators will clarify requirements and improve accessibility. This is also coordinated with ASME A17.1.
04-24 – 2021 Public Comment 1
407.2.3.7.2

Proponent: Marsha Mazz, representing the Terminology Work Group

Further revise as follows:

SECTION 407
ELEVATORS

407.2.3 Hall Call Consoles. Hall call consoles shall comply with the following requirements:

407.2.3.7 Arrangement. Hall call console arrangement of required features shall comply with Section 407.2.3.7.

407.2.3.7.2 Touch screen call console arrangement. Where touch screen call consoles are provided, the touch screen shall be located directly above the accessibility function button. Any portion of the touch screen requiring user input shall be located within the applicable reach range at a maximum height of 48 inches (1220 mm), above the finished floor. The accessibility function button shall be located within the applicable reach range and at a height not less than 30 inches (760 mm), measured to the centerline of the button, above the finished floor.

REASON: This is part of the generic terminology proposal from the Terminology Work Group for building blocks. This public comment is submitted here because this is a new requirement related to reach ranges. Please see the full proposal for complete information.

The current references sometimes references Section 308 and sometimes not. The adjective varies from ‘at least one of’ or ‘specified’. The work group is suggesting ‘applicable’.

Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:
Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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| BALLOT COMMENT 1 - FIRST DRAFT: |
| Proponent: Rex Pace representing HUD |
| Desired Action: Affirmative with Comment |
| Modification: | |
| Reason: Deferred to the view of those with expertise on this subject |

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| Desired Action: | |
| Modification: | |
| Reason: | |

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04-25 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-25 – 2021

407.2.1.1

**Proponent:** Kevin Brinkman representing National Elevator Industry, Inc. (NEII)

**Revise as follows:**

**SECTION 407 ELEVATORS**

407.2.1.1 **Height.** Call buttons and keypads shall be located within one of the reach ranges specified in Section 308, measured to the centerline of the highest operable part vertically between 30 inches (760 mm) and 48 inches (1,220 mm) above the floor, measured to the centerline of the respective button.

**Exceptions:**

1. Existing call buttons and existing keypads shall be permitted to be located 54 inches (1,370 mm) maximum above the floor, measured to the centerline of the highest operable part.
2. Where additional call buttons, keypads or other means are provided, they shall be permitted to be located outside the specified reach range.

**REASON:** The proposed change would specify an upper and lower range rather than the more general reference to reach ranges and clarify that all the buttons need to be within the range. This is similar to the requirements in ASME A17.1/CSA B44, Appendix E. The additional exception allows alternate technologies, such as foot controls, in addition to the required...
controls. Figure 407.2.1.1 should either be deleted or be updated to accurately reflect the prescriptive requirement. The minimum height was chosen to align with a more appropriate value for lower reach for a standing person and is still well above the lower reach for a person in a wheelchair (15 inches).

REPORT OF HEARING:
Modification (if any): Question was split into 2 parts
Main paragraph Committee Action: 28-1-2 As Modified
Exception 2 Committee Action: 29-3-5 Disapproved

Further modify as follows:

407.2.1.1 Height. Call buttons and keypads shall be located vertically between 30 inches (760 mm) minimum and 48 inches (1220 mm) maximum above the floor, measured to the centerline of the respective button operable parts.

Exception: Existing call buttons and existing keypads shall be permitted to be located 54 inches (1370 mm) maximum above the floor, measured to the centerline of the highest operable part.

Committee Reason: The modifications to the first sentence for the dimensions was to allow for a range that included end points. The modification to change ‘respective button’ to ‘operable parts’ was to address keypads. The committee approved the changes to the main paragraph as providing a better range and information on call buttons. The committee voted to disapprove the new Exception 2 because they felt it was too broad and could be interpreted incorrectly for situations where there were multiple call buttons in the same elevator lobby.

04-25 – 2021 Ballot Comments

| BALLOT COMMENT 1- FIRST DRAFT: |
| Proponent: Rex Pace representing HUD |
| Desired Action: Affirmative with comment- (1st & 2nd split) |
| Modification: |
| Reason: Deferred to the view of those with expertise on this subject. (1st & 2nd split) |

| BALLOT COMMENT 2- FIRST DRAFT: |
| Proponent: Kevin Brinkman representing NEII |
| Desired Action: Negative with comment-2nd split |
| Modification: See Ballot comment 2 |

04-25 – 2021 Ballot Comment 2
407.2.1.1
Proponent: Kevin Brinkman, NEII

Further revise as follows:

SECTION 407
ELEVATORS

407.2.1.1 Height. Call buttons and keypads shall be located vertically between 30 inches (760 mm) and 48 inches (1220 mm) above the floor, measured to the centerline of the respective button.

Exceptions:
1. Existing call buttons and existing keypads shall be permitted to be located 54 inches (1370 mm) maximum above the floor, measured to the centerline of the highest operable part.
2. Where additional call buttons, keypads or other means are provided, they shall be permitted to be located outside the specified reach range. Where foot controls or other alternate means are provided in addition to the required landing controls, the foot controls or other alternate means shall be permitted to be mounted outside the specified range.

REASON: The exception is an important part of the overall change because the new lower limit would preclude the use of foot controls which have become more popular due to COVID. A concern was raised that the exception as written might mean that one set of controls could be in the range and duplicate controls on the opposite wall or between other hoistway doors could be outside the range.

Committee Action for Ballot Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-25 Brinkman.doc

04-25 – 2021 Public Comment 1
407.2.1.1

Proponent: Marsha Mazz, representing the Terminology Work Group

Further revise as follows:

SECTION 407
ELEVATORS
407.2.1 Call Controls

407.2.1.1 Height. Call buttons and keypads shall be located within the applicable reach range, and not less than vertically 30 inches (760 mm) minimum and 48 inches (1220 mm) maximum above the floor, measured to the centerline of the operable parts.

Exceptions:
1. Existing call buttons and existing keypads shall be permitted to be located 54 inches (1370 mm) maximum above the floor, measured to the centerline of the highest operable part.
2. Where additional call buttons, keypads or other means are provided, they shall be permitted to be located outside the specified applicable reach range.

Figure 407.2.1.1
HEIGHT OF ELEVATOR CALL BUTTONS

REASON: This is part of the generic terminology proposal from the Terminology Work Group for building blocks. This public comment is submitted here because this is a new requirement related to reach ranges. Please see the full proposal for complete information. The current references sometimes references Section 308 and sometimes not. The adjective varies from ‘at least one of’ or ‘specified’. The work group is suggesting ‘applicable’.

Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-25 – 2021 Public Comment 2
407.2.1.1

Proponent: Tim Ditman

Further revise as follows:

SECTION 407
ELEVATORS

407.2.1.1 Height. Call buttons and keypads shall be located within one of the reach ranges specified in Section 308, measured to the centerline of the highest operable parts vertically 30 inches (760 mm) minimum and 48 inches (1220 mm) maximum above the floor, measured to the centerline of the operable parts.
Exceptions:

1. Existing call buttons and existing keypads shall be permitted to be located 54 inches (1370 mm) maximum above the floor, measured to the centerline of the highest operable part.

2. Where additional call buttons, keypads or other means are provided, they shall be permitted to be located outside the specified reach range.

REASON: The reason provided for changing the minimum height to the 30 inches was “to align with a more appropriate value for lower reach for a standing person”. Regarding A117.1’s purpose, Section 102.1 of A117.1 – 2017 states, “this standard makes sites, facilities, buildings and elements accessible to and usable by people with such physical disabilities as the inability walk, difficulty walking, reliance on walking aids, blindness and visual impairment, deafness and hearing impairment, incoordination, reaching and manipulation disabilities, lack of stamina, difficulty interpreting and reacting to sensory information, and extremes of physical size” however, a ‘standing person’ is notably absent from the stated purpose of A117.1. It treats disabled persons less favorably when the A117.1 is modified to place elevator operable parts in convenient locations for non-disabled persons, while the standard for operable parts in Section 308 reflects data that was deemed inappropriate for safety reasons.

The ICC needs to update the unobstructed low reach to “24 inches (610 mm) minimum above the floor” in ICC A117.1 Sections 308.2.1 and 308.3.1, along with any other low reach limit requirements. Section 308 of the 2024 A117.1 update should reflect current research from 2010 rather than continue to use standards derived from antiquated research conducted almost fifty years ago. The ICC established an Electrical Receptacles Task Group for A117.1 2024 and was, among other things, assigned to “7. Review available data on the reach ranges of individuals using wheeled mobility devices.” (https://www.iccsafe.org/wp-content/uploads/asc_a117_1/Residential-Receptacles-Task-Group-Scope-and-Objectives-2022-03-09-FIN.pdf) Despite being providing with the following information in March of 2023, which clearly highlights the importance of raising the lower reach range to a height that is safe for individuals using wheeled mobility devices, the only change that came from this task group was clarification for where to measure for operable parts, which does nothing to improve the safety of electrical receptacles.

“The technical requirements of the ICC/ANSI A117.1 (1998) Accessible and Usable Buildings and Facilities (ICC/ANSI) were generated from research completed from 1974 -1978 using a research sample that included about 60 individuals who used wheelchairs (see Steinfeld et al., 1979).” See The 2010 Anthropometry of Wheeled Mobility Project final report, December 31, 2010, PDF page 5 of 173, available at [http://idea.ap.buffalo.edu/wp-content/uploads/sites/110/2020/01/AnthropometryofWheeledMobilityProject_FinalReport.pdf](http://idea.ap.buffalo.edu/wp-content/uploads/sites/110/2020/01/AnthropometryofWheeledMobilityProject_FinalReport.pdf). The 2010 research study had a sample of 495 wheeled mobility devices (“WhMD”) users, and documented that none of the WhMD users could safely achieve the unobstructed low reach of 15 inches. (See PDF page 71 of 173, Figure 3-15 and PDF page 73 of 173, Figure 3-16) Below are two key observations with respect to minimum low reach.

1. PDF page 9 of 173, “12. Reach limits: A majority of WhMD users cannot complete a forward reach to the minimum forward reach height in U.S. standards on a vertical
plane in front of their anterior most point (toes or device). The current high side reach limit accommodates WhMD users. The low reach limit, as defined, is currently **inappropriate for safety reasons.**” (emphasis added)

2. PDF page 70 of 173, “The lower limit of the U.S. standard would need to be raised from 380 mm (15 in.) to at least 600 mm (23.6 in.) in order to accommodate over 70%, 50% and 38% of our study’s manual wheelchair users, powered chair users and scooter users, respectively.”

Electrical outlets are just one example of operable parts that WhMD users encounter. In the December 2017 issue of Consumer Reports’ magazine, the article entitled, “Make Your Home Elder-Friendly” ([available at](https://www.consumerreports.org/home-improvement-remodeling/elder-friendly-home/)) addresses affordable upgrades using universal design when renovating a home. The article noted that design and construction upgrades could benefit persons with mobility disabilities by stating, “These [universal] design elements can also make a big difference if you lose mobility—after all, more than 35 percent of people age 65 and older in the U.S. are disabled, according to a 2016 report from the University of New Hampshire's Institute on Disability.” Consumer Reports addressed minimum height of electrical receptacles and recommended, “setting new electrical outlets 24 inches off the floor instead of the usual 12 to 18” which would, “eliminate the stooping usually required to plug in a vacuum”. Consumer Reports added that there is, “no cost for resetting outlets” at this accessible location.

Additionally, there should not be any child safety concerns about raising the receptacles to an accessible height for mobility-impaired individuals because Tamper Resistant (TR) receptacles have been mandated in dwelling units since 2008 to address this potential issue ([See National Electrical Code (NEC) 2008 Section 406.12, Tamper-Resistant Receptacles in Dwelling Units](https://www.consumerreports.org/home-improvement-remodeling/elder-friendly-home/)).

When amending the Fair Housing Act in 1988, Congress clearly intended to cover ‘persons with mobility impairments’ by stating that ‘switches and other controls must be in convenient locations’, Congress also did not want mobility-impaired persons going through the financial burden and inconvenience of resetting outlet heights when they could have been set at an actual accessible and safe height at the time of construction for **zero** cost.

“Because persons with mobility impairments need to be able to get into and around a dwelling unit (or else they are in effect excluded because of their handicap), the bill requires that in the future covered multifamily dwellings be accessible and adaptable. This means that the doors and hallways must be wide enough to accommodate wheelchairs, switches and other controls must be in **convenient** locations, most rooms and spaces must be on an accessible route, and disabled persons should be able to easily make additional accommodations if needed, such as installing grab bars in the bathroom, without major renovation or structural change.” (emphasis added)


**Committee Action for Public Comment 2:**
REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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Modification (if any):

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<td><strong>Modification:</strong></td>
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<td><strong>Reason:</strong> Deferred to the view of those with expertise on this subject. (1st &amp; 2nd split)</td>
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<tr>
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<td><strong>Modification:</strong> The following language is a direct replacement for the original proposed language for Exception 2: 2. Where foot controls or other alternate means are provided in addition to the required landing controls, the foot controls or other alternate means shall be permitted to be mounted outside the specified range.</td>
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<td><strong>Reason:</strong> The exception is an important part of the overall change because the new lower limit would preclude the use of foot controls which have become more popular due to COVID. A concern was raised that the exception as written might mean that one set of controls could be in the range and duplicate controls on the opposite wall or between other hoistway doors could be outside the range.</td>
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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-26 – 2021

407.2.3.1

**Proponent:** Kevin Brinkman, representing National Elevator Industry, Inc. (NEII)

**Revise as follows:**

**SECTION 407**

**ELEVATORS**

407.2.3 **Hoistway signs.** Signs at elevator hoistways shall comply with Section 407.2.3.

407.2.3.1 **Floor designation.** Floor designations shall be provided in raised characters and braille complying with Sections 703.3 and 703.4. Raised characters shall be 2 inches (51 mm) minimum in height. Floor designations shall be located on both jambs of elevator hoistway entrances. A raised star, placed to the left of the floor designation, shall be provided on both jambs at the main entry level. The outside diameter of the star shall be 2 inches (51 mm) and all points shall be of equal length.

**REASON:** The proposed change would clarify the location for the star symbol and provide requirements for the size and shape of the symbol.

Staff note: Tabled until 7/14/22 meeting along with 04-27 & 04-28

Committee Action: 20-0-4 Disapproved

**REPORT OF HEARING:**

Modification (if any):

**Committee Reason:** Disapproval based on previous committee action on 04-27.
04-26 – 2021 Ballot Comments

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Doug Anderson, AHLA
Desired Action: Negative with comment
Modification:
Reason: There should be an allowance for the star to be located below the floor designation when the jamb size is not large enough to accommodate the floor designation and 2” Star on the same line.

BALLOT COMMENT 2- FIRST DRAFT:
Proponent: Kevin Brinkman representing NEII
Desired Action: Negative with comment
Modification:
Reason: This was disapproved based on the action taken on 04-27; however, the correct approach should have been to approve as modified based on the language approved for 04-27 since these proposals were discussed together because the impacted the same requirement. This was the approach used when voting on a later proposal 06-06 at the recommendation of the chair.

Staff Note: Disapproval this change does not change the result of 04-27.

Committee Action for First Ballot:

REPORT OF HEARING:
Modification (if any):
Committee Reason:

Report for 04-26–2021

Committee decision: D | Committee Vote at Meeting: 20-0-4 | Committee Vote on Ballot: 38-2-1

REPORT OF HEARING:
Modification (if any):
Committee Reason: Disapproval based on previous committee action on 04-27.

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Doug Anderson, AHLA
Desired Action: Negative with comment
Modification:
Reason: There should be an allowance for the star to be located below the floor designation when the jamb size is not large enough to accommodate the floor designation and 2” Star on the same line.

BALLOT COMMENT 2- FIRST DRAFT:
Proponent: Kevin Brinkman representing NEII
### Report for 04-26–2021

**Desired Action:** Negative with comment

**Modification:**

Reason: This was disapproved based on the action taken on 04-27; however, the correct approach should have been to approve as modified based on the language approved for 04-27 since these proposals were discussed together because the impacted the same requirement. This was the approach used when voting on a later proposal 06-06 at the recommendation of the chair.

**Staff Note:** Disapproval this change does not change the result of 04-27.

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**REPORT OF HEARING – FIRST DRAFT**

Modification (if any):

Committee Reason:

**BALLOT COMMENT- SECOND DRAFT:**

Proponent:

Desired Action:

Modification:

Reason:

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**FINAL ACTION:**

Modification (if any):

Committee Reason:
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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed

revision below

04-27 – 2021

407.2.3.1

Proponent: Gene Boecker, Code Consultants, Inc.

Revise as follows:

SECTION 407
ELEVATORS

407.2.3 Hoistway signs. Signs at elevator hoistways shall comply with Section 407.2.3.

407.2.3.1 Floor designation. Floor designations shall be provided in raised characters and braille complying with Sections 703.3 and 703.4. Raised characters shall be 2 inches (51 mm) minimum in height. Floor designations shall be located on both jambs of elevator hoistway entrances. A raised star shall be provided on both jambs at the main entry level. The outside diameter of the star shall be 2 inches (51 mm) and all points shall be of equal length.

**REASON:** This has two changes focused on the same issue. The first is to delete the word “minimum” from the requirement. The height of the floor designation characters must be standardized. I have recently seen a proposal for floor numbers that were 5 inches in height. Most of the time, the characters are a standard 2-inch height but not always. This also make them the same size on every floor which would not be required if the work “minimum” was maintained.

The second is to make sure that the star stays a star, consistent with the image in Table 407.4.7.1.4. The current text only addresses height and results in many cases of having a star that is 2 inches high and 1 inch wide. The added sentence is borrowed from the California Building Code which amends that comparable section of the 2010 Standards in their adoption.

____________________________________________________
407.2.3.1 Floor designation. Floor designations shall be provided in raised characters and braille complying with Sections 703.3 and 703.4, except that raised characters shall be 2 inches (51 mm) minimum in height. Floor designations shall be located on both jambs of elevator hoistway entrances. A raised five-pointed star polygon that is equilateral and equiangular, shall be provided on both jambs at the main entry level, and shall be placed to the left of the floor designation. The star symbol and braille shall be as shown in Table 407.4.7.1.4. The height of the star shall match the height of the floor designation measured from the base of the star to the top of the star. The entire surface of the star shall be raised.

Note: Modify Fig. 407.2.3.1 to show dimensions from base of star to top of star
Figure 407.2.3.1
Floor Designation

Reason: The intent of the modification is to 1) clarify that the character height is an exception to the requirements in 703.3 and 703.4 and is not in conflict, 2) to specify the location of the star relative to the floor designation, and to 3) provide additional requirements for the star to ensure that it is filled in and proportional.

For reference: https://en.wikipedia.org/wiki/Star_polygon#Regular_star_polygon. Description for a “pentagram” which is a “five-pointed star polygon that is equilateral and equiangular”.

Staff note: Tabled until 7/14/22 meeting along with 04-26 & 04-28
Committee Action: 19-2-5 Approved as Modified
REPORT OF HEARING:
Modification (if any):
Replace the proposal with the following:

407.2.3.1 Floor designation. Floor designations shall be provided in raised characters and braille complying with Sections 703.3 and 703.4, except that raised characters shall be 2 inches (51 mm) minimum in height. Floor designations shall be located on both jambs of elevator hoistway entrances. A raised five-pointed star polygon that is equilateral and equiangular, shall be provided on both jambs at the main entry level, and shall be placed to the left of the floor designation. The star symbol and braille shall be as shown in Table 407.4.7.1.4. The height of the star shall match the height of the floor designation measured from the base of the star to the top of the star. The entire surface of the star shall be raised.
**Committee Reason:** The modification replaced the original proposal. This proposal clarified that at the jambs of elevators, the numbers should be larger than the standard raised letter requirement to allow for the number to serve both as a visual and tactile sign. The letters will not be too large because the size is limited by the size of the jamb. The modification clarified the requirements for the star, including shape, location, solid, braille and the size.

**Note:** Modify Fig. 407.2.3.1 to show dimensions from base of star to top of star

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**04-27 – 2021 Ballot Comments**

**BALLOT COMMENT 1 - FIRST DRAFT:**

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<td>Reason: There should be an allowance for the star to be located below the floor designation when the jamb size is not large enough to accommodate the floor designation and 2” Star on the same line.</td>
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**Committee Action for First Ballot:**

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:**

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**Report for 04-27– 2021**

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**407.2.3.1 Floor designation.** Floor designations shall be provided in raised characters and braille complying with Sections 703.3 and 703.4, except that raised-Raised characters shall be 2 inches (51 mm) minimum in height. Floor designations shall be located on both jambs of elevator hoistway entrances. A raised five-pointed star polygon that is equilateral and equiangular shall be provided on both jambs at the main entry level, and shall be placed to the left of the floor designation. The star symbol and braille shall be as shown in Table 407.4.7.1.4. The height of the star shall match the height of the floor designation measured from the base of the star to the top of the star. The entire surface of the star shall be raised.

**Note:** Modify Fig. 407.2.3.1 to show dimensions from base of star to top of star

**Committee Reason:** The modification replaced the original proposal. This proposal clarified that at the jambs of elevators, the numbers should be larger than the standard raised letter requirement to allow for the number to serve both as a visual and tactile sign. The letters will not be too large because the size is limited by the size of the jamb. The modification clarified the requirements for the star, including shape, location, solid, braille and the size.

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-28 – 2021

407.2.3.1

**Proponent:** Sharon Toji, Access Communications

**Revise as follows:**

**SECTION 407**
**ELEVATORS**

407.2.3 **Hoistway signs.** Signs at elevator hoistways shall comply with Section 407.2.3.

407.2.3.1 **Floor designation.** Floor designations shall be provided in raised characters and braille complying with Sections 703.3 and 703.4. Raised characters shall be 2 inches (51 mm) **minimum** in height. Floor designations shall be located on both jambs of elevator hoistway entrances. A raised star shall be provided on both jambs at the main entry level. When a star and a floor designation are provided, both the star and the floor designation shall be accompanied by braille.

**REASON:** Almost universally, elevator hoistway signs on the main floor of buildings include braille only for the star and not the floor designation. Often people need to know what floor they are on, not that it is the exit floor. Since elevator installers don’t seem to look carefully at the figure, and it is the text that provides the legal requirement, this addition appears necessary.

Staff note: Tabled until 7/14/22 meeting along with 04-26 & 04-27

Committee Action: 21-1-1 Disapproved

**REPORT OF HEARING:**

**Modification (if any):**
Committee Reason: Disapproval based on previous committee action on 04-27.

04-28 – 2021 Ballot Comments

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Kevin Brinkman representing NEII
Desired Action: Negative with comment
Modification:
Reason: This was disapproved based on the action taken on 04-27; however, the correct approach should have been to approve as modified based on the language approved for 04-27 since these proposals were discussed together because they impacted the same requirement. This was the approach used when voting on a later proposal 06-06 at the recommendation of the chair.

Staff Note: Disapproval this change does not change the result of 04-27.

Committee Action for First Ballot:
REPORT OF HEARING:
Modification (if any):
Committee Reason:

Report for 04-28– 2021
Committee decision: D
Committee Vote at Meeting: 21-1-1
Committee Vote on Ballot: 39-1-1
REPORT OF HEARING:
Modification (if any):
Committee Reason: Disapproval based on previous committee action on 04-27.

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Kevin Brinkman representing NEII
Desired Action: Negative with comment
Modification:
Reason: This was disapproved based on the action taken on 04-27; however, the correct approach should have been to approve as modified based on the language approved for 04-27 since these proposals were discussed together because they impacted the same requirement. This was the approach used when voting on a later proposal 06-06 at the recommendation of the chair.

Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:
REPORT OF HEARING – FIRST DRAFT
Modification (if any):
Committee Reason:
BALLOT COMMENT- SECOND DRAFT:
Proponent:
Desired Action:
Modification:
Reason:
Committee decision: AS/AM/D
Committee Vote at Meeting: 
Committee Vote on Ballot: 
FINAL ACTION:
Modification (if any):
04-30 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-30 – 2021

407.4.7.1.1

**Proponent:** Marsha K. Mazz, representing United Spinal Association

**Revise as follows:**

SECTION 407
ELEVATORS

407.4.7.1 Buttons. Car control buttons shall comply with Section 407.4.7.1.

407.4.7.1.1 **Type Control Identification.** Control buttons shall be identified by raised characters and braille complying with Sections 703.3.1 through 703.3.9 and 703.4.1 through 703.4.4. Either the raised characters or identification provided on the face of the control buttons shall contrast visually with their background with either light characters on a dark background, or dark characters on a light background. Contrasting identification provided on control buttons shall not rely on internal illumination of the button.

**REASON:** People with usable low vision typically do not read tactiely. Often, such people complain about unreadable elevator car controls. We are proposing to omit the reference to Section 703.3.12 *Finish and Contrast* on raised characters. This subsection contains an exception that allows raised characters to not comply with the requirements for finish and contrast where separate visual characters with the same information are provided.

Although visual characters on signs would be required to comply with the provisions for finish and contrast, elevator car controls are not subject to the requirements for visual characters. Therefore, people with low vision are not afforded visual access to car control identification provided. This proposal would remedy that oversight and would allow two options for providing visual contrast. We deliberately did not propose to require compliance with Section 703.3.12
because that section contains provisions for a non-glare finish which might be difficult to achieve on a lighted car control button. The additional changes to the referenced sections align with the exceptions in 703.3 and 703.4 since elevators are exempted from 703.3.10 and 703.4.5 and 703.3.11 does not apply to elevators (only signs).

We also proposed a change to the section title because the word “type” fails to describe the subject of the requirement and the word is not used in the text.

Committee Action: 26-2-5 As Modified

REPORT OF HEARING:
Modification (if any):

Further modify as follows:

407.4.7.1.1 Control Identification. Control buttons shall be identified by raised characters and braille complying with Sections 703.3.1 through 703.3.9 and 703.4.1 through 703.4.4. Either the raised characters or identification provided on the face of the control buttons shall contrast visually with their background with either light characters on a dark background, or dark characters on a light background. Contrasting identification provided on control buttons shall not rely on internal illumination of the button.

Committee Reason: The modification to move the phrase “raised character” is editorial and clarifies that there are two distinct locations. The proposal was approved. The change to the first sentence is a more specific reference. The added text adds appropriate requirements for contrast (similar to Section 703.3.12). The contrast should not rely on the buttons lighting up because that is typically when the floors are registered for the elevator to stop.

04-30 – 2021 Ballot Comments

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Kevin Brinkman representing NEII
Desired Action: Affirmative with comment
Modification: See Ballot Comment 1

04-30 – 2021 Ballot Comment 1
407.4.7.1.1

Proponent: Kevin Brinkman, NEII

Further revise as follows:
407.4.7.1.1 Control Identification. Control buttons shall be identified by raised characters and braille complying with Sections 703.3.1 through 703.3.9 and 703.4.1 through 703.4.4. Either the identification provided on the face of the control buttons or the raised characters required by Section 407.4.7.1.3 shall contrast visually with their background with either light characters on a dark background, or dark characters on a light background. Contrasting identification provided on control buttons shall not rely on internal illumination of the button.

**REASON:** Suggest further modifying the new language to clearly indicate which characters

Committee Action for Ballot Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason: 04-30 Brinkman.doc

Committee decision: AM
Committee Vote at Meeting: 26-2-5
Committee Vote on Ballot: 39-1-1

REPORT OF HEARING:

Modification (if any):

Further modify as follows:

407.4.7.1.1 Control Identification. Control buttons shall be identified by raised characters and braille complying with Sections 703.3.1 through 703.3.9 and 703.4.1 through 703.4.4. Either the raised characters or identification provided on the face of the control buttons or raised characters shall contrast visually with their background with either light characters on a dark background, or dark characters on a light background. Contrasting identification provided on control buttons shall not rely on internal illumination of the button.

Committee Reason: The modification to move the phrase “raised character” is editorial and clarifies that there are two distinct locations. The proposal was approved. The change to the first sentence is a more specific reference. The added text adds appropriate requirements for contrast (similar to Section 703.3.12). The contrast should not rely on the buttons lighting up because that is typically when the floors are registered for the elevator to stop.

**BALLOT COMMENT 1- FIRST DRAFT:**

Proponent: Kevin Brinkman representing NEII
Desired Action: Affirmative with comment

Modification:

Either the identification provided on the face of the control buttons or the raised characters required by Section 407.4.7.1.3 shall contrast visually with their background with either light characters on a dark background, or dark characters on a light background. Contrasting identification provided on control buttons shall not rely on internal illumination of the button.

Reason: Suggest further modifying the new language to clearly indicate which characters

Committee decision: AS/AM/D
Committee Vote at Meeting: 
Committee Vote on Ballot:
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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-31 – 2021
407.4.7.1.2

Proponent: Gene Boecker, Code Consultants, Inc.

Revise as follows:

**SECTION 407
ELEVATORS**

407.4.7.1.2 Designation. Floors shall be designated . . . -4, -3, -2, -1, 0, 1, 2, 3, 4, etcetera, with floors below the main entry floor designated with minus numbers. Numbers shall be permitted to be omitted, provided the remaining numbers are in sequence. Where a telephone keypad arrangement is used, the number key (“#”) shall be utilized to enter the minus symbol (“-”). Ancillary letters shall be permitted to be used in conjunction with the numbers, provided the letters are located to the right of the numbers and not more than two letters are used for each floor designation. The font style for letters and number shall be consistent and the same as that used for hoistway markings complying with Section 407.2.3.1.

**REASON:** A key factor in any type of reading is anticipation and the reduction of conflicting messages. Therefore, the font style used should be consistent for use with the elevator. That way reading the tactile characters inside the car is not different from that of the hoistway markings.

Committee Action: 25-0-1 Disapproved

**REPORT OF HEARING:**
Modification (if any):
Committee Reason: This proposal was disapproved because the font style is already addressed in other sections of the code.
04-31 – 2021 Public Comment 1

407.4.7.1.2

Proponent: Gene Boecker, CCI

Further revise as follows:

SECTION 407
ELEVATORS

407.4.7.1.2 Designation. Floors shall be designated . . . -4, -3, -2, -1, 0, 1, 2, 3, 4, etcetera, with floors below the main entry floor designated with minus numbers. Numbers shall be permitted to be omitted, provided the remaining numbers are in sequence. Where a telephone keypad arrangement is used, the number key ("#") shall be utilized to enter the minus symbol ("-"). Ancillary letters shall be permitted to be used in conjunction with the numbers, provided the letters are located to the right of the numbers and not more than two letters are used for each floor designation. The font style for letters and number shall be consistent and the same as that used for hoistway markings complying with Section 407.2.3.1 comply with the requirements in Section 703.2.

---

REASON: The committee did not see the need for the same font inside and outside the elevator but did prefer to make sure the elevator numbers complied with the requirements for visual characters. Section 407.4.7.1.3 already requires the numbers to be tactile and be accompanied with braille. Therefore, it is only necessary to refer to Section 703.2 since the requirements of 703.3 are already included. This would assure that the numbers are capable of being read. It accomplishes the intent of the original proposal in that the idea was to have a font that was readable. This modification captures that concept and meets the desires of the committee.

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Committee Action Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-31 Boecker.doc

Committee Action for First Ballot:
REPORT OF HEARING:

Modification (if any):

Committee Reason:

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REPORT OF HEARING:
Modification (if any):
Committee Reason: This proposal was disapproved because the font style is already addressed in other sections of the code.

BALLOT COMMENT - FIRST DRAFT:
Proponent:
Desired Action:
Modification:
Reason:

Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:

REPORT OF HEARING - FIRST DRAFT
Committee Reason:

BALLOT COMMENT - SECOND DRAFT:
Proponent:
Desired Action:
Modification:
Reason:

Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:

FINAL ACTION:
Modification (if any):
Committee Reason:
04-33 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

04-33 – 2021

407.4.10.1, 407.4.10.3, 407.4.10.4(New), 407.4.10.4.1(New), 407.4.10.4.2(New)

**Proponent:** Kevin Brinkman, National Elevator Industry, Inc. (NEII)

**Revise as follows:**

SECTION 407

ELEVATORS

407.4.10 Emergency communications. Emergency two-way communication systems between an elevator car and a point outside the hoistway shall comply with Section 407.4.10 and ASME A17.1/CSA B44 listed in Section 106.2.8.

**407.4.10.1 Height.** The highest operable part of a two-way communication system shall comply with Section 308. Operable parts of the communication system shall be located between 30 inches (760 mm) and 48 inches (1,220 mm) above the floor.

**407.4.10.2 Identification.** Raised characters and braille complying with Sections 703.3 and 703.4 and raised symbols complying with Section 407.4.7.1.4 shall be provided adjacent to the device.

**407.4.10.3 Instructions.** Where instructions for use are provided, essential information instructions shall be presented in visual form, raised characters and braille complying with Sections 703.2, 703.3 and 703.4.

**407.4.10.4 Message Display Screen.**
407.4.10.4.1 Visibility. The display screen shall be visible from a point located 40 inches (1015 mm) above the center of the clear floor space, 24 inches (610 mm) immediately in front of the car operating panel.

407.4.10.4.2 Characters. Characters displayed on the screen shall be in a conventional form. Characters shall not be italic, oblique, script, highly decorative or other unusual forms. The uppercase letter "I" shall be used to determine the allowable height of all characters of the font. The uppercase letter "I" of the font shall be 3/16 inch (4.8 mm) minimum in height. Characters shall contrast with their background with either light characters on a dark background, or dark characters on a light background.

REASON: The reference to Section 308 would require the operable parts to be located 48 inches maximum and 15 inches minimum above the floor. The lower limit of 15 inches was necessary for older elevators that used a traditional phone handset with a cord because a phone box needed to be located below the car operating panel. Modern phone systems use a single push button which can be easily located in or near the car operating panel. The 30-inch dimension was chosen to allow the phone button to be located directly below the car operating panel.

ASME A17.1-2019/CSA B44:19 requires an in-car message display to be used by an elevator occupant who may not be able to communicate audibly to emergency personnel. The visibility of the display is to accommodate a wheelchair user through a standing adult, modeled after 707.7.1 for automatic teller machines and fare machines. The font style is the style required for general visual characters in section 703.2.3 and the font size is the size required for the displays used on automatic teller machines and fare machines in section 707.7.2.

The term “two-way” is removed from the requirement because it is included in the referenced requirements in ASME A17.1/CSA B44 and some communication components may not provide effective two-way communications between every passenger and every responder. Some passengers may only communicate verbally while others may only communicate visually therefore it is the collection of all communication components, audible and visual that provides the total communication functionality.

The word ‘information” was changed to “instructions” to align with the title and contents of the requirement.

04-33 – 2021 Modification
407.4.10.1, 407.4.10.3, 407.4.10.4(New), 407.4.10.4.1(New), 407.4.10.4.2(New)

Proponent: Kevin Brinkman, National Elevator Industry, Inc. (NEII)

Further modify as follows:

407.4.10.1 Height. Operable parts of the communication system shall be located between 30 inches (760 mm) minimum and 48 inches (1220 mm) maximum above the floor.
**Reason:** Editorial. To clarify that 30 and 48 inches are part of the range.

---

Staff Note: Question Divided.

Committee Action: Part 1 - Section 407.4.10 – remove “two-way” AS 4-18-3; D 21-3-1  
Part 2 - Remainder of proposal – AS 22-0-3 with editorial modification

**REPORT OF HEARING:**  
Modification (if any):

**Further modify as follows:**

**407.4.10 Emergency communications.** Emergency two-way communication systems between an elevator car and a point outside the hoistway shall comply with Section 407.4.10 and ASME A17.1/CSA B44 listed in Section 106.2.8.

**407.4.10.1 Height.** Operable parts of the communication system shall be located between 30 inches (760 mm) minimum and 48 inches (1 220 mm) maximum above the floor.

**Committee Reason:** The term “two-way” was reinserted in Section 407.4.10 because the committee felt that since this is included in ASME A17.1 it would not be a conflict and would make the overall intent of the section clearer. The modification to Section 407.4.10.1 is editorial. The change to Section 407.4.10.1 improved the reach for the operable parts. The additional requirement for the display screen provided appropriate requirements for placement and the information on the screen.

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**04-33 – 2021 Ballot Comments**

| BALLOT COMMENT 1- FIRST DRAFT: |
| Proponent: Rex Pace representing HUD |
| Desired Action: Affirmative with comment |
| Modification: |
| Reason: Deferred to the view of those with expertise on this subject. |

| BALLOT COMMENT 2- FIRST DRAFT: |
| Proponent: Kim Paarlberg representing ICC |
| Desired Action: Negative with comment |
| Modification: See Ballot Comment 2 |

| BALLOT COMMENT 3- FIRST DRAFT: |
04-33 – 2021 Ballot Comment 2
407.4.10.4.1, 407.4.20.4.2

Proponent: Kimberly Paarlberg, ICC

Further modify the proposal as follows:

407.4.10.4 Message Display Screen.

407.4.10.4.1 Visibility. The display screen shall be visible from a point located 40\-43 inches (1015\-1092 mm) minimum and 54 inches (1372 mm) maximum above the center of the clear floor space, 15 inches (381 mm) minimum and 24 inches (610 mm) maximum immediately in front of the car operating panel.

407.4.10.4.2 Characters. Characters displayed on the screen shall comply with Section 703.2 for visual characters except that the minimum character height is 3/16 inches (4.8 mm) minimum be in a conventional form. Characters shall not be italic, oblique, script, highly decorative or other unusual forms. The uppercase letter "I" shall be used to determine the allowable height of all characters of the font. The uppercase letter "I" of the font shall be 3/16 inch (4.8 mm) minimum in height. Characters shall contrast with their background with either light characters on a dark background, or dark characters on a light background.

REASON: I support the concept of the change; however, the proposed text is matching the display screen on an automatic teller machine, which is set up for a person seated in a wheelchair. Since this screen is intended for persons with hearing impairments, this should be set up for a standing person as well – 40” seems too low. The clear floor space may be perpendicular to parallel, so 24” is not always the right distance away and is farther than someone would stand. The character information is addressed in visual requirements and does not need to be repeated. This will also address items not covered, such as stroke width, character and line spacing and character width.

Committee Action for Ballotn Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:
04-33 – 2021 Ballot Comment 3
407.4.10.4.1

Proponent: Ken Schoonover

Revise as follows:

407.4.10.4.2 Characters. Characters displayed on the screen shall be in a conventional form. Characters shall not be italic, oblique, script, highly decorative or other unusual forms. The uppercase letter "I" shall be used to determine the allowable height of all characters of the font. The uppercase letter "I" of the font shall be 3/16 inch (4.8 mm) minimum in height. Characters shall contrast with their background with either light characters on a dark background, or dark characters on a light background.

REASON: The provision is vague, subjective and unenforceable. If there are specific features that intended to be required or prohibited, they must be clearly identified and described.

Committee Action for Ballot Comment 3:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

04-33 – 2021 Public Comment 1
407.4.10.1

Proponent: Marsha Mazz, representing the Terminology Work Group

Further revise as follows:

SECTION 407
ELEVATORS

407.4 Elevator car requirements. Elevator cars shall comply with Section 407.4.

407.4.10 Emergency communications....
407.4.10.1 Height. Operable parts of the communication system shall be located within the applicable reach range and 30 inches (760 mm) minimum and 48 inches (1,220 mm) maximum above the floor.

REASON: This is part of the generic terminology proposal from the Terminology Work Group for building blocks. This public comment is submitted here because this is a new requirement related to reach ranges. Please see the full proposal for complete information.

The current references sometimes references Section 308 and sometimes not. The adjective varies from ‘at least one of’ or ‘specified’. The work group is suggesting ‘applicable’.

Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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REPORT OF HEARING:
Modification (if any):
Further modify as follows:

407.4.10 Emergency communications. Emergency two-way communication systems between an elevator car and a point outside the hoistway shall comply with Section 407.4.10 and ASME A17.1/CSA B44 listed in Section 106.2.8.

407.4.10.1 Height. Operable parts of the communication system shall be located between 30 inches (760 mm) minimum and 48 inches (1,220 mm) maximum above the floor.

Committee Reason: The term “two-way” was reinserted in Section 407.4.10 because the committee felt that since this is included in ASME A17.1 it would not be a conflict and would make the overall intent of the section clearer. The modification to Section 407.4.10.1 is editorial.

The change to Section 407.4.10.1 improved the reach for the operable parts. The additional requirement for the display screen provided appropriate requirements for placement and the information on the screen.

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Rex Pace representing HUD
Desired Action: Affirmative with comment
Modification:
REPORT OF HEARING – FIRST DRAFT

Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:

REPORT OF HEARING – SECOND DRAFT

Modification (if any):
Committee Reason:

Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:

FINAL ACTION:
Modification (if any):
Committee Reason:

BALLOT COMMENT 2 - FIRST DRAFT:
Proponent: Kim Paarlberg representing ICC
Desired Action: Negative with comment
Modification:
Further modify the proposal as follows:

Further modify the proposal as follows:

407.4.10.4 Message Display Screen.

407.4.10.4.1 Visibility. The display screen shall be visible from a point located 40.43 inches (1015.1092 mm) minimum and 54 inches (1372 mm) maximum above the center of the clear floor space, 18 inches (457 mm) minimum and 24 inches (610 mm) maximum immediately in front of the car operating panel.

407.4.10.4.2 Characters. Characters displayed on the screen shall comply with Section 703.2 for visual characters except that the minimum character height is 3/16 inches (4.8 mm) minimum, be in a conventional form. Characters shall not be italic, oblique, script, highly decorative or other unusual forms. The uppercase letter "I" shall be used to determine the allowable height of all characters of the font. The uppercase letter "I" of the font shall be 3/16 inch (4.8 mm) minimum in height. Characters shall contrast with their background with either light characters on a dark background, or dark characters on a light background.

Reason: I support the concept of the change; however, the proposed text is matching the display screen on an automatic teller machine, which is set up for a person seated in a wheelchair. Since this screen is intended for persons with hearing impairments, this should be set up for a standing person as well – 40” seems too low. The clear floor space may be perpendicular to parallel, so 24” is not always the right distance away and is farther than someone would stand. The character information is addressed in visual requirements and does not need to be repeated. This will also address items not covered, such as stroke width, character and line spacing and character width.

BALLOT COMMENT 3 - FIRST DRAFT:
Proponent: Ken Schoonover, Individual member
Desired Action: Affirmative with comment
Modification:
Delete the first sentence in 407.4.10.4.2, as follows:

Characters displayed on the screen shall be in a conventional form. Characters shall not be italic, … (remainder unchanged)

Reason: The provision is vague, subjective and unenforceable. If there are specific features that intended to be required or prohibited, they must be clearly identified and described.
CHAPTER 5
GENERAL SITE AND BUILDING ELEMENTS

05-04 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-04 – 2021
502.2

**Proponent:** Gina Hilberry, Cohen Hilberry Architects, representing United Cerebral Palsy

**Revise text as follows:**

SECTION 502
PARKING SPACES

502.2 **Vehicle space size.** Car parking spaces shall be 96 inches (2440 mm) minimum in width. Van parking spaces shall be 132 inches (3355 mm) minimum in width.

**Exception Exceptions:**

1. Where the adjacent access aisle is 96 inches (2440 mm) minimum in width, van parking spaces shall be 96 inches (2440 mm) minimum in width.

2. Where the vehicle space and access aisle that serve an Accessible, Type A or Type B unit is in a garage and enclosed by walls located at the sides of the space and aisle, the width of the combined vehicle space and access aisle shall be 170 inches (4318 mm). The garage door shall be at least 120 inches (3048 mm) wide. The vehicle space and access aisle are not required to have marking or signage.

**REASON:** This parking type is not addressed in the standard. The walls enclosing the parking space obstruct movement around the car and can make transfers difficult if the space is held at 13 feet in width. The Supplemental FAQ for the HUD Guidelines clarified the requirement that
these spaces be 14 feet 2 inches wide inside and the door must be 10 feet wide (Questions and Answers about the Fair Housing Accessibility Guidelines 24 CR Ch. I, June 28, 1994, Item 14 Parking Spaces and Garages, (d)).

Committee Action: 25-0-4 Disapproved

REPORT OF HEARING:
Modification (if any):

Committee Reason: The orientation of the garage door to the space and the access aisle is not indicated. To provide an accessible route from the space you could use a man door next to the garage door or into the unit. There is no technical justification for the HUD guidance for 14’-2” wide garages. The language needs to clarify what type of garage this is applicable too. Signage and marking exceptions for these spaces are already addressed in scoping.

502.2-HILBERRY.doc

05-04 – 2021 Ballot Comments

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<td><strong>Reason:</strong> There is a basis for HUD’s guidance but guidance by its very natural typically does not address all scenarios. In that respect, we do not agree with the committee’s collective reasoning. Note that for an accessible unit or unit required by HUD’s 504 regulations that a Type A unit would be consistent with, the space would have to meet parking space accessibility requirements.</td>
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Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:
**Reason:** There is a basis for HUD’s guidance but guidance by its very nature typically does not address all scenarios. In that respect, we do not agree with the committee’s collective reasoning. Note that for an accessible unit or unit required by HUD’s 504 regulations that a Type A unit would be consistent with, the space would have to meet parking space accessibility requirements.

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| Proponent: Rex Pace representing HUD |
| Desired Action: Affirmative with Comment |

| BALLOT COMMENT - SECOND DRAFT |
| Proponent: |
| Desired Action: |
| Modification (if any): |
| Committee Reason: |

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05-06 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-06 – 2021
502.9, 502.9.1, 502.9.1.1, 502.9.1.2, 502.9.2

Proponent: Marsha Mazz, representing United Spinal Association

Revise as follows:

**SECTION 502**
**PARKING SPACES**

502.9 **Parallel parking spaces.** On-street parallel parking spaces located in the public right-of-way shall comply with Section 502.9.1. On-street perpendicular or angled parking spaces shall comply with Section 502.9.2.

502.9.1 **Wide sidewalks.** Where the width of the adjacent sidewalk or available right-of-way exceeds 14 feet (4265 mm), an access aisle 60 inches (1525 mm) wide minimum shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route an accessible route. The access aisle shall comply with Section 502.4 and shall not encroach on vehicular travel lanes.

502.9.1.1 **Alterations.** In alterations where the street or sidewalk within the public right-of-way and adjacent to the parking spaces is not altered, an access aisle shall not be required provided the parking spaces are located at the end of the block face.

502.9.1.2 **Narrow sidewalks.** An access aisle is not required where the width of the adjacent sidewalk or the available right-of-way is less than or equal to 14 feet (4265 mm). Where an access aisle is not provided, the parking spaces shall be located at the end of the block face.

502.9.2 **Perpendicular or angled parking spaces.** Where perpendicular or angled parking is provided, an access aisle 96 inches (2440 mm) wide minimum shall be provided at street level the full length of the parking space and shall connect to a pedestrian access route an accessible
route. The access aisle shall comply with Section 502.4 and shall be marked so as to discourage parking in the access aisle. Two parking spaces are permitted to share a common access aisle.

**REASON:** This proposal addresses the fact that the criteria for on-street parking is taken from the Access Board’s proposed Public Rights-of-Way Accessibility Guidelines published in March 2011 and supplemented in February, 2013. **This is not a final rule. It is subject to change by the Access Board prior to being finalized.** Also, before it an become ADA Standards, it must be again proposed for adoption as enforceable ADA Standards by the Departments of Justice and Transportation. Given the time since the proposed rule was published, there also is a chance that the rule will not be finalized in the near future – particularly if the government’s administrative procedures require republication of the proposed rule by the Access Board – starting the whole process over again.

While further change by the federal government presents an obvious problem, incorporation of the proposed rule into the ICC A117.1 presents other challenges to harmonization with current ADA requirements.

First, several courts have found that only the enforceable DOJ regulations (i.e., the 2010 ADA Standards) apply to work in the public right-of-way. (See Kirola v. City and County of San Francisco, No. 14-17521 (9th Cir. 2017) at [https://law.justia.com/cases/federal/appellate-courts/ca9/14-17521/14-17521-2017-06-22.html](https://law.justia.com/cases/federal/appellate-courts/ca9/14-17521/14-17521-2017-06-22.html). This means that where these criteria fall below the requirements of the 2010 ADA Standards, their use puts the designer at risk of a lawsuit or other adverse action. The current A117.1 requirement falls below the enforceable ADA criteria in 3 significant ways:

1. The provision permits omission of the access aisle required by Section 502.3 of the 2010 ADA Standards under certain conditions (alterations and narrow sidewalks).
2. The provision requires connection to a “pedestrian access route” instead of an “accessible route”, violating the 2010 ADA Standards Section 502.3.
3. The provision allows use of the criteria developed by the Access Board to apply *only in the public right-of-way* to apply on a roadway within a site. Therefore, a designer can opt to locate required access parking on the roadway (provided this location is closer than the parking lot) and, in alterations or where the sidewalk is narrow, an access aisle would not be required. Additionally, the designer would be required to connect the space to a “pedestrian accessible route” instead of an accessible route.

One further complication: the ICC A117.1 does not have technical requirements or define the term “pedestrian access route” (PAR). Under the Access Board’s proposed rule, a PAR differs from an accessible route, most notably in that its slope is measured from the adjacent roadway and, not from sea level.

We believe these criteria were included in the standard prematurely and, if the changes suggested above do not meet with approval or raise other questions, we would agree to a modification of this proposal to delete this section in its entirety, particularly as we are aware that the ICC A117.1 is rarely referenced by the authorities controlling work in public rights-of-way.
Committee Action: 15-4-5  Approved as modified

REPORT OF HEARING:
Modification (if any): Mod carries 15-9-5

Further modify as follows:

502.9 Parallel parking spaces. On-street parallel parking spaces located in the public right-of-way shall comply with Section 502.9.1. On-street perpendicular or angled parking spaces shall comply with Section 502.9.2.

502.9.1.1 Alterations. In alterations where the street or sidewalk within the public right-of-way and adjacent to the parking spaces is not altered, an access aisle shall not be required provided the parking spaces are located at the end of the block face.

Committee Reason: The modification was approved as adding ‘public right of way’ would remove allowances/requirements for street parking on private roads in multi-building sites. Using the phrase ‘ac accessible route’ instead of ‘a pedestrian access route’ is more consistent with the terminology in ADA and the A117.1.

There is concern that PROWAG does not provide the same level of access for accessible parking that ADA currently requires. The ADA would require the accessible parking to be level and have an accessible route. The PROWAG content has not yet been approved or proposed to be added into ADA. Therefore this may cause DOT to say use the proposed PROWAG and DOJ saying it does not comply with ADA.

05-06 – 2021 Ballot Comments

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<td><strong>Desired Action:</strong> Negative with comment</td>
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<td><strong>Proponent:</strong> Marsha Mazz, United Spinal Association</td>
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<td><strong>Modification:</strong></td>
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<td><strong>Reason:</strong> The committee erred when it modified the proposal to remove references to on-street parking ‘in the public right-of-way’. The allowance for narrow sidewalks is taken from the Access Board’s proposed rule for Accessible Public Rights-of-Way. Under the ADA, the exception for narrow sidewalks will not apply. This modification will cause designers to inadvertently violate the ADA if they locate parking on streets that are not in the Public Right-of-Way, such as private streets in a residential development and on a campus.</td>
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05-06 – 2021 Ballot Comment 1
502.9.1.2

Proponent: Kimberly Paarlberg, ICC

Further modify the proposal as follows:

502.9.1.2 Narrow sidewalks. An access aisle is not required where the width of the adjacent sidewalk or the available right-of-way is less than or equal to 14 feet (4265 mm). Where an access aisle is not provided, the parking spaces shall be located at the end of the block face.

REASON: I find the revisions to 502.9.2.1 confusing and I believe goes against the intent of the allowance. This is supposed to be an exception for the access aisle where the sidewalk is less than 14’. To me a right-of-way is the street, which is what is left now. I believe the sidewalks needs to be put back in.

Committee Action for Ballot Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-06 – 2021 Public Comment 1
502.9

Proponent: Marsha Mazz, United Spinal Association

Further revise as follows:

502.9 On-street parking spaces. On-street parallel parking in the public right-of-way shall comply with Section 502.9.1. On-street perpendicular or angled parking shall comply with Section 502.9.2.

REASON: Applying the provisions of the Access Board’s NFPM on Public Rights of Way to all parallel on-street parking spaces will present a conflict with the requirements of the 2010 ADA Standards. The Board’s proposed rule clearly will not result in changes to the parking requirements for facilities where accessible parking is located on a “street” which is not in the
public right-of-way. The term “street” is undefined in the Standards, and could apply to a private road not in the public right-of-way in which case accessible parking located on that street would be subject to the 2010 ADA Standards, not the proposed guidelines for Accessible Public Rights-of-Way.

**Committee Action for Public Comment 1:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

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**Committee Action for First Ballot:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

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**REPORT OF HEARING:**

Modification (if any):

Further modify as follows:

- **502.9 Parallel parking spaces.** On-street parallel parking spaces located in the public right-of-way shall comply with Section 502.9.1. On-street perpendicular or angled parking spaces shall comply with Section 502.9.2.

- **502.9.1 Alterations.** In alterations where the street or sidewalk within the public right-of-way and adjacent to the parking spaces is not altered, an access aisle shall not be required provided the parking spaces are located at the end of the block face.

**Committee Reason:** The modification was approved as adding ‘public right of way’ would remove allowances/requirements for street parking on private roads in multi-building sites.

Using the phrase ‘ac accessible route’ instead of ‘a pedestrian access route’ is more consistent with the terminology in ADA and the A117.1. There is concern that PROWAG does not provide the same level of access for accessible parking that ADA currently requires. The ADA would require the accessible parking to be level and have route. The PROWAG content has not yet been approved or proposed to be added into ADA. Therefore this may cause DOT to say use the proposed PROWAG and DOJ saying it does not comply with ADA.

**BALLOT COMMENT**

**1st DRAFT:**

Proponent: Kim Paarlberg representing ICC

Desired Action: Negative with comment

**Modification:**

Further modify the proposal as follows:

- **502.9.1.2 Narrow sidewalks.** An access aisle is not required where the width of the adjacent sidewalk or the available right-of-way is less than or equal to 14 feet (4265 mm). Where an access aisle is not provided, the parking spaces shall be located at the end of the block face.

**Reason:** I find the revisions to 502.9.2.1 confusing and I believe goes against the intent of the allowance. This is supposed to be an exception for the access aisle where the sidewalk is less than 14’. To me a right-of-way is the street, which is what is left now. I believe the sidewalks needs to be put back in.
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05-08 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-08 – 2021

502.1, 502.11, 502.11.1, 502.11.2, 503(New), 503.1.4 (New)

**Proponent:** Kimberly Paarlberg, International Code Council

**Add text as follows:**

**SECTION 502**

**PARKING SPACES**

**502.1 General.** Car and van parking spaces in parking lots shall comply with Sections 502.2 through 502.8. Car and van parking spaces provided as part of on-street parking shall comply with Sections 502.9 and 502.10. Where an electrical vehicle charging station is provided at a parking space, it shall comply with Section 502.11.

**SECTION 503**

**ELECTRICAL VEHICLE CHARGING STATIONS**

**503.1 502.11 Electrical vehicle charging stations.** Where an electrical vehicle charging station serving a parking space or an accessible vehicle space, that electrical vehicle charging station shall comply with Section 502.11. Sections 503.1.1 through 503.1.3. The accessible vehicle space shall comply with Section 503.1.4.

**503.1.1 502.11.4 Operable parts.** Operable parts on the charging station intended for operation by the user, including card readers, shall comply with Section 309.
503.1.2 Accessible route. An accessible route shall be provided from the access aisle adjacent to the parking space to the clear floor space complying with Section 502.11.1 adjacent to the vehicle charging station. When the vehicle is being charged, the accessible route shall not be obstructed by the cable between the car and charging station.

503.1.3 Obstructions. Protection bollards, curbs or wheel stops shall be located so that they do not obstruct the clear floor space required by Section 502.11.1 or the accessible route required by Section 502.11.2.

503.1.4 Vehicle space size. Accessible vehicle spaces at electrical vehicle charging stations shall comply with the van space requirements in Sections 502.2 through 502.6.

REASON: The 2021 IBC includes provisions for electrical vehicle charging stations, however, they are not indicated as a parking spaces, but as a service. Therefore, this proposal moves the provisions in ICC A117.1 for electrical vehicle charging stations into it’s own section and out from within parking spaces consistency.

The IBC proposal, G121-18 was submitted by Dawn Anderson, Dan Buuck, David Collins, Marsha Mazz, and Dominic Marinelli. It is my understanding that this is based on the requirements currently being used in California. The 2021 IBC text follows this reason. While IBC Section 1107.2.2 does say the space should be sized as an van space, it does not provide the level of detail for marking, length, floor surface and vertical clearance that is found in the ICC A117.1. Since this is technical criteria, I am proposing to include this in the ICC A117.1 as a new Section 503.1.4 with the added criteria.

The current requirement in IBC do not require a sign making these electrical vehicle charging stations to be reserved, so I am not including Section 502.7.

SECTION 1107
MOTOR VEHICLE RELATED FACILITIES

1107.1 General. Electrical vehicle charging stations shall comply with Section 1107.2. Fuel-dispensing systems shall comply with Section 1107.3.

1107.2 Electrical vehicle charging stations. Electrical vehicle charging stations shall comply with Sections 1107.2.1 and 1107.2.2.
Exception: Electrical vehicle charging stations provided to serve Groups R-2, R-3 and R-4 occupancies are not required to comply with this section.
1107.2.1 Number of accessible vehicle spaces. Not less than 5% of vehicle spaces on the site served by electrical vehicle charging systems but, not fewer than one for each type of electric vehicle charging system shall be accessible.

1107.2.2 Vehicle space size. Accessible vehicle spaces shall comply with the requirements for a van accessible parking space that is 132 inches (3350 mm) minimum in width with an adjoining access aisle that is 60 inches (1525 mm) minimum in width.

1107.3 Fuel-dispensing systems. Fuel-dispensing systems shall be accessible.

Committee Action: 16-6-8 Approved as submitted.

REPORT OF HEARING:

Errata:

SECTION 503
ELECTRICAL VEHICLE CHARGING STATIONS

503.1 Electrical vehicle charging stations. Where an electrical vehicle charging station serves an accessible vehicle space, that electrical vehicle charging station shall comply with Sections 503.1.1 through 503.1.3. The accessible vehicle space shall comply with Section 503.1.4.

Modification (if any): None

Committee Reason: IBC scopes EV charging stations as a service. This would coordinate with A117.1 with the scoping terminology.

There was a suggestion to clarify which sizes for van spaces and the access aisle should be used since there are two choices in the A117.1 and the IBC requires the 132”/60” option.

05-08 – 2021 Public Comment 1
107.5, 503


Further revise as follows:

Definitions 107.5
Charging Station: One or more electrical vehicle (EV) chargers at a common location.

Vehicle Charging Space: A space to park a vehicle for charging.
SECTION 503
ELECTRICAL VEHICLE CHARGING STATIONS

503.1 Electrical vehicle charging stations. Where an electrical vehicle charging station serves an accessible vehicle charging space, that electrical vehicle charging station shall comply with Sections 503.1.1 through 503.1.3. The accessible vehicle charging space shall comply with Section 503.1.4.

503.1.1 Operable parts. Operable parts on the charging station intended for operation by the user, including card readers, shall comply with Section 309. Where numeric keys or display screens are provided, they shall comply with Section 707.5 through 707.10. If two-way communication is integrated in the charging station, they shall comply with Section 708.

503.1.2 Accessible route. An accessible route shall be provided from the access aisle adjacent to the parking vehicle charging space to the clear floor space required by Section 503.1.1 adjacent to the vehicle charging station. An accessible route shall be provided from the vehicle charging space to an accessible entrance for the associated building on the same site. When the vehicle is being charged, the accessible route shall not be obstructed by the cable between the car and charging station.

503.1.3 Obstructions. Protection bollards, curbs or wheel stops shall be located so that they do not obstruct the clear floor space required by Section 503.1.1 or the accessible route required by Section 503.1.2.

503.1.4 Vehicle charging space size. Accessible vehicle spaces at electrical vehicle charging stations shall comply with the van space requirements in Sections 502.2 through 502.6. The vehicle charging spaces shall comply with Section 503.1.4.

503.1.4.1 Vehicle charging space size. The vehicle charging spaces shall be 132 inches (3353 mm) minimum in width and 240 inches (6096 mm) minimum in length.

Figure 503.1.4.1

VEHICLE PARKING SPACE SIZE

503.1.4.2 Vehicle charging space marking. The vehicle charging spaces shall be marked to define the width and length. Where vehicle charging spaces are marked with lines, the width measurements of vehicle charging spaces and adjacent access aisles shall be made from the centerline of the markings.

Exceptions:
1. Where parking spaces or access aisles are not adjacent to another vehicle charging space or access aisle, measurements shall be permitted to include the full width of the line defining the vehicle charging space or access aisle.
2. Vehicle charging space in pull-through EV charging stations are not required to comply with this section.
503.1.4.3 Access aisle. The vehicle charging spaces shall have an adjacent access aisle complying with Section 503.1.4.3.

Exception: Where charging stations are provided for street parking, the access aisle for the vehicle charging space shall be permitted to comply with Section 502.9.

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**Figure 503.1.4.3**

VEHICLE CHARGING SPACE ACCESS AISLE

503.1.4.3.1 Location. Access aisles shall adjoin an accessible route. Two vehicle charging spaces shall be permitted to share a common access aisle. Access aisles shall not overlap with the vehicular way. The vehicle charging spaces shall be permitted to have access aisles placed on either side of the vehicle charging space.

503.1.4.3.2 Width. Access aisles serving the vehicle charging spaces shall be 60 inches (1525 mm) minimum in width.

503.1.4.3.3 Length. Access aisles shall extend the full length of the vehicle charging spaces they serve.

503.1.4.3.4 Marking. Access aisles shall be marked so as to discourage parking in them. Where access aisles are marked with lines, the width measurements of access aisles and adjacent vehicle charging spaces shall be made from the centerline of the markings.

Exception:
1. Where access aisles or vehicle charging spaces are not adjacent to another access aisle or vehicle charging space, measurements shall be permitted to include the full width of the line defining the access aisle or vehicle charging space.

2. Vehicle charging space in pull-through EV charging stations are not required to comply with this section.

503.1.4.4 Vertical clearance. A vertical clearance of 98 inches (2490 mm) minimum shall be provided at the following locations:

1. Vehicle charging spaces.
2. The access aisles serving the vehicle charging space.
3. The vehicular routes serving the On-street vehicle charging space.

503.1.4.5 Floor surfaces. Vehicle charging 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 vehicle charging spaces they serve.

503.1.5 Identification. Where vehicle charging spaces are identified by signs, the signs shall include “Accessible EV Charging - Use Last”. Signs shall be 60 inches (1525 mm) minimum above the floor of the vehicle charging space, measured to the bottom of the sign.

REASON: The Access Board has put out new guidelines for the size of the EV station. This proposal’s reference for size was based on information before this. This public comment is to coordinate the size in the recommendations.

There are a couple of important updates. The recommended size is wider however two spaces can share an access aisle. There is a length requirement. There are additional clarification for the access aisle on street parking and no marking at pull-thru stations. EV spaces have the same height requirement as van spaces.  
There was a clarification that an accessible route is required to the charger and the building entrance. There are recommendations for signage.

Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-08 – 2021 Public Comment 2
503.1.4
Proponent: Marsha Mazz, United Spinal Association

Further revise as follows:

SECTION 502
PARKING SPACES

503.1.4 Vehicle space size. Accessible vehicle spaces at electrical vehicle charging stations shall comply with the van space requirements in Sections 502.2 through 502.6 and be 132 inches (3350 mm) minimum in width with an adjoining access aisle that is 60 inches (1525 mm) minimum in width.

---

REASON: The added qualification is taken directly from the original proposal to the IBC 2021. As one of the proponents, we wanted to be clear regarding the configuration of the van space, not permitting the option in the Standard to provide an 8-foot-wide parking space with an 8-foot-wide access aisle. The 132-inch-wide space allows wheelchair users more room around the vehicle within the space so that they can access the charging port regardless of its location. By not including the technical criteria in the Standard, the space could be configured in violation of the IBC. A proposal to remove the technical criteria from future editions of the IBC and to leave only the scoping, now that the requirements are in the Standard would make sense.

---

Committee Action for Public Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:
**Committee decision: AS**  |  **Committee Vote at Meeting: 16-6-8**  |  **Committee Vote on Ballot: 40-0-1**
---|---|---
**REPORT OF HEARING:**
Modification (if any):
Committee Reason: IBC scopes EV charging stations as a service. This would coordinate with A117.1 with the scoping terminology. There was a suggestion to clarify which sizes for van spaces and the access aisle should be used since there are two choices in the A117.1 and the IBC requires the 132"/60" option.

**BALLOT COMMENT - FIRST DRAFT:**
Proponent:
Desired Action:
Modification:
Reason:
Committee decision: AS/AM/D  |  **Committee Vote at Meeting:**  |  **Committee Vote on Ballot:**
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**REPORT OF HEARING - FIRST DRAFT**
Committee Reason:

**BALLOT COMMENT - SECOND DRAFT:**
Proponent:
Desired Action:
Modification:
Reason:
Committee decision: AS/AM/D  |  **Committee Vote at Meeting:**  |  **Committee Vote on Ballot:**
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**FINAL ACTION:**
Modification (if any):
Committee Reason:
05-10 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-10 – 2021
106.2.3(New), 504 (All)

**Proponent:** Kimberly Paarlberg, International Code Council

Revise text as follows:

SECTION 504
STAIRWAYS

504.1 General. Accessible stairs shall comply with Section 504.

504.2 Stairway width. The minimum stairway width shall comply with Section 1011.2 of the International Building Code listed in Section 106.2.3.

504.3 Stairway landings. Stairway landings shall comply with Section 1011.6 of the International Building Code listed in Section 106.2.3.

504.4 Headroom. The headroom clearance along the stairway shall be in accordance with Section 1011.3 of the International Building Code listed in Section 106.2.3.

504.5 504.2 Treads and risers. All steps on a flight of stairs shall have uniform riser height and uniform tread depth. Risers shall be 4 inches (100 mm) minimum and 7 inches (180 mm) maximum in height. Treads shall be 11 inches (280 mm) minimum in depth.

504.6 504.3 Open risers. Open risers shall not be permitted.
504.7 504.4 **Tread surface.** Stair treads shall comply with Section 302 and shall have a slope not steeper than 1:48.

504.7 **Dimensional uniformity.** The stair tread and risers shall be of uniform size and shape. The tolerances between largest and smallest shall be in accordance with Section 1011.5.4 and 1011.5.4.1 of the International Building Code listed in Section 106.2.3.

504.8 504.5 **Nosings.** Nosings shall comply with the following:

1. Nosings within a stairway shall be uniform.
2. If rounded, the radius of curvature at the leading edge of the tread shall be 1/2 inch (13 mm) maximum.
3. If beveled, the bevel at the leading edge shall slope at 45 degrees to the plane of the top surface of the tread and landing and extend for a horizontal distance of 1/2 inch (13 mm) maximum.
4. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled.
5. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical.
6. The permitted projection of the nosing shall be 11/2 inches (38 mm) maximum over the tread or floor below.

504.9 504.6 **Visual contrast.** Visual contrast shall comply with either 1 or 2:

1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing, shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.
2. Durable distinctive warning markings required by the adopted building code or ANSI safety standard.

504.10 504.7 **Handrails.** Stairs shall have handrails complying with Section 505.

504.11 504.8 **Wet conditions.** Stair treads and landings subject to wet conditions shall be designed to prevent the accumulation of water.

504.12 **Curved stairways.** Curved stairways shall comply with Section 1011.9 of the International Building Code listed in Section 106.2.3.

504.13 **Spiral stairways.** Spiral stairways shall comply with Section 1011.9 of the International Building Code listed in Section 106.2.3.

504.14 504.9 **Lighting.** Lighting for interior stairways shall comply with Section 504.9.

504.14.1 504.9.1 **Illumination level.** Lighting facilities shall be capable of providing illuminance of stairs measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings as follows:
1. A 1-foot-candle (10.8 lux) minimum illumination at times other than conditions of stair use.
2. A 10-foot-candle (108 lux) minimum illumination during conditions of stair use.
3. The transition from 1 foot candle (10.8 lux) to 10 foot candle (108 lux) under conditions of stair use shall be permitted to be achieved by automatic, motion sensor-type lighting switches provided the switch controllers comply with all of the following:
   3.1 The switch controllers are equipped for fail-safe operation and evaluated for this purpose.
   3.2 The motion sensor is activated by occupant movement on the stair or stair landings.
   3.3 The illumination timers are set for a minimum 15-minute duration.

**504.14.2 504.9.2 Lighting controls.** If provided, occupancy-sensing automatic controls shall activate the stairway lighting so the illuminance level required by Section 504.9.1 is provided on the entrance landing, each stair flight adjacent to the entrance landing, and on the landings above and below the entrance landing prior to any step being used.

**504.15 504.10 Tactile signage within the stairway enclosure.** Stair level identification signs in raised characters and braille complying with Sections 703.3 and 703.4 shall be located at each floor level landing in all enclosed stairways connecting more than three stories. Such sign shall be located adjacent to the door leading from the stairwell into the corridor to identify the floor level. The exit door discharging to the outside or to the level of exit discharge shall have a sign with raised characters and braille stating “EXIT.”

**504.11 Tactile signage at exits.** A sign stating EXIT in raised characters and Braille and complying with Sections 703.3 and 703.4 shall be provided adjacent to each door to an area of refuge providing direct access to a stairway, an exterior area for assisted rescue, an exit stairway, an exit ramp, an exit passageway and the exit discharge.

**SECTION 106**

**REFERENCED DOCUMENTS**


**REASON:** The IBC contains provisions for stairways that deal with the use of stairways by person with mobility and vision impairments that are not currently in the ICC A117.1. While the IBC does not scope the ICC A117.1 for stairways the A117.1 committee has stated that they would like this standard to be adoptable by any code. I am not proposing adding the text to the ICC A117.1 because I do not want conflicts over time.

Proposed Section 504.2 and 504.3 provide criteria for minimum widths to allow for save evacuation, but also address the width needed for the use of evacuation chairs and fire department carries during emergencies. Proposed 504.4 has minimum headroom, which is consistent with protruding object criteria. Proposed 504.7 for dimensional uniformity is an
important factor for reducing falls since a stairway studies have shown your gait is established in just two steps — this is especially important for persons with stability or balance issues. Proposed Section 504.12 and 504.13 address two types of stairways, curved and spiral, that are extremely common in buildings. The IBC includes important tread and riser information that is not in the ICC A117.1.

The change to proposed 504.15 is addressing a current conflict with the IBC. Stairway information signage is only required where the interior exit stairway connect more than three stories.

**Staff note:** The 2021 *International Building Code* can be viewed on the ICC website at [https://codes.iccsafe.org/content/IBC2021P2](https://codes.iccsafe.org/content/IBC2021P2).

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**05-10 – 2021 Modification**

106.2.5(New), 504 (All)

**Proponent:** Sharon Toji, representing Communications Task Group

Further revise text as follows:

**504.15 Tactile signage within the stairway enclosure.** Stair level identification signs in raised characters and braille complying with Sections 703.3 and 703.4 shall be located at each floor level landing in all enclosed stairways connecting more than three stories. Such sign shall be located adjacent to the door leading from the stairwell into the corridor to identify the floor level. The exit door discharging to the outside or to the level of exit discharge shall have a sign with raised characters and braille stating “EXIT.”

**Reason:** The original proposal would eliminate the requirement for signs on stairs to be accessible if the stair connects 3 stories or less. The proponent’s reason statement justifies this action on the basis that floor level identification 05-10-2021 signs are not required by the IBC on such stairways. While it is true that IBC Section 1023.9 does not require signs on these shorter stairways, it also does not prohibit them. If a designer elects to provide such signs, another Section, IBC 1023.11, would require them to be accessible because this provision applies where such signs are “provided”, not where they are “required”. Consequently, there is no conflict. Additionally, if this modification fails, this proposal will conflict with the DOJ ADA Standards Section 216.2 and 216.4.1.

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Committee Action: 14-14-4 Chair votes to approve As Modified

**REPORT OF HEARING:**

**Modification (if any):** 23-2-6 Mod approved

Further revise text as follows:
504.15 **Tactile signage within the stairway enclosure.** Stair level identification signs in raised characters and braille complying with Sections 703.3 and 703.4 shall be located at each floor level landing in all enclosed stairways connecting more than three stories. Such sign shall be located adjacent to the door leading from the stairwell into the corridor to identify the floor level. The exit door discharging to the outside or to the level of exit discharge shall have a sign with raised characters and braille stating “EXIT.”

**Committee Reason:** The purpose of the modification was so that stair level identification signage would be provided in any height building. The provisions will provide a complete package of stairway requirements for persons with mobility and vision disabilities. Some of the important safety issues associated with stairways are not currently included in the ICC A117.1.

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### 05-10 – 2021 Ballot Comments

#### BALLOT COMMENT 1- FIRST DRAFT:

**Proponent:** Dan Buuck representing NAHB  
**Desired Action:** Affirmative with comment  
**Modification:**

**Reason:** Referencing specific sections in the IBC, especially subsections, can be risky, since those references can easily be broken when the section numbers change. This is especially true for A117.1 which is not in a parallel development cycle with the other I-Codes. Is there another way to reference the provisions in the IBC?

#### BALLOT COMMENT 2- FIRST DRAFT:

**Proponent:** Kim Paarlberg representing ICC  
**Desired Action:** Affirmative with comment  
**Modification:**

**Reason:** If the standard wants to include stairways, it needs to address the allowances for all types of stairways. These elements are necessary for persons with mobility and visual impairments.

### 05-10 – 2021 Public Comment 1

505.4

**Proponent:** Marsha Mazz, United Spinal Association

**Further revise as follows:**

SECTION 504  
STAIRWAYS
505.4 Headroom. The headroom clearance circulation path along the stairway shall conform in accordance with Section 1011.3 of the International Building Code listed in Section 106.2.5 comply with Section 307.

**REASON:** ICC A117.1 prohibits “protruding objects” on all circulation paths, including stairs and landings. The Standard ensures that headroom is adequate and prohibits objects from protruding into the width of circulation paths. The current requirements of the Standard better protect persons with vision impairments because they are not limited to headroom and they address the entire circulation path. The referenced section of the IBC seems to only govern “headroom” and not to extend coverage to the entire circulation path. We see so many protruding objects in stairways that we believe either the text of the IBC is inadequate or it is consistently misinterpreted.

Committee Action Public Comment 1:

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

05-10 – 2021 Public Comment 2

107.5

**Proponent:** David Cooper, Stair Design and Manufacturing Consultants

**Further revise as follows:**

**SECTION 107**

**DEFINITIONS**

107.5 Defined terms.

**landing:** A horizontal walking surface providing the minimum area to access or depart from, an adjacent stair, flight of stairs, ramp run, or elevator.

**REASON:** This definition for landing is not in the IBC and has been submitted in a separate public comment by the proponent for that reason. This definition or its modification as approved
by the A117.1 committee will be submitted by the SMA for inclusion in the 2027 IBC to provide correlation.

This term is used throughout the standard as it relates to the required sizes of walking surfaces where stairs, flights of stairs, ramp runs, and elevators connect at each adjoining floor level or intermediate level between floors of each story. This definition provides a clear understanding of the requirements of this standard. It is the intent of the Terminology task group to review this proposal prior to the committee review.

Committee Action for Public Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-10 – 2021 Public Comment 3

107.5

Proponent: David Cooper, Stair Design and Manufacturing Consultants

Further revise as follows:

SECTION 107
DEFINITIONS

107.5 Defined terms.

flight: A continuous run of rectangular treads, winders, or combination thereof from one landing to another.

handrail: A horizontal or sloping rail intended for grasping by the hand for guidance or support.

nosing: The leading edge of treads of stairs and of landings at the top of stairway flights.

stair: A change in elevation, consisting of one or more risers.

stairway: One or more flights of stairs, either exterior or interior, with the necessary landings and platforms connecting them, to form a continuous and uninterrupted passage from one level to another.

spiral stairway: A stairway having a closed circular form in its plan view with uniform section-shaped treads attached to and radiating from a minimum-diameter supporting column.
**winder:** A tread with nonparallel edges.

**REASON:** The terms stair, stairway, and flight are understood to have similar context but clearly are intended to have different meanings. These terms and others related to stairs are defined in the building codes.

This modification provides the definitions of terms relevant to this proposal as they are defined in the IBC. They are essential to a clear understanding of the requirements of this standard.

Please note that IBC definition of “Ramp” is already a defined term in the A117.1 standard. The use of terms as defined in the IBC is rudimentary to correlation of the standard with the building codes.

It is the intent of the Terminology task group to review these terms prior to the committee review.

We request approval as further modified by this public comment.

**Committee Action for Public Comment 3:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

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**Committee Action for First Ballot:**

**REPORT OF HEARING:**

Modification (if any):

Committee Reason:

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<td>REPORT OF HEARING: Modification (if any): Further revise text as follows: 504.15 Tactile signage within the stairway enclosure. Stair level identification signs in raised characters and braille complying with Sections 703.3 and 703.4 shall be located at each floor level landing in all enclosed stairways connecting more than three stories. Such sign shall be located adjacent to the door leading from the stairwell into the corridor to identify the floor level. The exit door discharging to the outside or to the level of exit discharge shall have a sign with raised characters and braille stating “EXIT.” The provisions will provide a complete package of stairway requirements for persons with mobility and vision disabilities. Some of the important safety issues associated with stairways are not currently included in the ICC A117.1.</td>
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Report for 05-10–2021

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Dan Buuck representing NAHB
Desired Action: Affirmative with comment
Modification:
Reason: Referencing specific sections in the IBC, especially subsections, can be risky, since those references can easily be broken when the section numbers change. This is especially true for A117.1 which is not in a parallel development cycle with the other I-Codes. Is there another way to reference the provisions in the IBC?

BALLOT COMMENT 2- FIRST DRAFT:
Proponent: Kim Paarlberg representing ICC
Desired Action: Affirmative with comment
Modification:
Reason: If the standard wants to include stairways, it needs to address the allowances for all types of stairways. These elements are necessary for persons with mobility and visual impairments.

Report of Hearing – First Draft

Modification (if any):
Committee Reason:

BALLOT COMMENT - SECOND DRAFT:
Proponent:
Desired Action:
Modification:
Reason:
Committee decision: AS/AM/D
Committee Vote at Meeting:
Committee Vote on Ballot:

Final Action:
Modification (if any):
Committee Reason:
05-11 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-11 – 2021
504.6

**Proponent:** Billie Louise (Beezy) Bentzen, PhD., Accessible Design for the Blind, representing Association for the Education and Rehabilitation of the Blind and Visually Impaired (AER)

**Revise as follows:**

**SECTION 504**
**STAIRWAYS**

504.6 **Visual contrast.** Visual contrast shall comply with either 1 or 2:

1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing, shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The width of the visual contrast shall be consistent for the run of the stairway. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.

2. Durable distinctive warning markings required by the adopted building code or ANSI safety standard.

**REASON:** Consistency in markings is important to the safety of vision disabled persons. It is my understanding that the optimal dimension is 2 inches.

Committee Action: 20-4-2 Disapproved

**REPORT OF HEARING:**
**Modification (if any):**
Committee Reason: This proposal was disapproved because the language was unclear as to if this requirement was for the width of the stripe or the width of the stairway. There was the question as to if this would apply to a stair run, the flight between stories or the entire run of the stairway.

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<td>Desired Action: Negative with comment</td>
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<td>Modification: See Ballot Comment 1</td>
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05-11 – 2021 Ballot Comment 1

504.6

Proponent: Hope Reed and Stan Ross representing NMGCD

Further revise as follows:

504.6 Visual contrast. Visual contrast shall comply with either 1 or 2:
   1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing, shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The contrasting marking shall be a consistent width, durable and shall extend from one side of each tread to the other side of each tread.
   2. Durable distinctive warning markings required by the adopted building code or ANSI safety standard.

REASON: Maintaining consistency in visual aids has been upheld for other items in A117.1, such as the International Symbols in Section 703.6. People with disabilities move slowly on the steps. The visual contrast is helpful for people to see exactly where their foot is positioned. People with disabilities may check each step to observe if their foot is straight, if the ankle bent or twisted, and if the foot is too far back or too far forward to easily and safely make the next step. Steps are a serious endeavor for people with limited strength, balance and vision impairments.

Committee Action for Ballot Comment 1:

REPORT OF HEARING:
Modification (if any):

Committee Reason:

05-11 – 2021 Public Comment 1
504.6

Proponent: David Cooper, Stair Design and Manufacturing Consultants; Sharon Toji, Access Communications, representing Communications Task Group.

Further revise as follows:

SECTION 504
STAIRWAYS

504.6 Visual contrast **marking**. Visual contrast **markings** shall comply with either 1 or 2:

1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing, shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The width of the visual contrast marking shall be **uniform at each tread and landing consistent for the run of the stairway**. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.

2. **Durable distinctive** Distinctive warning markings and **photoluminescent markings as approved** required by the adopted building code or ANSI safety standard the authority having jurisdiction.

REASON:

Cooper: A requirement for uniformity of contrast markings will allow improved visual perception, improved safety and is consistent with the requirements for uniform treads, nosings, and risers. Adding “marking” to the text of the requirement resolves the committee’s concern to identify the object width being controlled, by clearly stating “… the visual contrast marking…”.

Although titles are editorial, the word “marking” has been added to the title as well as to the charging statement to further clarify.

The original intent was to assure uniformity of the marking width throughout the stairway. The reference to the “run of the stairway” was considered confusing and has been replaced with “each tread and landing of the stairway”. The IBC definition of a stairway will be recommended for adoption by the A117.1 Terminology Task Group. A stairway includes every flight of treads and each landing from one level to another:

“One or more flights of stairs, either exterior or interior, with the necessary landings and platforms connecting them, to form a continuous and uninterrupted passage from one level to another.”
Use of the defined term stairway with reference to the specific components, “every tread and landing” requiring contrast markings clarifies and resolves the concerns reasoned for disapproval.

The term “uniform” is substituted for “consistent” as “uniform” is used in the standard in other requirements related to the size of treads, nosings and risers.

The term “durable” has been deleted as subjective and not enforceable.

Photoluminescent markings may not be interpreted as “distinctive warning markings” and have been added to prevent potential conflict with contrast markings.

Finally, the substitution of “as approved by the authority having jurisdiction” is consistent with similar changes throughout the standard is likely editorial.

Approval as modified is requested.

Toji: This is the work of the Stair Contrast Sub-Group of the Communications Task Group. Substantial advice from a participating expert who is researching stair safety has convinced me and other Task Group members that, in conjunction with agreement on a useable definition for “light” and “dark” that can be used to choose marking materials that have sufficient contrast with the stair tread coverings, this proposed wording will assist in providing additional safety for those with vision impairments who use stairs, including those in the aging population. Approval as modified is requested.

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Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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Report for 05-11–2021

| Committee decision: D | Committee Vote at Meeting: 20-4-2 | Committee Vote on Ballot: 39-1-1 | Report for 05-11-2021
|-----------------------|-----------------------------------|---------------------------------|------------------
| BALLOT COMMENT 1-FIRST DRAFT | | | 05-11 Cooper.doc

Committee Reason: This proposal was disapproved because the language was unclear as to if this requirement was for the width of the stripe or the width of the stairway. There was the question as to if this would apply to a stair run, the flight between stories or the entire run of the stairway.

----

Proponent: Hope Reed and Stan Ross representing NMGCD
Report for 05-11– 2021

<table>
<thead>
<tr>
<th>Desired Action: Negative with comment</th>
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<tbody>
<tr>
<td>Modification:</td>
</tr>
<tr>
<td>504.6 Visual contrast. Visual contrast shall comply with either 1 or 2:</td>
</tr>
<tr>
<td>1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing, shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The contrasting marking shall be a consistent width, durable and shall extend from one side of each tread to the other side of each tread.</td>
</tr>
<tr>
<td>2. Durable distinctive warning markings required by the adopted building code or ANSI safety standard.</td>
</tr>
</tbody>
</table>

*Reason:* Maintaining consistency in visual aids has been upheld for other items in A117.1, such as the International Symbols in Section 703.6. People with disabilities move slowly on the steps. The visual contrast is helpful for people to see exactly where their foot is positioned. People with disabilities may check each step to observe if their foot is straight, if the ankle bent or twisted, and if the foot is too far back or too far forward to easily and safely make the next step. Steps are a serious endeavor for people with limited strength, balance and vision impairments.

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<tr>
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<td>Committee Vote on Ballot:</td>
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**REPORT OF HEARING – FIRST DRAFT**

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**BALLOT COMMENT– SECOND DRAFT:**

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**FINAL ACTION:**

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05-12 – 2021 overview

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<th>Notes; Groups; groupings</th>
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<tr>
<td>05-12</td>
<td>Paarlberg</td>
<td>504.6</td>
<td>D 22-1-2</td>
<td>7-14-2022</td>
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<th>Notes; Groups; groupings</th>
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<td>PC2</td>
<td>Cooper</td>
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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-12 – 2021

504.6

**Proponent:** Kimberly Paarlberg, International Code Council

**Revise text as follows:**

**SECTION 504**

**STAIRWAYS**

**504.6 Visual contrast.** Visual contrast shall comply with either 1, 2 or 3:

1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing, shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.

2. The leading 1 to 2 inches (25 to 51 mm) in the direction of moving down the stairway, the landing edge and the last tread before the a landing or floor, measured horizontally from the leading edge of the nosing, shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.

3. Durable distinctive warning markings required by the adopted building code or ANSI safety standard.

**504.9 Lighting.** Lighting for interior stairways shall comply with Section 504.9.

**504.9.1 Illumination level.** Lighting facilities shall be capable of providing illuminance of stairs measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings as follows:

1. A 1-foot-candle (10.8 lux) minimum illumination at times other than conditions of stair use
2. A 10-foot-candle (108 lux) minimum illumination during conditions of stair use
3. The transition from 1 foot candle (10.8 lux) to 10 foot candle (108 lux) under conditions of stair use shall be permitted to be achieved by automatic, motion sensor-type lighting switches provided the switch controllers comply with all of the following:
   3.1 The switch controllers are equipped for fail-safe operation and evaluated for this purpose
   3.2 The motion sensor is activated by occupant movement on the stair or stair landings
   3.3 The illumination timers are set for a minimum 15-minute duration.

504.9.2 Lighting controls. If provided, occupancy-sensing automatic controls shall activate the stairway lighting so the illuminance level required by Section 504.9.1 is provided on the entrance landing, each stair flight adjacent to the entrance landing, and on the landings above and below the entrance landing prior to any step being used.

**REASON:** The intent of this proposal is to provide an alternative for marking stairways. Section 504.6 added an Item 2 to remove the conflict between the A117.1 stairway provisions and where stairways required warning markings are required in IBC. However, not all stairways are required to be marked in IBC. The A117.1 significantly improved the lighting on stairways. This is also in the 2021 IBC Section 1008.2.1. This was recommended as a means to notify visually impaired persons of the change in level to stairways. A stripe at each step is not needed since stairway safety studies indicate muscle memory put as person into a stairway gait in only two steps. See the examples for the new proposed Item 2 and the current Item 1.
Examples of stairway markings in new exception.

This seems to provide a clearer message than steps that could comply with the current exception 1.
Committee Action: 22-1-2 Disapproved

REPORT OF HEARING:
Modification (if any):

Committee Reason: The proposal was disapproved because the stairway striping is for persons with mobility impairments to be able to see each tread, as well as an indication of the stairway for the visually impaired.

05-12 – 2021 Public Comment 1
504.6

Proponent: David Cooper, Stair Design and Manufacturing Consultants

Further revise as follows:

SECTION 504
STAIRWAYS

504.6 Visual contrast marking. Visual contrast markings shall comply with either 1, 2, or 3:
1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing, shall consist of a solid color marking with having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.
2. The leading 1 to 2 inches (25 to 51 mm) in the direction of moving down the stairway, of the first tread of each flight and the landing at the top of each flight edge and the last tread before a landing or floor, measured horizontally from the leading edge of the nosing, shall consist of have a solid color marking with having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.

3. Durable distinctive warning markings and photoluminescent markings required by the adopted building code or ANSI safety standard as approved by the authority having jurisdiction.

504.9 Lighting. Lighting for interior stairways shall comply with Section 504.9.

504.9.1 Illumination level. Lighting facilities shall be capable of providing illuminance of stairs measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings as follows:

1. A 1-foot-candle (10.8 lux) minimum illumination at times other than conditions of stair use
2. A 10-foot-candle (108 lux) minimum illumination during conditions of stair use
3. The transition from 1 foot candle (10.8 lux) to 10 foot candle (108 lux) under conditions of stair use shall be permitted to be achieved by automatic, motion sensor-type lighting switches provided the switch controllers comply with all of the following:
   3.1 The switch controllers are equipped for fail-safe operation and evaluated for this purpose
   3.2 The motion sensor is activated by occupant movement on the stair or stair landings
   3.3 The illumination timers are set for a minimum 15-minute duration.

REASON: Both the sighted and blind often establish their gait at the start of each flight and then continue with little or no visual adjustment of their gait. Traversing a stair may is more complex for persons with low vision. For some, looking down to make interim adjustments of their gait affects their postural stability. In accordance with the original submission this proposal includes the option to mark only the first tread and top nosing of each flight to clearly indicate each end of a flight of stairs. Unlike the original proposal it calls out specific requirements for improved illumination (see table below) of the walking surfaces as well as contrasting riser and tread materials in lieu of what some consider a confusing array of stripes when every tread is marked. Marking only a portion of the nosings in a flight also helps to limit the user from confusing a warning marking as a contrast marking where warning stripes are used to mark non-uniform risers as required by the building codes.

The extensive literature review of the A117.1 Contrast subgroup of the Communications task group provided no definitive frequency, location, or size of contrast markings. Such research is being considered. The many technical papers and presentations reviewed stressed the importance of good lighting, cited the benefit of contrasting riser and tread materials and in general pointed to much research yet needed to determine how human vision perceives contrast
in a measurable context that can be codified. However, until we know more the additional option as modified by this proposal offers a reasoned alternative.

The table below provides recommended light levels from the IESNA Lighting Handbook. Please note that the recommended light levels correlate with the 10 FC requirement of the standard at stairs and corridors. Doubling the illumination level as stated in option 2 would provide lighting equivalent to that required in other spaces as highlighted in green below. Although a maximum level is not proposed the users transition from most areas in the built environment to the stairway will not represent a significant differential in light level that they are not accustomed to.

<table>
<thead>
<tr>
<th>ROOM TYPE</th>
<th>LIGHT LEVEL (FOOT CANDLES)</th>
<th>LIGHT LEVEL (LUX)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cafeteria - Eating</td>
<td>20-30 FC</td>
<td>200-300 lux</td>
</tr>
<tr>
<td>Classroom - General</td>
<td>30-50 FC</td>
<td>300-500 lux</td>
</tr>
<tr>
<td>Conference Room</td>
<td>30-50 FC</td>
<td>300-500 lux</td>
</tr>
<tr>
<td>Corridor - General</td>
<td>5-10 FC</td>
<td>50-100 lux</td>
</tr>
<tr>
<td>Corridor - Hospital</td>
<td>5-10 FC</td>
<td>50-100 lux</td>
</tr>
<tr>
<td>Dormitory - Living Quarters</td>
<td>20-30 FC</td>
<td>200-300 lux</td>
</tr>
<tr>
<td>Exhibit Space (Museum)</td>
<td>30-50 FC</td>
<td>300-500 lux</td>
</tr>
<tr>
<td>Gymnasium - Exercise / Workout</td>
<td>20-30 FC</td>
<td>200-300 lux</td>
</tr>
<tr>
<td>Gymnasium - Sports / Games</td>
<td>30-50 FC</td>
<td>300-500 lux</td>
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<tr>
<td>Kitchen / Food Prep</td>
<td>30-75 FC</td>
<td>300-750 lux</td>
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<tr>
<td>Laboratory (Classroom)</td>
<td>50-75 FC</td>
<td>500-750 lux</td>
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<tr>
<td>Laboratory (Professional)</td>
<td>75-120 FC</td>
<td>750-1200 lux</td>
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<td>Library - Stacks</td>
<td>20-50 FC</td>
<td>200-500 lux</td>
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<tr>
<td>Library - Reading / Studying</td>
<td>30-50 FC</td>
<td>300-500 lux</td>
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<tr>
<td>Loading Dock</td>
<td>10-30 FC</td>
<td>100-300 lux</td>
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<td>Lobby - Office/General</td>
<td>20-30 FC</td>
<td>200-300 lux</td>
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<tr>
<td>Locker Room</td>
<td>10-30 FC</td>
<td>100-300 lux</td>
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<tr>
<td>Lounge / Breakroom</td>
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<td>Mechanical / Electrical Room</td>
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<td>200-500 lux</td>
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<tr>
<td>Office - Open</td>
<td>30-50 FC</td>
<td>300-500 lux</td>
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<tr>
<td>Office - Private / Closed</td>
<td>30-50 FC</td>
<td>300-500 lux</td>
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<tr>
<td>Parking - Interior</td>
<td>5-10 FC</td>
<td>50-100 lux</td>
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<tr>
<td>Restroom / Toilet</td>
<td>10-30 FC</td>
<td>100-300 lux</td>
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<tr>
<td>ROOM TYPE</td>
<td>LIGHT LEVEL (FOOT CANDLES)</td>
<td>LIGHT LEVEL (LUX)</td>
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<td>Retail Sales</td>
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<td>Stairway</td>
<td>5-10 FC</td>
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<td>Storage Room - General</td>
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<tr>
<td>Workshop</td>
<td>30-75 FC</td>
<td>300-750 lux</td>
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Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-12 Cooper.doc

05-12 – 2021 Public Comment 2
504.6

Proponent: David Cooper, Stair Design and Manufacturing Consultants

Request Disapproval.

REASON: The Stair Contrast Task Group supports the committee’s action to disapprove 05-12. The proponent states that people coordinate their visual and motor assessment in the first few steps to establish a gait independent of visual assessment of each step. Although this is true for some, this is not true for persons with disabilities that approach the ascent or descent of a flight of stairs one step at a time. Often the demand of traversing a stairway requires midflight rests that are short of a landing and reassessment of the location of steps between landings. Contrast markings at each step and landing should be required. We support disapproval of the original proposal 05-12 as submitted.

Committee Action for Public Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:
Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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<td>Committee Reason: The proposal was disapproved because the stairway striping is for persons with mobility impairments to be able to see each tread, as well as an indication of the stairway for the visually impaired.</td>
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05-13 – 2021 overview

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<td>504.6.1(N ew)</td>
<td>D 25-0-1</td>
<td>2-2-2023</td>
<td>Communications - 01-05, 05-13, 07-08 and 07-19</td>
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BC= Ballot Comment, PC= Public comment, Bold Comment number is proposed revision below

05-13 – 2021
504.6.1(New)

Proponent: Sharon Toji, Access Communication

Revise text as follows:

SECTION 504
STAIRWAYS

504.6 Visual contrast. Visual contrast shall comply with either 1, or 2:

1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing, shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.

2. Durable distinctive warning markings required by the adopted building code or ANSI safety standard.

504.6.1 Contrast. The light reflectance value (LVR) of the light or dark marking stripe and its background shall differ by a minimum of 50 points of LRV.

REASON: The contrast of the striping on stairs, either indoor or outdoor, is absolutely vital not only to those with vision impairments throughout their lives, but to older people. Stairway accidents are the cause of many serious injuries, and not being able to see where the edge of tread is, is a major cause of those accidents. Too many times, we see stair striping that is just grooved lines — even though those are not allowed. We need as specific a standard as
possible for stair striping, so that inspectors have some criteria for refusing to grant occupancy when the stairs are dangerous.

It is possible to measure the light reflectance value of carpeting, and even of carpeting that is not completely solid in color. Manufacturers who sell carpeting, paint, or colored cement should also be able to provide accurate LRV numbers for their products.

I have been trying for some time to move to the simplicity of most of the European countries, and specifically Great Britain, by merely requiring a specific spread between the low LRV and high LRV numbers for the two adjacent colors that would also make sense if you used the Weber 70 percent formula. In my opinion, the British requirement of 70 points for signs is too high, and would be immediately rejected by even those designers who want to provide high contrast.

The extensive exploratory work done by a special committee at NIBS, the National Institute of Building Standards, on architectural standards to aid people with vision impairments who are not functionally blind includes a close look at standards throughout much of the world as well as research by several well known figures in the field. I was shown an early copy of the report, and made extensive comments to the committee. Many of my comments appear to be reflected in the final publication. Two members of our ANSI A117.1 Committee, Marsha Mazz and Eunice Noell-Waggoner, were members of the NIBS committee as well. I believe their recommendations are well supported by their research.

Their recommendation on contrast, which they do explain is still a work in progress as much more needs to be done to understand how people with such a huge variety and mixture of vision impairments can best access the built environment, is that all signs as well as stair striping use adjacent colors that have LRV differences of at least 50 points. In several instances, they also note the Weber 70 percent formula. I assume this may mean that as I formerly suggested, we start with an LRV for the light color, find the second color, and then apply the formula to determine if the contrast meets a minimum of 70 percent.

In this case, I started with a very dark swatch, with an LRV of 5, compared it with a swatch of 55 to get the 50 points difference, and then also applied the formula. At that end of the scale the percentage is about 90 percent. I moved upward 5 points at a time. Each move produced a lower percentage when the formula was applied. When I reached a lighter color with an LRV of 70, and compared it with a dark color with an LRV of 20, the contrast percentage was 71 percent. Although my conclusion is that it would be preferable at this point to apply the formula, they do not make that definite recommendation, and although I think it would be well founded, I have not done so either. Moving further up the scale into the lighter colors, and requiring a minimum 50 points of difference will not be ideal, but as a minimum, it is still preferable to many of the fashionable tone on tone signs I have seen lately, such as white letters on an ivory or pale beige background.

In further support, I think it is time for us to join the rest of the world. Virtually every country that has an extensive set of requirements for disabled access takes contrast seriously, and uses light reflectance values, or LRV, to measure adjoining colored surfaces for contrast. Some use
the Weber formula, but more use a formula referred to as the Michelson formula. All of them have struggled, I believe, with the same concerns we have, that it is almost impossible to carry out a large scale study because the range of vision and vision impairments is so complex. However, it is certainly true that many forms of vision impairment, from common forms of red/green color blindness or Deuteranopia which affects as many as 8 percent of males in our population to more complex conditions like glaucoma or macular degeneration include some degree of inability to distinguish colors. Therefore, the differences in light reflectance are crucial if signs are to be visually accessible. We have listened to experts in contrast, vision and color and heard a report and recommendation from a subcommittee on contrast that worked together for a year and also included several experts. We came close to passing a measurable standard three times. Once it failed by one vote when the Chair broke a tie. None of these efforts at creating a measurable standard was perfect, but neither are most of our other standards. Who is to say, for instance, that our standard for ramps is exactly what is needed for access by the majority of wheelchair users? Almost every successful standard is some sort of compromise that serves many people quite well, some people fairly well, and some people not at all.

Let us finally move forward to the next step, and add contrast to the many issues where we have a measurable standard, though those standards are not always perfect. That is why we return every several years for revisions. We will not ever be able to move forward on this issue unless we start somewhere. Once we have a standard, we may be able to get grant money and do some meaningful research on how adequate that standard is in providing access to persons with partial vision and a variety of vision impairments.

Here are documents and articles that document the use of LRV to measure contrast in support of disabled access from around the world. The NIBS report is included, which refers to much of that material. There is an extensive article that mentions some of our efforts here, but documents that we do not have a measurable standard. There are two articles in German, which I did read in the original. The Google translation will be accurate if you do not read German, but you will need to break up the articles into several parts. One of those articles is especially interested in contrast for stair striping due to the high percentage of accidents on stairs.

https://nullbarriere.de/din32975.htm
https://www.pro-retina.de/system/files/artikel/broschure_barrierefrei_2019ua_1_0.pdf

Committee Action: Disapproval 25-0-1

REPORT OF HEARING:

Modification (if any):
Committee Reason: The Communications task group needs additional time for development of LRV requirements.

05-13 – 2021 Ballot Comments

BALLOT COMMENT 1- FIRST DRAFT:
Proponent: Sharon Toji, Hearing Loss Association of America
Desired Action: Negative with comment
Modification:
Reason: Proposed modification due to the work of the Stair Contrast Sub Group of the Communication Task Group.

BALLOT COMMENT 2- FIRST DRAFT:
Proponent: Kimberly Paarlberg, ICC
Desired Action: Affirmative with comment
Modification:
Reason: It is my understanding that the studies being reviewed by the Communications work group has not considered stairway geometry or lighting as part of the reduction on falls on stairways. I believe that there should be no additional criteria for stripes on stairways past what is currently required until such time as we have complete information.

05-13 – 2021 Public Comment 1
504.6

Proponent: Koni Sims, Pat Sheehan, representing American Council of the Blind (ACB)

Replace with the following:

504.6 Visual contrast. Visual contrast shall comply with either 1, or 2:

1. The leading 1 to 2 inches (25 to 51 mm) of every tread and landing, measured horizontally from the leading edge of the nosing. The solid color shall provide a high contrast minimum of 70% shall consist of a solid color having visual contrast of dark-on-light or light-on-dark from the remainder of the tread or landing. The contrasting marking shall be durable and shall extend from one side of each tread to the other side of each tread.

2. Durable distinctive warning markings required by the adopted building code or ANSI safety standard.

REASON: The key to this modification to the proposal is improved safety for people with low vision as they approach and use stairs. Over the past thirty years, the blindness community has
demanded contrasting stripes at or near nosings on stair treads and landings. Individuals with low vision, particularly those unfamiliar with the stair location and its geometry, must negotiate what is, for them, a hazardous walking surface (stairs). A 70% or greater contrast equates to the light reflective value (LRV) difference of 65 points on a 100-point scale. Applying a uniform standard for stair striping promotes safety and accessibility for seniors and low vision individuals who rely low vision for mobility.

Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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<td>Modification (if any):</td>
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<td>Committee Reason: The Communications task group needs additional time for development of LRV requirements.</td>
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<td>Desired Action: Negative with comment</td>
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<td>Reason: Proposed modification due to the work of the Stair Contrast Sub Group of the Communication Task Group.</td>
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<tr>
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<td>Reason: It is my understanding that the studies being reviewed by the Communications work group has not considered stairway geometry or lighting as part of the reduction on falls on stairways. I believe that there should be no additional criteria for stripes on stairways past what is currently required until such time as we have complete information.</td>
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05-14 – 2021 overview

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<td>504.9, 504.9.1, 504.9.2</td>
<td>D 23-2-1</td>
<td>7-14-2022</td>
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<td>Negative</td>
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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-14 – 2021
504.9, 504.9.1, 504.9.2

Proponent: Kimberly Paarlberg, International Code Council

Revise text as follows:

**SECTION 504**
**STAIRWAYS**

**504.9 Lighting.*** Lighting for interior stairways shall comply with Section 504.9 1008.2 of the International Building Code.

**504.9.1 Illumination level.** Lighting facilities shall be capable of providing illuminance of stairs measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings as follows:

1. A 1-foot-candle (10.8 lux) minimum illumination at times other than conditions of stair use
2. A 10-foot-candle (108 lux) minimum illumination during conditions of stair use
3. The transition from 1-foot-candle (10.8 lux) to 10-foot-candle (108 lux) under conditions of stair use shall be permitted to be achieved by automatic, motion sensor-type lighting switches provided the switch controllers comply with all of the following:
   3.1 The switch controllers are equipped for fail-safe operation and evaluated for this purpose
   3.2 The motion sensor is activated by occupant movement on the stair or stair landings
   3.3 The illumination timers are set for a minimum 15-minute duration.

**504.9.2 Lighting controls.** If provided, occupancy sensing automatic controls shall activate the stairway lighting so the illuminance level required by Section 504.9.1 is provided on the
entrance landing, each stair flight adjacent to the entrance landing, and on the landings above and below the entrance landing prior to any step being used.

**REASON:** This proposal is not intended to remove this requirement, but rather to reference the more complete requirements in the IBC. The requirement in the IBC are for interior exit access and exit stairways and exterior exit stairways – current A117.1 is only interior. The IBC has a reasonable exception for stepped aisles in auditoriums and theaters during a performance – the ICC A117.1 does not have this exception. The IBC Section 1008.2.1 required 1 foot candle on the stairways and landings when the building is occupies, and 10 foot candles when the stairway and landings are in use. There are more extensive provision for lighting controls in the International Energy Conservation Code in Section C405.2.2.1.

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**05-14 – 2021 Modification**

**Proponent:** Kimberly Paarlberg, International Code Council

Further revise text as follows:

**SECTION 106**

**REFERENCED DOCUMENTS**


**Reason:** A reference to IBC would require this to be a referenced standard in Section 106.

---

Staff Note: Mod is ruled editorial.

Committee Action: 23-2-1 Disapproved

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:** This proposal was disapproved because the committee felt that the lighting provisions for stairways should stay in the standard. A BALLOT COMMENT to address exterior stairways or exceptions for steps in assembly seating venues could be considered.

---

**05-14 – 2021 Ballot Comments**

**BALLOT COMMENT 1- FIRST DRAFT:**

*Proponent: Kim Paarlberg representing ICC*
05-14 – 2021 Ballot Comment 1

504.9

Proponent: Kimberly Paarlberg, ICC

Replace with the following:

SECTION 504
STAIRWAYS

504.9 Lighting. Lighting for interior stairways shall comply with Section 504.9.

Exceptions:
1. Utility buildings.
2. Aisle accessways in assembly spaces to view a performance or movie projection.
3. Within individual dwelling units and sleeping units

504.9.1 Illumination level. Lighting facilities shall be capable of providing illuminance of stairs measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings as follows:
1. A 1-foot-candle (10.8 lux) minimum illumination at times other than conditions of stair use
2. A 10-foot-candle (108 lux) minimum illumination during conditions of stair use
3. The transition from 1 foot candle (10.8 lux) to 10 foot candle (108 lux) under conditions of stair use shall be permitted to be achieved by automatic, motion sensor-type lighting switches provided the switch controllers comply with all of the following:
   3.1 The switch controllers are equipped for fail-safe operation and evaluated for this purpose.
   3.2 The motion sensor is activated by occupant movement on the stair or stair landings.
   3.3 The illumination timers are set for a minimum 15-minute duration.

504.9.2 Lighting controls. If provided, occupancy-sensing automatic controls shall activate the stairway lighting so the illumination level required by Section 504.9.1 is provided on the entrance landing, each stair flight adjacent to the entrance landing, and on the landings above and below the entrance landing prior to any step being used.

REASON: There are spaces where the lights need to be turned off when a space is occupied – theaters for performances or movies; where people are sleeping; within utility buildings such as agricultural buildings or where there is no power. Further minimums would be addressed in the IBC.
Committee Action for Ballot Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

Report for 05-14–2021

Committee decision: D  Committee Vote at Meeting: 23-2-1  Committee Vote on Ballot: 39-1-1

REPORT OF HEARING:

Modification (if any):

Committee Reason: This proposal was disapproved because the committee felt that the lighting provisions for stairways should stay in the standard. A BALLOT COMMENT to address exterior stairways or exceptions for steps in assembly seating venues could be considered.

BALLOT COMMENT - FIRST DRAFT:

Proponent: Kim Paarlberg representing ICC

Desired Action: Negative with comment

Modification:

Replace with the following:

SECTION 504 STAIRWAYS

504.9 Lighting. Lighting for interior stairways shall comply with Section 504.9.

Exceptions:

1. Utility buildings.
2. Aisle accessways in assembly spaces to view a performance or movie projection.
3. Within individual dwelling units and sleeping units

504.9.1 Illumination level. Lighting facilities shall be capable of providing illuminance of stairs measured at the center of tread surfaces and on landing surfaces within 24 inches (610 mm) of step nosings as follows:

1. A 1-foot-candle (10.8 lux) minimum illumination at times other than conditions of stair use
2. A 10-foot-candle (108 lux) minimum illumination during conditions of stair use
3. The transition from 1 foot candle (10.8 lux) to 10 foot candle (108 lux) under conditions of stair use shall be permitted to be achieved by automatic, motion sensor-type lighting switches provided the switch controllers comply with all of the following:

3.1 The switch controllers are equipped for fail-safe operation and evaluated for this purpose
3.2 The motion sensor is activated by occupant movement on the stair or stair landings
3.3 The illumination timers are set for a minimum 15-minute duration.

504.9.2 Lighting controls. If provided, occupancy-sensing automatic controls shall activate the stairway lighting so the illuminance level required by Section 504.9.1 is provided on the entrance landing, each stair flight adjacent to the entrance landing, and on the landings above and below the entrance landing prior to any step being used.

Reason: There are spaces where the lights need to be turned off when a space is occupied – theaters for performances or movies; where people are sleeping; within utility buildings such as agricultural buildings or where there is no power. Further minimums would be addressed in the IBC.

Committee decision: AS/AM/D  Committee Vote at Meeting: 23-2-1  Committee Vote on Ballot: 39-1-1

REPORT OF HEARING – SECOND DRAFT:

Modification (if any):

Committee Reason:

BALLOT COMMENT - SECOND DRAFT:
05-16 – 2021 overview

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<td>05-16</td>
<td>Hedman</td>
<td>106.2.8(New), 504.12(New)</td>
<td>D 30-0-2</td>
<td>5-11-2023</td>
<td>Tabled on 06-16-2022 until end of agenda</td>
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**Comment** | **Proponent** | **Requested Action** | **Committee Action** | **Mtg. Date** | **Notes; Groups; groupings**
---|---|---|---|---|---|
BC1 | Toji, HLAA | Negative | | | |
BC2 | Mazz, USA | Negative | | | |
PC1 | Jaray, Dittman, Hedman, Lormann | AS | | | |

BC = Ballot Comment, PC = Public comment, **Bold Comment number** is proposed revision below

**05-16 – 2021**

**106.2.8 (New), 504.12(New)**

**Proponent:** Glenn Hedman, PhD, PE, CPE, University of Illinois at Chicago representing RESNA Assistive Technology Standards Committee on Emergency Stair Travel Devices used by Individuals with Disabilities

Revise text as follows:

**SECTION 504**

**STAIRWAYS**

**504.12 Emergency stair travel devices.** Where emergency stair travel devices are provided, they shall be compliant with ANSI/RESNA ED-1 listed in Section 106.2.8.

**SECTION 106**

**REFERENCED DOCUMENTS**


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**REASON:** ANSI/RESNA ED-1:2021 is a performance standard for emergency stair travel devices (ESTDs) used by individuals with disabilities. The standard includes sections on terminology, required safety features, and methods of measurement of device size, as well as test
methods for minimum weight capacity, forward and lateral stability, and maneuverability. The performance tests can be applied to devices of any design type.

The RESNA Assistive Technology Standards Committee on ESTDs, which drafted the standard, is a diverse group which includes consumer advocates, engineers, clinicians, researchers, code officials, and manufacturers.

Inclusion of the proposed reference to ANSI/RESNA ED-1:2022 will help promote the provision of effective devices to assist individuals with disabilities, and those operating the devices, in evacuating buildings safely.

*Staff note:* This standard is current being update. Glenn Hedman will provide a copy for the committee review after the new standard is available.

**Committee Action:** Disapproval 30-0-2

**REPORT OF HEARING:**

**Modification (if any):**

**Committee Reason:** The proponent requested disapproval because the new standard with all the improvements is not ready at this time. It should be finished in the summer of 2023.

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**05-16 – 2021 Ballot Comments**

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<tr>
<td>Proponent: Sharon Toji, Hearing Loss Association of America</td>
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<tr>
<td>Desired Action: Negative with comment</td>
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<tr>
<td>Modification:</td>
</tr>
<tr>
<td>Reason: Standards for these devices are urgently needed. Including this reference to the upcoming RESNA standard is therefore important, and including the referenced here will no doubt serve to influence RESNA in completing their work by the time the new ANSI standard is published.</td>
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<td>Proponent: Marsha Mazz, USA</td>
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<tr>
<td>Desired Action: Negative with comment</td>
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<tr>
<td>Modification:</td>
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<tr>
<td>Reason: Approve as submitted. The committee erred in not accepting this public comment.</td>
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</table>
Where Emergency Stair Travel Devices are provided, compliance with ANSI/RESNA ED-1:2021 is essential to their accessibility and usability. Devices not in compliance with this document pose potential safety risks to building occupants with disabilities and those assisting them.

05-16 – 2021 Public Comment 1
106.2.8 (New), 504.12(New)

Proponent:
Trevor de Jaray, Garaventa (Canada) Ltd.
Laurie Dittman, Chicago Mayor’s Office for People with Disabilities.
Glenn Hedman, PhD, PE, CPE, University of Illinois at Chicago representing RESNA Assistive Technology Standards Committee on Emergency Stair Travel Devices used by Individuals with Disabilities
Alicia Lormann

Request approval as submitted.

REASON:
De Jaray, Dittman, Hedman, Lormann: The 2023 revision of the current ANSI/RESNA ED-1 Standard is making its way through the RESNA and ANSI approval processes. The revised standard will be available for review by the ICC A117.1 Committee as it reconsiders 05-16-2021.

Committee Action for Public comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-16 Multiple.doc

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):
Committee Reason:

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<td>Committee Reason:</td>
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<td>Committee Reason: The proponent requested disapproval because the new standard with all the improvements is not ready at this time. It should be finished in the summer of 2023.</td>
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<td>Reason: Standards for these devices are urgently needed. Including this reference to the upcoming RESNA standard is therefore important, and including the referenced here will no doubt serve to influence RESNA in completing their work by the time the new ANSI standard is published.</td>
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<td>Proponent: Marsha Mazz, USA</td>
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<td>Modification:</td>
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<td>Reason: Approve as submitted. The committee erred in not accepting this public comment. Where Emergency Stair Travel Devices are provided, compliance with ANSI/RESNA ED-1:2021 is essential to their accessibility and usability. Devices not in compliance with this document pose potential safety risks to building occupants with disabilities and those assisting them.</td>
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<td>Committee Reason:</td>
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504.5 Nosings. Nosings shall comply with the following:
1. Nosings within a stairway shall be uniform.
2. If rounded, the radius of curvature at the leading edge of the tread shall be 1/2 inch (13 mm) maximum.
3. If beveled, the bevel at the leading edge shall slope at 45 degrees to the plane of the top surface of the tread and landing and extend for a horizontal distance of ½ inch (13 mm) maximum.
4. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled.
5. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical.
6. The permitted projection of the nosing shall be \( \frac{11}{2} \) \( 1 \frac{1}{4} \) inches (38 32 mm) maximum over the tread or floor below.

FIGURE 504.5(A)
STAIR NOSINGS - VERTICAL RISER - CURVE OR BEVEL AT LEADING EDGE
FIGURE 504.5(B)
STAIR NOSINGS - VERTICAL RISER CURVED NOSING
(Note: Revise drawings to change 1-1/2 to 1-1/4)

FIGURE 504.5(C)
STAIR NOSINGS - VERTICAL RISER BEVELED NOSING
(Note: Revise drawings to change 1-1/2 to 1-1/4 and add 30 degrees maximum)

FIGURE 504.5(D)
STAIR NOSINGS - VERTICAL RISER ANGLED RISER
(Note: Revise drawings to add 1-1/4)

REASON: The nosing projection allowed in the IBC is only 1 ¼ inches (32 mm) the A117.1 standard should cause confusion because it specifies a larger nosing projection that is contradictive.
# 05-18 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

## 05-18 – 2021

### 505.5

**Proponent:** Gene Boecker, Code Consultants, Inc.

**Revise as follows:**

**SECTION 504**

**STAIRWAYS**

**505.5 Clearance.** Clearance between handrail gripping surface and adjacent surfaces shall be 1 1/2 inches (38 mm) minimum. The space between the handrail and projecting objects above the handrail shall be 18 inches (455 mm) minimum. A projecting object shall not project further than the inside face of the handrail.

**REASON:** Although this was deleted from the provisions, it needs to be brought back. We have recently seen a handrail located in a recess that had only 3 inches clear above the top gripping surface. This makes the condition potentially unsafe since the top of the hand can contact the underside of the projecting wall above.

In researching this issue, it was found that other elements could become problematic as well. Wall sconces and artwork mounted to the wall can become elements that may adversely affect the ability to grasp the handrail in an emergency condition.

Committee Action: 19-6-5 Approved as submitted

**REPORT OF HEARING:**

**Modification (if any):**
Committee Reason: The committee agreed that there should be clearances above the handrails but did not agree on what that dimension should be. There was also concern that the first and 2nd added sentences do not work together and might conflict with the protruding object criteria in Section 307.

05-18 – 2021 Ballot Comments

<table>
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<th>BALLOT COMMENT 1- FIRST DRAFT:</th>
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<td>Proponent: Kimberly Paarlberg, ICC</td>
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<tr>
<td>Desired Action: Negative with comment</td>
</tr>
<tr>
<td>Modification:</td>
</tr>
<tr>
<td>Reason: This proposal needs to be disapproved. There is a conflict between the two sentences. The first says you cannot have anything over the handrail for 18”. At the top or bottom of a stairways, this could be a room designation sign or a light switch. The 2nd sentence then goes on to say that projections you just told me I could not have can go out as far as the handrails – or is this a projection at any height over the handrail – such as well sconces?</td>
</tr>
<tr>
<td>I found this picture in a 2007 Florida building code. If this is what Gene is trying to do the text does not do this. This has been deleted from the Florida code, so I cannot access the text. I remember this is BOCA over 20 years ago, but I don’t think it has ever been in IBC.</td>
</tr>
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</table>

I have found out that this is 1990 ADA and was removed. Text was – “Handrails may be located in a recess if the recess is a maximum of 3 inches (76 mm) deep and extend at least
18 inches above the top of the rail.” I am not proposing this, because I don’t think the text matches the figure.

**BALLOT COMMENT 2- FIRST DRAFT:**
Proponent: Dan Buuck, NAHB
Desired Action: Affirmative with comment
Modification:
Reason:
It is unclear in which direction the user is to measure the 18 inches. It could be interpreted as not allowing anything above the plane of the handrail to be within 18 inches horizontally from the handrail. The intent of the second sentence is also unclear. At the very least, a diagram would be helpful for clarification.

**BALLOT COMMENT 3- FIRST DRAFT:**
Proponent: David Cooper, SMA
Desired Action: Negative with comment
Modification:
**505.5 Clearance.** Clearance between handrail gripping surface and adjacent surfaces shall be 1 1/2 inches (38 mm) minimum. The space between the handrail and projecting objects above the handrail shall be 18 inches (455 mm) minimum. A projecting object shall not project further than the inside face of the handrail.

Reason: The last sentence should be deleted because it will cause confusion with the requirements for protruding objects covered elsewhere in the standard.

---

05-18 – 2021 Ballot Comment 3

**505.5**

Proponent: David Cooper, SMA

Further revise as follows:

**SECTION 504**

**STAIRWAYS**

**505.5 Clearance.** Clearance between handrail gripping surface and adjacent surfaces shall be 1 1/2 inches (38 mm) minimum. The space between the handrail and projecting objects above the handrail shall be 18 inches (455 mm) minimum. A projecting object shall not project further than the inside face of the handrail.

**REASON:** The last sentence should be deleted because it will cause confusion with the requirements for protruding objects covered elsewhere in the standard.
Committee Action for Ballot Comment 3:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-18 – 2021 Public Comment 1

505.5

Proponent: Gene Boecker, CCI

Further revise as follows:

SECTION 504
STAIRWAYS

505.5 Clearance. Clearance between handrail gripping surface and adjacent surfaces shall be 1 1/2 inches (38 mm) minimum. The space between the handrail and projecting objects above the handrail shall be 18 24 inches (455 610 mm) minimum. A projecting object shall not project further than the inside face of the handrail.

REASON: The committee liked the concept but felt the wording in the last sentence was difficult. So, it’s proposed to no longer be a part of the proposal. The height was felt to be not what’s best and might need to be higher. I agree and did some research.

The average shoulder height of an adult male is 57 inches above the floor. Handrail height must be 34-38 inches above the floor/nosing of the ramp/stair. Assuming the handrail is at it’s lowest, shoulder height will be 23 inches above the handrail (57” – 34” = 23”). I then suggest to round up an inch – both for safety and to make an easier measurement to remember.

As the original proposal was intended, this will eliminate handrails being placed in slots in the wall, with no effective way to use them.

Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:
Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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<td>Committee Reason: The committee agreed that there should be clearances above the handrails but did not agree on what that dimension should be. There was also concern that the first and 2nd added sentences do not work together and might conflict with the protruding object criteria in Section 307.</td>
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<td>Proponent: Kimberly Paarlberg, ICC</td>
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<tr>
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<td>Reason: This proposal needs to be disapproved. There is a conflict between the two sentences. The first says you cannot have anything over the handrail for 18”. At the top or bottom of a stairways, this could be a room designation sign or a light switch. The 2nd sentence then goes on to say that projections you just told me I could not have can go out as far as the handrails – or is this a projection at any height over the handrail – such as well sconces?</td>
</tr>
<tr>
<td>I found this picture in a 2007 Florida building code. If this is what Gene is trying to do the text does not do this. This has been deleted from the Florida code, so I cannot access the text. I remember this is BOCA over 20 years ago, but I don’t think it has ever been in IBC.</td>
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I have found out that this is 1990 ADA and was removed. Text was – “Handrails may be located in a recess if the recess is a maximum of 3 inches (76 mm) deep and extend at least 18 inches above the top of the rail.” I am not proposing this, because I don’t think the text matches the figure.

BALLOT COMMENT 2- FIRST DRAFT:
Proponent: Dan Buuck, NAHB
Desired Action: Affirmative with comment
Modification:
Reason:
It is unclear in which direction the user is to measure the 18 inches. It could be interpreted as not allowing anything above the plane of the handrail to be within 18 inches horizontally from the handrail. The intent of the second sentence is also unclear. At the very least, a diagram would be helpful for clarification.

BALLOT COMMENT 3- FIRST DRAFT:
Proponent: David Cooper, SMA
Desired Action: Negative with comment
Modification:
505.5 Clearance. Clearance between handrail gripping surface and adjacent surfaces shall be 1 1/2 inches (38 mm) minimum. The space between the handrail and projecting objects above the handrail shall be 18 inches (455 mm) minimum. A projecting object shall not project further than the inside face of the handrail.
Reason: The last sentence should be deleted because it will cause confusion with the requirements for protruding objects covered elsewhere in the standard.

Committee decision: AS/AM/D
Committee Vote at Meeting: 
Committee Vote on Ballot: 

REPORT OF HEARING – FIRST DRAFT
Modification (if any):
Committee Reason:

BALLOT COMMENT- SECOND DRAFT:
Proponent: 
Desired Action:
Modification:
Reason:
Committee decision: AS/AM/D
Committee Vote at Meeting: 
Committee Vote on Ballot: 

FINAL ACTION:
Modification (if any):
Committee Reason:
05-21 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-21 – 2021
505.10.1, 505.10.2, 505.10.3, Figures 505.10.3

**Proponent:** David Cooper, Stair Design and Manufacturing Consultants, representing Stairbuilders and Manufacturers Association

**Revise as follows:**

**SECTION 505**
**HANDRAILS**

**505.10.1 Top and bottom extension at ramps.** Ramp handrails shall extend horizontally above the landing 12 inches (305 mm) minimum beyond the top and bottom of ramp runs. Extensions shall return to a wall, guard, or floor, or shall be continuous to the handrail of an adjacent ramp run or adjacent flight of stairs.
505.10.2 Top extension at stairs. At the top of a stair flight, handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum beginning directly above the landing nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight or adjacent ramp run.

505.10.3 Bottom extension at stairs. At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance equal to one tread depth beyond the bottom tread.
nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight or adjacent ramp run.

**FIGURE 505.10.3**  
BOTTOM HANDRAIL EXTENSION AT STAIRS

**REASON:** It is very common for stairs and ramps in juxtaposition to leave no room for typical handrail extensions but it is often feasible to make the handrail continuous at the intersection of the ramp and stair just as it is to provide continuity at adjoining ramp runs and adjoining flights of stairs.

Committee Action: 32-0-2 Disapproved

**REPORT OF HEARING:**
Modification (if any):

Committee Reason: The language is confusing. The reason is not specific on why this change in needed. No supporting data was submitted. There is concern that ‘continuous’ handrails should be along the same path and direction of travel, not a ramp and stairway that come up to the same landing.

**05-21 – 2021 Ballot Comments**

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ICC A117.1 Comments on 1st draft Chapters 1 to 5 – 8-31-2023  pg. 372
**Reason:** The discussion related to disapproval relayed serious concerns that I will try to address with a BALLOT COMMENT that will include drawings to clearly illustrate. The standard currently allows reasonable economy of space and no handrail extensions where the rail is continuous between ramp runs or continuous between flights of stairs. Stairs and ramps are commonly adjacent in the built environment. Providing guidance for handrail continuity between stairs and ramps will aid in understanding, compliance, and improved accessibility.

**05-21 – 2021 Public Comment 1**

**505.10.1, 505.10.2, 505.10.3**

**Proponent:** David Coopers, SMA

Replace with the following:

SECTION 505
HANDRAILS

505.10.1 **Top and bottom extension at ramps.** Ramp handrails shall extend horizontally above the landing 12 inches (305 mm) minimum beyond the top and bottom of ramp runs. Extensions shall return to a wall, guard, or floor, or shall be continuous to the handrail of an adjacent ramp run or continuous to the handrail extension of an adjacent flight of stairs.

505.10.2 **Top extension at stairs.** At the top of a stair flight, handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum beginning directly above the landing nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight or continuous to the handrail extension of an adjacent ramp run.

505.10.3 **Bottom extension at stairs.** At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance equal to one tread depth beyond the bottom tread nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight or continuous to the handrail extension of an adjacent ramp run.

**REASON:** The drawing below is included to clearly illustrate the modification’s intent to provide handrail continuity by allowing the connection of handrail extensions at adjacent ramps and stairs. Currently the standard does not allow the handrails of ramps and stairs to be connected regardless of the distance between them but requires the termination of extensions by returning them to a wall, guard, or floor. This modification provides for continuity and potential economy of space when compared to the requirement to return the handrail extensions.
Committee Action for Public Comment 1:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-21 – 2021 Public Comment 2
505.10, 505.10.1, 505.10.2, 505.10.3

Proponent: Thomas Zuzik, representing NOMMA

Replace with the following:

SECTION 505
HANDRAILS
505.10 Handrail extensions. Handrails shall extend beyond and in the same direction of stair flights and ramp runs in accordance with Section 505.10.

Exceptions:
1. Continuous handrails at the inside turn of stairs to another stair and ramps to another ramp.
2. Handrail extensions shall not be required in aisles serving seating where the handrails are discontinuous to provide access to seating and to permit crossovers within the aisle.
3. In alterations, full extensions of handrails shall not be required where such extensions would be hazardous due to plan configuration.

505.10.1 Top and bottom extension at ramps. Ramp handrails shall extend horizontally above the landing 12 inches (305 mm) minimum beyond the top and bottom of ramp runs and shall extend the required minimum length before any change in direction or decrease in clearances required by Section 505.3 or 505.5. Extensions shall return to a wall, guard, or floor, or shall be continuous to the an adjacent handrail of an adjacent ramp run.

505.10.2 Top extension at stairs. At the top of a stair flight, handrails shall extend horizontally beyond above the landing nosing for 12 inches (305 mm) minimum, starting at the landing’s nosing and shall extend the required minimum length before any change in direction or decrease in clearances required by Section 505.3 or 505.5. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the an adjacent handrail of an adjacent stair flight.

505.10.3 Bottom extension at stairs. At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance equal to one tread depth beyond the bottom tread nosing and shall extend the required minimum length before any change in direction or decrease in clearances required by Section 505.3 or 505.5. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the an adjacent handrail of an adjacent stair flight.

REASON: Handrail extensions continue to be one of the most widely misinterpreted, incorrectly designed and inspected items in the built environment for accessibility. A previous proposal approved by the committee, 05-19-2021, clarified the main section of 505.10, however, there are a few areas that still needed additional clarification and are being submitted with this public comment.

For context, this is what passed for 05-19, in the first round as modified.

05-19-2021 AM
§505 506.10 Handrail extensions. Handrail extensions shall be in accordance with Section 505.10 and shall extend not less than the minimum required distance beyond and in the same direction of stair flights and ramp runs without any change in direction or a decrease in clearances required by Sections 505 506.5 and 505 506.6 in accordance with Section 505.10.

The current Exception 1 in section 505.10 allows for a handrail extension to be exempt at the inside turn of stairs and ramps, but does not define all the requirements it must comply with for when allowed. This leaves open and requires the reader to also interpret the intended
requirements in 505.10.1 through 505.10.3 for the additional requirement of when this exception is allowed at those inside turns.

Let’s first look at the last sentence in 505.10.1, which only allows a ramp handrail extension to connect and be continuous to another ramp, or it must return to a wall, guard, or landing surface. It defines no option to be continuous to another handrail of a stair flight, even after exceeding the minimum extension requirement. This however is done all the time in the field, and to date has not been called out or failed that I am aware of, except when the minimum extensions are not completed before connecting the handrails. However the text is the text and should be discussed at a minimum for intent and technically when splitting hairs is allowed or not.

In the last sentence in 505.10.2, which only allows the handrail extension at the top of a stair flight to connect and be continuous to another stair flight handrail, or it must return to a wall, guard, or landing surface. It clearly defines no option to be continuous to a handrail of a ramp, even after exceeding the minimum extension requirements for both the ramp and stair.

In the last sentence in 505.10.3, which only allows the handrail extension at the bottom of a stair flight to connect and be continuous to another stair flight handrail, or it must return to a wall, guard, or landing surface. It again defines no option, as does 505.10.2, to be continuous to a handrail of a ramp.

The addition of the clarifying text currently in 505.10.1 through 505.10.3 being moved into exception 1, clarifies the intent of the exception is only allowed from a ramp to a ramp or stair to a stair, and not a stair to a ramp.

With the clarification now clearly defined in exception 1, when the minimum extension requirement is exempt. The revision of the text in 505.10.1 through 505.10.3 can simply state the extension can be continuous to another handrail period and meet the current text’s requirements in a clearer manner and not to be obscured.

Additionally, though more of an editorial committee review, the figures within 505.10, sections 1, 2 and 3 do not properly show that the extension is required to pass through the minimum distance before terminating or changing in any direction. This public comment proposes 3 new figure replacements, or at a minimum, the concept to replace the current badly misrepresented intent of the terminations presently in the standard. Additionally, the plan view diagram below in the reason statement shows how the new diagrams fit within a floor plan layout in context.
Committee Action for Public Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-21 Zuzik.doc

Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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REPORT OF HEARING:

Modification (if any):

Committee Reason: The language is confusing. The reason is not specific on why this change is needed. No supporting data was submitted. There is concern that ‘continuous’ handrails should be along the same path and direction of travel, not a ramp and stairway that come up to the same landing.

BALLOT COMMENT 1- FIRST DRAFT:

Proponent: David Cooper representing SMA

Desired Action: Negative with comment
The discussion related to disapproval relayed serious concerns that I will try to address with a BALLOT COMMENT that will include drawings to clearly illustrate. The standard currently allows reasonable economy of space and no handrail extensions where the rail is continuous between ramp runs or continuous between flights of stairs. Stairs and ramps are commonly adjacent in the built environment. Providing guidance for handrail continuity between stairs and ramps will aid in understanding, compliance, and improved accessibility.

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s05-24 – 2021 overview

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BC= Ballot Comment, PC= Public comment, **Bold Comment number** is proposed revision below

05-24 – 2021

507.1

Proponent: Marsha Mazz, representing United Spinal Association

Revise as follows:

SECTION 507
ACCESSIBLE ROUTES THROUGH PARKING

507.1 General. Where accessible routes pass through parking facilities, they shall be physically separated protected from vehicular traffic.

Exceptions:
1. Accessible routes crossings drive aisles shall not be required to comply with this section.
2. Accessible routes only from parking spaces complying with Section 502 and passenger loading zones complying with Section 503 to accessible entrances shall not be required to comply with this section.

REASON: Users are confused as to the meaning of the requirement to “physically separate” routes through parking from vehicular traffic. They ask if this means that the route must be raised above the traffic lanes and how high or if a yellow line would suffice. When considering this proposal, the committee also struggled with this wording. We believe the word “protected” works better than “separated” and is a more acceptable performance standard as it better conveys the purpose. The designer would have to determine how to protect the route – they might elevate it to curb level, provide barriers such as wheel stops, jersey barriers, railings, or anything else that affords some physical protection. A pavement marking would not comply because although it is a physical element, it fails to afford “protection”. Under the current text, however, a pavement marking could be construed to meet the requirement for “physical separation”.

ICC A117.1 Comments on 1st draft Chapters 1 to 5 – 8-31-2023 pg. 379
Staff Note: Held to next meeting.

Committee Action: 25-1-4 As Submitted

REPORT OF HEARING:
Modification (if any):

**Committee Reason:** The term ‘protect’ better explains the purpose of this requirement.

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**05-24 – 2021 Ballot Comments**

| BALLOT COMMENT 1- FIRST DRAFT: |
| Proponent: **Doug Anderson, AHLA** |
| Desired Action: Negative with comment |
| **Modification:** |
| **Reason:** Vague language |

| BALLOT COMMENT 2- FIRST DRAFT: |
| Proponent: **David Cooper representing SMA** |
| Desired Action: Affirmative with comment |
| **Modification:** See Ballot Comment 2 |
| **Reason:** Although this change offers improved understanding, the term protection lacks specificity and could be widely interpreted. Perhaps a laundry list as offered in the modification below is needed. |

| BALLOT COMMENT 3- FIRST DRAFT: |
| Proponent: **Sean McNamara representing Target** |
| Desired Action: Negative with Comment |
| **Modification:** |
| **Reason:** Requiring physical “protection” from vehicular traffic is still ambiguous and not much better than the existing physical “separation” requirement. Specifying protection is also setting a potentially high bar for designers to comply with this requirement. To many code users, unless clearer direction is provided, “physically protected” would require the use of a vehicle barrier to protect pedestrians. Per IBC §1607.10 vehicle barriers for passenger vehicles shall be designed to resist a concentrate load of 6000lbs. in accordance with §4.5.3 of ASCE 7. None of the options listed in the reason statement (curb, wheel stops, jersey barriers, railings, or anything else that affords some physical protection) appear to meet this high bar when evaluated under the conditions in ASCE 7. |

**4.5.3 Loads on Vehicle Barrier Systems (ASCE 7-10)**

Vehicle barrier systems for passenger vehicles shall be designed to resist a single load of
6,000 lb (26.70 kN) applied horizontally in any direction to the barrier system, and shall have anchorages or attachments capable of transferring this load to the structure. For design of the system, the load shall be assumed to act at heights between 1 ft 6 in. (460 mm) and 2 ft 3 in. (686 mm) above the floor or ramp surface, selected to produce the maximum load effect. The load shall be applied on an area not to exceed 12 in. by 12 in. (305 mm by 305 mm) and located so as to produce the maximum load effects. This load is not required to act concurrently with any handrail or guardrail system loadings specified in Section 4.5.1.

05-24 – 2021 Ballot Comment 2
507.1

Proponent: David Cooper, SMA

Further revise as follows:

SECTION 507
ACCESSIBLE ROUTES THROUGH PARKING

507.1 General. Where accessible routes pass through parking facilities, they shall be physically separated and protected from vehicular traffic by wheel stops, a barrier no less than curb height above the parking surface, or by elevating the walking surface to curb height.

Exceptions:
1. Accessible routes crossings drive aisles shall not be required to comply with this section.
2. Accessible routes only from parking spaces complying with Section 502 and passenger loading zones complying with Section 503 to accessible entrances shall not be required to comply with this section.

REASON: Although this change offers improved understanding, the term protection lacks specificity and could be widely interpreted. Perhaps a laundry list as offered in the modification below is needed.

Committee Action for Ballot Comment 2:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

05-24 Cooper.doc
Committee Action for First Ballot:

REPORT OF HEARING:

Modification (if any):

Committee Reason:

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REPORT OF HEARING:

Modification (if any):

Committee Reason: The term ‘protect’ better explains the purpose of this requirement.

BALLOT COMMENT 1 - FIRST DRAFT:

Proponent: Doug Anderson, AHLA

Desired Action: Negative with comment

Modification:

The term ‘protect’ better explains the purpose of this requirement.

BALLOT COMMENT 2 - FIRST DRAFT:

Proponent: David Cooper representing SMA

Desired Action: Affirmative with comment

Modification:

507.1 General. Where accessible routes pass through parking facilities, they shall be physically separated and protected from vehicular traffic by, wheel stops, a barrier no less than curb height above the parking surface, or by elevating the walking surface to curb height.

Exceptions:

1. Accessible routes crossing drive aisles shall not be required to comply with this section.
2. Accessible routes only from parking spaces complying with Section 502 and passenger loading zones complying with Section 503 to accessible entrances shall not be required to comply with this section.

Reason: Although this change offers improved understanding, the term protection lacks specificity and could be widely interpreted. Perhaps a laundry list as offered in the modification below is needed.

BALLOT COMMENT 3 - FIRST DRAFT:

Proponent: Sean McNamara representing Target

Desired Action: Negative with Comment

Modification:

Requiring physical “protection” from vehicular traffic is still ambiguous and not much better than the existing physical “separation” requirement. Specifying protection is also setting a potentially high bar for designers to comply with this requirement. To many code users, unless clearer direction is provided, “physically protected” would require the use of a vehicle barrier to protect pedestrians. Per IBC §1607.10 vehicle barriers for passenger vehicles shall be designed to resist a concentrate load of 6000lbs. in accordance with §4.5.3 of ASCE 7. None of the options listed in the reason statement (curb, wheel stops, jersey barriers, railings, or anything else that affords some physical protection) appear to meet this high bar when evaluated under the conditions in ASCE 7.

4.5.3 Loads on Vehicle Barrier Systems (ASCE 7-10)
Vehicle barrier systems for passenger vehicles shall be designed to resist a single load of 6,000 lb (26.70 kN) applied horizontally in any direction to the barrier system, and shall have anchorages or attachments capable of transferring this load to the structure. For design of the system, the load shall be assumed to act at heights between 1 ft 6 in. (460 mm) and 2 ft 3 in. (686 mm) above the floor or ramp surface, selected to produce the maximum load effect.

The load shall be applied on an area not to exceed 12 in. by 12 in. (305 mm by 305 mm) and located so as to produce the maximum load effects. This load is not required to act concurrently with any handrail or guardrail system loadings specified in Section 4.5.1.

Committee decision: AS/AM/D

Committee Vote at Meeting: Committee Vote on Ballot: