



Committee Action Report

ON

Committee Actions regarding Public Comments on ICC A117.1 STANDARD THIRD PUBLIC REVIEW DRAFT

November 23, 2015

ICC/ANSI A117.1 STANDARD DEVELOPMENT - 2015 EDITION

**A117.1 Standard Committee
2012 Cycle Changes to review for
2015 Edition of the A117.1 Standard
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ICC A117.1 Standard – Accessible and Usable Buildings and Facilities

Committee Action Report (CAR) on Public Comments received regarding the Third Public Review Draft

November 23, 2015

First Public Review Draft:

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

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

Second Public Review Draft:

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

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

Third Public Review Draft:

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

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

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

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

This report contains the committee's actions on the public comments found in the Public Comment Report – Third Public Review Draft and the Unresolved Issues Report. These actions are subject to final ballot by the full committee. In addition, the proponents of the comments made on the Third Public Review Draft will be asked if they concur with the action of the committee on their comment or feel that there issue is unresolved. Some of the Committee's actions taken at its meeting of November 16 and 17, 2015 result in changes to items published in the Third Public Review Draft. If those actions are sustained through the ballot process, a Fourth Public Review Draft will be published in 2016.

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

3-5-12	
Agenda Item #1.1	
Committee Action on Agenda Item #1.1 – comment number 3-5-12/1.1 - PC 1.1	
Disapproved	
<p>Reason: While the proponent of the comments suggested to the committee that this proposal was essentially a construction tolerance provided to address floor surface materials in these locations. The committee felt that expressing one figure in these locations ignores all other locations. The committee, even if they could find this concept acceptable, doesn't address the wide variety of flooring materials, it doesn't address where materials change over the extent of an accessible route or accessible facility. The issue of construction tolerances needs to be handled on a case by case basis and single provision in a uniform dimension. Finally there was concern expressed that installing these changes would be inconsistent with ADA.</p>	
Comment No: 3-5-12/1.1 – PC 1.1	Submitted by: Doug Anderson American Hotel and Lodging Association

Further revise as follows:

304.2 Floor Surface. Floor surfaces of a turning space shall comply with Section 302. Changes in level exceeding that permitted by Section 303.2 are not permitted within the turning space.

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

305.2 Floor Surfaces. Floor surfaces of a clear floor space shall comply with Section 302. Changes in level exceeding that permitted by Section 303.2 are not permitted within the clear floor space.

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

404.2.3.1 Floor Surface. Floor surface within the maneuvering clearances shall have a slope not steeper than 1:48 and shall comply with Section 302. Changes in level exceeding that permitted by Section 303.2 are not permitted within the maneuvering clearances.

405.7.1 Slope. Landings shall have a slope not steeper than 1:48 and shall comply with Section 302. Changes in level exceeding that permitted by Section 303.2 are not permitted within the landings.

502.5 Floor Surfaces. Parking spaces and access aisles shall comply with Section 302 and have surface slopes not steeper than 1:48. Access aisles shall be at the same level as the parking spaces they serve. Changes in level exceeding that permitted by Section 303.2 are not permitted within the parking spaces and access aisles.

503.4 Floor Surfaces. Vehicle pull-up spaces and access aisles serving them shall comply with Section 302 and shall have slopes not steeper than 1:48. Access aisles shall be at the same level as the vehicle pull-up space they serve. Changes in level exceeding that permitted by Section 303.2 are not permitted within the vehicle pull-up spaces and access aisles.

802.2 Floor Surfaces. The floor surface of wheelchair space locations shall have a slope not steeper than 1:48 and shall comply with Section 302. Changes in level exceeding that permitted by Section 303.2 are not permitted within the floor surface of wheelchair space locations.

Reasons for Comment: Allowing a change in level up to 0.25" provides a reasonable maximum change in level for transitions between flooring or pavement materials.

In addition – regarding Section 503.4: The pull up space and the access aisle are usually two different types of pavement. Most often there is an asphalt pull up space with a concrete access aisle. Installing a transition from asphalt to concrete that is perfectly flush for a 20'-25' length of the pull up space is not very feasible.

5-24-12	
Agenda Item #7.1	
Committee Action on Agenda Item #7.1 – comment number 5-24-12/1.1 – PC1.1	
Disapproved	
<p>Reason: The committee concluded that the version of this exception contained in the Third Public Review Draft is adequate and further amendment does not improve the provision. The text is adequate to provide local enforcement officials clear direction when asked to exempt similar devices. The comment also would add devices and situations that are not part of what needs to be addressed in the design and construction to be accessible to the users of the building. Providing accessibility to features that are used by service personnel or others in maintaining a facility is a function of employment (typically addressed by Title 1 of the ADA) and do not need to be specifically addressed in this standard.</p>	
Comment No: 5-24-12/1.1 – PC 1.1	Submitted by: Robert Feibleman Nevada HAND
	<p>Further revise as follows:</p> <p>Exception: Emergency aid devices, such as fire department hose connections, <u>hose cabinets</u>, valve controls, gauges, police call boxes, <u>key lock boxes</u>, and annunciator panels shall not be required to comply with Section 309 provided that they are used only for emergencies by <u>their intended use is solely by emergency personnel acting in their official capacity, or service providers maintaining such devices.</u></p>
<p>Comment Reason: Two-way communication devices are required by the International Building Code and those used solely by emergency responders, are used by responders include more than police, thus the removal of the word 'police' from call boxes. These devices, are part of systems that are maintained by others, thus touched by responders and system installers and servicing company personnel. My original intent for this revision was to also include fire extinguishers. It would appear the committee felt that those should meet the standard. What about a fire hose, in a cabinet, that requires the turning of a valve?</p>	

4-34-12	
Agenda Item #13.1	
Committee Action on Agenda Item #13.1 – comment number 4-34-12 PC1.1	
Approved as Modified.	
Modification (instead of deleting exception, the action revises the exception as follows):	
Revise as follows:	
<p>404.3.4 Two Doors or Gates in Series. Doors or gates in series shall comply with Section 404.2.5.</p> <p>EXCEPTION: Where both doors or gates in series are power-assist doors, low energy automatic doors or full power automatic doors, the two doors and gates in a series shall not be required to provide a turning space between the doors.</p> <p>Reason: The Committee strongly supported maintaining the concept of this exception. It is seen as one of the few incentives encouraging the installation of power operated doors. There remains space between the doors allowing activation of the second door. The exception had been in the 2003 edition, but was lost in the 2009, the committee's first action in this cycle was to restore the exception. However the Committee realized its original inclusion of the power-assist category of doors was not appropriate because this category of doors does not have battery back-up power source. In the event of a power failure with power assist doors, the committee felt that retaining the turning space to be needed.</p>	
Comment No: 4-34-12/1.1 – PC 1.1	Submitted by: Gigi Scovel Paralyzed Veterans of America
	<p>Further revise as follows:</p> <p>404.3.4 Two Doors or Gates in Series. Doors or gates in series shall comply with Section 404.2.5.</p> <p>EXCEPTION: Where both doors or gates in series are power-assist doors, low energy automatic doors or full power automatic doors, the two doors and gates in a series shall not be required to provide a turning space between the doors.</p>
Comment Reason: This is a reduction in accessibility and a potential life safety issue. If one of the doors in the series malfunctions, if the power is out, or if the doors are not maintained, a person may not be able to turn around to exit the doorway, use the doors, or could potentially become stuck.	

6-20-12																									
Agenda Item #24A.1																									
Committee Action on Agenda Item #24A.1 – comment number 6-20-12/2.1 – PC2.1																									
Disapproved																									
<p>Reason: The committee understood the issue was one of structure support of the partitions on the side where the door opening is only 4 inches from the side partition. Part of the discussion focused on whether the issue is reduced if the partitions are ceiling rather than floor mounted. There was concern that as written in the comment, that such text would not be in agreement with the like provisions in the ADA. This concern focused on the potential of changing the positional relationship between the door and the water closet. There was also concern that have a 5 inch dimension and a 56 inch dimension would be confusing of people didn't see it as alternatives methods of door placement and tried to add 5 + 56. Such would equal 61 inches and would be confusing for the requirement of a minimum 60 inch toilet compartment. The debate regularly came back to that there is nothing to prevent doing a larger compartment to allow more structural support.</p> <p>Note: There was further discussion of simply eliminating the shorter distance and simplifying the requirement of door opening to measuring from the wall or partition closest to the water closet. The merits were not fully explored as such a change was ruled to be out of order because it was beyond the scope of the original proposal.</p>																									
Comment No: 6-20-12/2.1 – PC 2.1	Submitted by: Gene Boecker National Association of Theatre Owners																								
	<p>Further revise as follows:</p> <p style="text-align: center;">Table 604.9.3.1 – Door Opening Locations</p> <table border="1"> <thead> <tr> <th>Door Opening Location</th> <th>Measured From</th> <th>Dimension</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Front Wall or Partition</td> <td>From the side wall or partition closest to the water closet</td> <td>56 inches (1420 mm) minimum</td> </tr> <tr> <td colspan="2" style="text-align: center;">Or</td> </tr> <tr> <td>From the side wall or partition farthest from the water closet</td> <td>4-5 inches (100-125 mm) maximum</td> </tr> <tr> <td rowspan="3">Side Wall or Partition - Wall-Hung Water Closet</td> <td>From the rear wall</td> <td>52 inches (1320 mm) minimum</td> </tr> <tr> <td colspan="2" style="text-align: center;">Or</td> </tr> <tr> <td>From the front wall or partition</td> <td>4-5 inches (100-125 mm) maximum</td> </tr> <tr> <td rowspan="3">Side Wall or Partition - Floor-Mounted Water Closet</td> <td>From the rear wall</td> <td>55 inches (1395 mm) minimum</td> </tr> <tr> <td colspan="2" style="text-align: center;">Or</td> </tr> <tr> <td>From the front wall or partition</td> <td>4-5 inches (100-125 mm) maximum</td> </tr> </tbody> </table>	Door Opening Location	Measured From	Dimension	Front Wall or Partition	From the side wall or partition closest to the water closet	56 inches (1420 mm) minimum	Or		From the side wall or partition farthest from the water closet	4-5 inches (100-125 mm) maximum	Side Wall or Partition - Wall-Hung Water Closet	From the rear wall	52 inches (1320 mm) minimum	Or		From the front wall or partition	4-5 inches (100-125 mm) maximum	Side Wall or Partition - Floor-Mounted Water Closet	From the rear wall	55 inches (1395 mm) minimum	Or		From the front wall or partition	4-5 inches (100-125 mm) maximum
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<p>Comment Reason: While the added "OR" is appropriate, the original intent with the proposal was to address a condition where the pilaster could have two support bolts rather than one. That's the 5 inches rationale. The committee originally</p>																									

agreed that this made sense. I do not recall this being a part of the discussion during the last series of public comments – only the “OR” was discussed. The 5-inch dimension should be reinserted with the “OR” so that the original intent, as previously approved by the committee, can be incorporated. The figure will need to be changed to represent the two conditions; possibly two figures showing each option.

6-37-12	
Agenda Item #24B – Unresolved Issue	
Committee Action on Agenda Item #24B – comment number 6-37-12 PC 1.1 – Unresolved Issue:	
Approved as Modified.	
Modification (instead of modifying the lavatory setback distance, the deleting exception, the action revises the exception as follows):	
Delete without substitution as follows:	
<p>606.5 Basin Location. The interior edge of the rim of the lavatory basin shall be located 3 ½ inches (90 mm) maximum from the front edge of the fixture or countertop.</p>	
<p>Reason: The Committee’s action was based on a concern that insufficient information and research is available on this topic to feel comfortable with selecting any specific setback requirement for lavatories. The origins of the proposal was an desire to have lavatory basins close to the counter edge so people using mobility devices or simply those with lower stature could lean over the lavatory to use it for various activities such as tooth brushing and other toilet/hygiene needs. The debate got entwined with the issue of reach range of the lavatory controls. The consensus was that this topic needed further research which could be accomplished prior to or during the next cycle, but that it was premature to add this into the next edition of the Standard.</p>	
Comment No: 6-37-12 PC1.1	Submitted by: Matt Sigler – PMI
	<p>Further revise as follows:</p> <p>606.5 Basin Location. The interior edge of the rim of the lavatory basin shall be located 3 ½ <u>6</u> inches (90 <u>150</u> mm) maximum from the front edge of the fixture or countertop.</p>
Rationale included with Unresolved Issue distribution – 5/26/15	
<p>PMI does not believe that the Committee’s actions provided an appropriate resolution to our comment for 6-37-12 PC1 (Agenda Item #24B) for the following reasons:</p> <ol style="list-style-type: none"> What is shown in the committee action report for Agenda Item #24B (6-37-12 PC1) is incorrect, and should be replaced with the attached that was discussed during the February Meeting. PMI provided the Technical Committee with the attached field studies conducted by Kohler that demonstrated: <ol style="list-style-type: none"> A 3-1/2 inch basin setback does not work for all disabilities. Some wheel chair users prefer more surface area contact for forearms, this gives them greater control and stability. A setback of 5 inches provided the necessary surface area for such users. Those in opposition to PMI’s comment indicated that Kohler’s field studies were dated, and not based on current practices. However, it was also acknowledged by those who opposed PMI’s comment that no technical data or evidence was ever provided to prove that a 3-1/2 inch maximum basin setback was a valid dimension. Even the Chair acknowledged such when casting his negative vote to break the tie during the February Meeting. Those in opposition to PMI’s comment further indicated that they were opposed to PMI’s comment because they believed that a 3-1/2 inch lavatory basin setback was necessary for those with limited reach, and because the A117.1 does not mandate that a certain percentage of public lavatories meet the requirements of Section 606.6 (Lavatories with Enhanced Reach Range) that all ADA lavatories should have a 3-1/2 inch maximum basin setback. PMI agrees that those with limited reach should have a maximum basin setback of 3-1/2 inches and indicated such within the attached comment that was discussed during the February Meeting. However, PMI does not agree that all ADA lavatories should be required to have a maximum 3-1/2 inch basin setback just because a certain percentage of those with disabilities require it, but instead would encourage the committee to consider mandating that a certain percentage of ADA required lavatories meet the requirements of Section 606.6. PMI is very concerned that an ICC Committee such as A117.1 would knowingly allow a technical requirement into one of their standards/codes that was based on absolutely no technical data. 	

6-46-12	
Agenda Item #25.1	
Committee Action on Agenda Item #25.1 – comment number 6-46-12/2.1 – PC2.1	
Approve as Modified	
<p>Modification (the modification replaces the original comment. It places the revised text in proper context with the previously approved ‘new building’ vs ‘existing building’ format of Section 608.2.1.2.)</p>	
Revise as follows:	
<p>305.8 Seat Back Location. For purposes of this standard, the seat back of a wheelchair within the clear floor space shall be considered 40 inches (1015 mm) from the front or 12 inches (305 mm) from the rear of the wheelchair space.</p>	
608.2.1.2 Clearance	
<p>608.2.1.2.1 New buildings. In new buildings, 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. <u>The length of the clear floor space shall be measured perpendicular from either 1) the control wall or 2) from 4 inches behind the control wall.</u> The seat wall shall align with the wheelchair seat back in accordance with Section 305.8 or be 4 inches (100 mm) maximum behind the seat wall.</p>	
<p>608.2.1.2.2 Existing buildings and within new Type B units. In existing buildings and within new Type B units, 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.</p>	
<p>Reason: The committee concurred with the commenter’s reason that the proposed section 305.8 should not be instituted as a building block requirement in this edition because only one provision refers to it. Further, it will be confusing when viewed in context of the assembly seating provisions. While it isn’t reference in the assembly seating section, the shoulder align of assembly seating vs seat back location may be confusing in application. This does not preclude creating such building block in future editions. The next text provides options for placement of the clearance next to a transfer shower.</p>	
Comment No: 6-46-12/2.1 – PC2.1	Submitted by: Kim Paarlberg International Code Council
	<p>Further revise as follows:</p> <p>608.2.1.2 Clearance. A clearance of 52 inches (1320 mm) minimum in length <u>measured perpendicular between 12 inches (305 mm) and 16 inches (? mm) beyond the seat wall,</u> and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment. The seat wall shall align with the wheelchair seat back as per Section 305.8 Seat Back Location, or be 4 inches (100 mm) maximum behind the seat wall.</p> <p>305.8 Seat Back Location. For the purposes of this standard, the seat back of a wheelchair within the clear floor space shall be considered 40 inches (1015 mm) from the front or 12 inches (305 mm) from the rear of the wheelchair space</p>
Comment Reason: There is no reason to send someone to a separate building block section for seat back alignment. We	

do not do this for shoulder alignment in Chapter 8, but instead provide a specific measurement for the clear floor space in the section dealing with alignment. Putting the requirement into the transfer shower section would be consistent.

This is not intended to be a technical change. It will allow the same alternatives provided for in the current text approved by the committee. This would address the concern that the increased clear floor space of 52", with leaving the dimension at 12", would force a wall offset. The range of alignment would allow for flexibility in design and is within the range that Dr. Steinfeld said was adequate for alignment for transfer. There will not be walls on both sides, because this location still has to meet the alcove provisions that require 60" for sideways movement. See the attached drawing for an example of the configuration options.

6-55-12
Agenda Item #28.1
Committee Action on Agenda Item #28.1 – comment number 6-55-12/3.1 – PC3.1 This comment was withdrawn by the Commenter.

6-55-12	
Agenda Item #28.2	
Committee Action on Agenda Item #28.2 – comment number 6-55-12/3.1 – PC 3.2	
Approved	
Reason: The Committee agreed with the reason provided by this Commenter. This comment restores the text that existed prior to the 2009 edition of the standard.	
Comment No: 6-55-12/3.1 – PC 3.2	Submitted by: Kim Paarlberg International Code Council
	<p>Further revise as follows:</p> <p>608.3.2.1 Back wall grab bar. In standard roll-in type showers, a grab bar shall be provided on the back wall beginning at the edge of the seat. The grab bars shall not be provided above the seat. The back wall grab bar shall extend the length of the wall and extend within 6 inches (150 mm) maximum from the adjacent side wall opposite the seat.</p> <p>Exceptions:</p> <ol style="list-style-type: none"> 1. The back wall grab bar but shall not be required to exceed 48 inches (1220 mm) in length. 2. The back wall grab bar is not required to extend within 6 inches (150 mm) of the adjacent side wall opposite the seat if it would require the grab bar length to exceed 48 inches (1220 mm) in length. <p>608.3.2.1. Back Wall Grab Bar. In standard roll-in shower stalls, a grab bar shall be provided along the entire length of the back wall from 6 inches (150 mm) maximum of one corner to within 6 inches (150 mm) maximum of the opposite corner.</p> <p>Exception: If a permanent seat is provided, the grab bar shall terminate at the leading edge of the seat.</p>

Comment Reason: This proposal is to restore the language from the 2009 A117.1 for the rear grab bar in a roll-in shower. The 2009 language addressed the concern of what to do with a roll in shower that is provided in a space larger than the minimum size. Issues with the approved language are as follows:

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

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

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

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

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

Seat requirements for roll-in showers are as follows:

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

EXCEPTIONS:

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

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

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

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

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

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

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

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

6-61-12
Agenda Item #30.1
Committee Action on Agenda Item #30.1 – comment number 6-61-12/1.2- PC2.1
The public comment was withdrawn by the Commenter.

6-61-12	
Agenda Item #30.2	
Committee Action on Agenda Item #30.2 – comment number 6-61-12/1.2 – PC2.2	
Disapproved	
Reason: Both this proposal and the one originally discuss under Agenda Item #30.1 address features that are in addition to the minimum accessibility requirements. The Committee was against adding text addressing additional or convenience features that are beyond the minimum in the standards. In the case of this item, the language is redundant with the base requirement that stipulates the controls go into a set prescribed area. The proposed #4 adds no new information.	
Comment No: 6-61-12/1.2 – PC2.2	Submitted by: Vincent Barrera New Mexico Governor’s Commission on Disability
	<p>Further revise as follows:</p> <p>608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall not be located above the seat. Controls and hand showers shall be located in accordance with the following:</p> <ol style="list-style-type: none"> 1. On the back wall, 2. At a height of 38 inches minimum and 48 inches (1220 mm) maximum above the shower floor, and 3. 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the wall behind the seat. 4. <u>Where a shower spray unit diverter is provided, it shall be located within the controls area by the seat.</u>
Comment Reason: When a roll-in shower has two shower heads a person with disabilities shall be able to select the shower head they prefer for standing or sitting or use both via diverter within reach of the controls.	

6-61-12	
Agenda Item #30.3	
Committee Action on Agenda Item #30.3 – comment number 6-61-12/1.2 – PC2.3	
Disapproved	
Reason: The Committee strongly supported maintaining the vertical grab bars. Such bars are not only extremely useful for persons with disabilities, they are also useful for the population in general.	
Comment No: 6-61-12/1.2 – PC2.3	Submitted by: Dan Bartz Kohler Company
	Further revise as follows: 608.3.2.2 Vertical Grab Bar. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, a vertical grab bar shall be provided. A vertical grab bar 18 inches (45 mm) minimum in length shall be provided on the ambulatory control side wall 3 inches (75 mm) minimum and 6 inches (150 mm) maximum above the horizontal grab bar, and 4 inches (100 mm) maximum inward from the front edge of the shower.
Comment Reason: We recommend that the proposed language for the requirement of a vertical grab bar be removed or withdrawn. We fail to see what purpose a vertical grab bar will serve, since in the above proposed language, the shower control and the hand held spray has been stricken and the same language has been struck from the 6-61-12 PC 1.4 proposal. Based on these changes a vertical grab bar on the wall opposite the seat wall within a roll-in shower seems totally inappropriate.	

7-1-12	
Agenda Item #35.1	
Committee Action on Agenda Item #35.1 – comment number 7-1-12/3.1 – PC3.1	
Approved	
<p>Reason: There was considerable debate whether the LRV was appropriate for detectable warnings. These features are generally outside where they are subject to weather extremes as well as dirt which will obscure the warnings. The measurement tool for the LRV received praise from committee members who already have to device and have used it in real world situations. But the ability to achieve and maintain a 70% contrast was not realistic. While ‘Federal yellow’ is often used for these features, there was concern that even Federal Yellow would achieve the 70%. Many on the committee spoke in favor of maintaining the LRV measurement for detectable warnings and in the standard overall. At the conclusion the committee voted to remove the LRV measurement from applying to detectable warnings for this edition of the standard.</p>	
<p>Comment No: 7-1-12/3.1 – PC1.4 Misnumbered – should have been PC3.1</p>	<p>Submitted by: Kim Paarlberg International Code Council</p>
	<p>Further revise as follows:</p> <p>705 Detectable Warnings</p> <p>705.3 Contrast. Detectable warning surfaces shall contrast visually with adjacent surfaces. The Light Reflectance Value (LRV) of the surfaces shall contrast 70 percent minimum, as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45 either light-on-dark or dark-on-light.</p>
<p>Comment Reason: The committee decided in 7-1-2 PC3 to take the visual contrast requirements off of stairways. There is even more of a concern with detectable warnings on curb cuts. What happens when there is snow, mud or rain? The language should be restored to the 2009 ICC A117.1 requirements.</p>	

7-1-12	
Agenda Item #35.2	
Committee Action on Agenda Item #35.2 – comment number 7-1-12/3.1 – PC3.2	
Disapproved	
<p>Reason: The discussion and motion was split into two parts. The first part was to consider adding the definitions to the standard. The second was to consider the revisions proposed in the balance of the standard.</p> <p>Part 1 – Definitions were disapproved because in the end the committee felt uncomfortable with the wording of the definition and further concern over copyright if they were copied directly to the A117.1. Since the standard is referenced, then the definitions will be included by reference.</p>	

Part II – Changes to the balance of the sections were also disapproved. There was concern that these were not strictly editorial. For example in Item 1 of Section 703.1.4, the removal of the words “including those” would change the meaning from all opaque paint to just some of the paints. The committee did direct the Editorial Task Group to consider changes that are strictly editorial.

<p>Comment No: 7-1-12/3.1 – PC1.4 Misnumbered – should have been PC3.2</p>	<p>Submitted by: Kim Paarlberg International Code Council</p>
	<p>Add new definitions as follows:</p> <p>106 Definitions</p> <p><u>ordinary materials:</u> a material which is not retroreflecting, fluorescent, phosphorescent, involves electrical power for light emission or is self-luminous</p> <p><u>multi-colored surfaces:</u> surfaces formed by distinct areas of different color, which when viewed from a maximum distance of 10 feet (3 m), remain distinct; or surfaces formed from small color specks, chips or tufts, which when viewed from a distance of 10 feet (3 m), assume the appearance of one color</p> <p>Further revise as follows:</p> <p>703 Signs</p> <p>703.1 General.</p> <p>703.1.1 Designations</p> <p>703.1.2 Directional and Informational Signs.</p> <p>703.1.3 Pictograms.</p> <p>701.1.2 703.1.4 Light Reflectance Value. The light reflectance value (LRV) of surfaces shall be determined in accordance with BS 8493 listed in Section 106.2.3 for the following surface types:</p> <ol style="list-style-type: none"> 1. Opaque paint coatings and paint systems, including those that cause extreme angular dependences of reflected light and those that have a surface texture of less than 2 mm. 2. Opaque coverings including those that cause extreme angular dependences of reflected light, and those that have an unyielding texture of less than 2 mm. 3. Opaque coverings with a yielding pile, e.g. <u>such as</u> carpet. 4. Opaque materials, including those that cause extreme angular dependences of reflected light, and those that have a texture of less than 2 mm, e.g. <u>such as</u> finished metals. 5. Opaque materials coated with non-opaque coatings or coverings, e.g. timber door coated with a woodstain, including those that cause extreme angular dependences of reflected light, and those that have a texture of less than 2 mm <u>such as timber door coated with a woodstain.</u>

6. Multi-colored surfaces.

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

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

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

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

Where

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

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

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

703.2 Visual Characters.

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

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

703.3 Raised Characters.

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

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

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

703.5 Pictograms.

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

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

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

703.6 Symbols of Accessibility.

703.6.2 Finish and Contrast. Symbols of accessibility and their backgrounds shall

	<p>comply with Sections 703.6.2.1 and 703.6.2.2.</p> <p>703.6.2.1 Nonglare Finish. The glare from coverings and the finish of symbols of accessibility and their backgrounds shall not exceed 19 as measured on a 60-degree gloss meter.</p> <p>703.6.2.2 Contrast. The Light Reflectance Value (LRV) of symbols of accessibility and their backgrounds shall contrast 70 percent minimum, as determined in accordance with Equation 7-4 <u>Section 703.1.5</u>. The lighter surface shall have a LRV of not less than 45.</p> <p>703.7 Variable Message Signs.</p> <p>703.7.10 Finish. The background of Low resolution VMS characters shall have a non-glare finish.</p> <p>703.7.11 Contrast. Low resolution VMS characters shall be light characters on a dark background.</p> <p>705 Detectable Warnings</p> <p>705.3 Contrast. Detectable warning surfaces shall contrast visually with adjacent surfaces. The Light Reflectance Value (LRV) of the surfaces shall contrast 70 percent minimum, as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45.</p> <p>707 Automatic Teller Machines (ATMs) and Fare Machines</p> <p>707.7.2 Characters Characters displayed on the screen shall be in a sans serif font. The uppercase letter "I" shall be used to determine the allowable height of all characters of the font. The uppercase letter "I" of the font shall be $\frac{3}{16}$ inch (4.8 mm) minimum in height. Characters shall contrast with their background with either light characters on a dark background, or dark characters on a light background.</p>
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Comment Reason: I believe this proposal is seriously broken and should be disapproved. What is suggested is the minimum for understanding, consistency and code language.

This section being under under the general scope for a chapter that deals with alarms, signs, telephones, detectable warnings, automatic teller machines, and two-way communication is very confusing. At the least this should be moved under general signage requirements.

I do not understand what "that cause extreme angular dependences of reflected light" is supposed to mean to the average enforcer?

This entire list is within the scope of the standard, so why repeat it here? Proposed is correct code language.

Based on the list in Item 1 through 5, instead of sending someone to the standard to get the definitions of multi-color material (which this proposal did not do) and ordinary material (which the proposal did do), they should be repeated here. Given the referenced standard definition for ordinary material, this definition does not say what it is!

While the items listed are the scope of BS 8493, they are listed here, so the reference in Section 701.1.3.1 should be to the list in ICC A117.1.

The current section 701.1.2.1 is redundant and not needed.

The list of section numbers where this is applied in 701.1.3 is not needed. We do not reference back and forth for a requirement. The correct reference in the sections would be to the section, not the equation number.

If this truly is supposed to be how we look at glare and contrast, why was this not included for raised characters, variable message signage and automatic teller and fare machines? This is addressed in a separate public comment.

Is this light reflectance value really going to work on a detectable warning on a sidewalk? What about when there is snow or dirt or rain? The committee took this out for stairways in a previous action. This is addressed in a separate public comment.

7-1-12

Agenda Item #35.3

Committee Action on Agenda Item #35.3 – comment number 7-1-12/3.1 – PC 3.3

Disapproved

Reason: One again the committee heard from experts on both sides of this issue. While there are concerns that the LRV is an inadequate measure of contrast, there is a reasonable cost device which is available for the measurement. Supporters again acknowledged that contrast isn't the only measure of a sign's clarity and readability, it is appropriate to consider and include in the standard. This provision would only be in the A117.1 standard and therefore only apply to the limited number of signs addressed in Section 1111 of the International Building Code. The concern that it would have wider application to other signs regulated under ADA was dismissed because this isn't being adopted into the ADAAG. The Committee has felt for years that the 'light on dark or dark on light' provisions found in the current standard are inadequate, therefore the Committee once again confirmed is approval of the LRV measurement and reference to the BS8493 standard.

Comment No:
7-1-12/3.1 – **PC1.4**
Misnumbered –
should have been
PC3.3

Submitted by:
Teresa Cox
International Sign Association

Delete standard as follows:

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

Further revise as follows

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

- ~~1. Opaque paint coatings and paint systems, including those that cause extreme angular dependences of reflected light and those that have a surface texture of less than 2 mm.~~
- ~~2. Opaque coverings including those that cause extreme angular dependences of reflected light, and those that have an unyielding texture of less than 2 mm.~~
- ~~3. Opaque coverings with a yielding pile, e.g. carpet.~~
- ~~4. Opaque materials, including those that cause extreme angular dependences of reflected light, and those that have a texture of less than 2 mm, e.g. finished metals.~~
- ~~5. Opaque materials coated with non-opaque coatings or coverings, e.g. timber door coated with a woodstain, including those that cause extreme angular dependences of reflected light, and those that have a texture of less than 2 mm.~~

6. Multi-colored surfaces.

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

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

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

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

Where

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

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

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

703.2 Visual Characters.

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

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

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

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

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

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

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

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

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

	<p>703.6.2.2 Contrast. The Light Reflectance Value (LRV) of symbols of accessibility and their backgrounds shall contrast 70 percent minimum, as determined in accordance with Equation 7-1. The lighter surface shall have a LRV of not less than 45.</p> <p>705.3 Contrast. Detectable warning surfaces shall contrast visually with adjacent surfaces, either light on dark or dark on light. The Light Reflectance Value (LRV) of the surfaces shall contrast 70 percent minimum, as determined in accordance with Equation 7-4.7-5. The lighter surface shall have a LRV of not less than 45.</p> <p>705.3.1 Contrast Value. The contrast between the LRVs of adjacent surfaces required by Section 705.3 shall be determined by Equation 7-5.</p> <p>Contrast = $[(B1-B2)/B1] \times 100$ percent Equation 7-5</p> <p>Where</p> <p>B1 = light reflectance value (LRV) of the lighter surface.</p> <p>B2 = light reflectance value (LRV) of the darker surface.</p>
<p>Comment Reason: ISA supports changes to the standard when those proposed changes are backed by empirical evidence and research. Very little research has been done on what makes signs legible and accessible.</p> <p>We disagree with the committee action on this proposal for many reasons. The British Standard cited by the proponent pertains to contrast with other architectural elements (stairway striping, doors, carpets, and walls), not to contrast on signs.</p> <p>Independent, empirical research is needed. ISA is working to identify potential funding sources for a scientific study to provide the Committee with a firm basis to change the standard.</p>	

7-1-12
Agenda Item #35.4
<p>Committee Action on Agenda Item #35.4 – comment number 7-1-12/3.1 – PC3.4</p> <p>This public comment was withdrawn by the commenter</p>

8-6-12	
Agenda Item #42.1	
Committee Action on Agenda Item #42.1 – comment number 8-6-12/1.1 – PC1.1	
Approved	
<p>Reason: The committee agreed with the proponent that the final sentence of Section 802.11.2 what going to potential affect placement of seats in an auditorium design. Such was not the intent of the original proposal. The original intent was to provide criteria for staging of sign language interpreters and not force restrictions on seating arrangement.</p>	
Comment No: 8.6.12/1.1 – PC 1.1	Submitted by: Kim Paarlberg International Code Council
	<p>Further revise as follows:</p> <p>802.11 Stage Lighting for Sign Language Interpreters (8-6-12 PC1)</p> <p>802.11 General. (no change)</p> <p>802.11.1 Area. (no change)</p> <p>802.11.2 Location. Sign language interpreter stations shall be located so that seating within an arc from the station and measured to the left and to the right 60 degrees within 65 feet (19.8 m) horizontal distance from the station is provided with sightlines providing a view of sign language station from a height of 36 inches (915 mm) to 72 (1830 mm) inches above the floor of the station. The vertical viewing angle from the person in the seat to the interpreter station shall not exceed 30 degrees measured to the front and center of the floor and center of the floor of the sign language station.</p> <p>802.11.3 Illumination: (no change)</p> <p>802.11.4 Backdrop. When a sign language interpreter station is located <u>with a permanent wall</u> less than 10 feet (3050 mm) in front of a permanent wall behind the sign language interpreter station, <u>the permanent wall</u> and to a height of 96 inches (2440 mm) from the finish floor shall be considered as a backdrop. The backdrop shall provide a flat, smooth surface with a monochromatic, low-luster finish treatment.</p> <p>Exception: The wall is not required to comply with Section 802.11.4 where a backdrop with a monochromatic, low luster finish treatment is provided.</p>

Comment Reason: The changes to Section 802.11.1 and 802.11.4 are for cleaner English, and perhaps can be considered editorial.

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

