



Codes & Safety Office

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November 23, 2015

California Building Standards Commission (CBSC)
2525 Natomas Park Drive, Suite 130
Sacramento, CA 95833
Attention: Jim McGowan, Executive Director
Fax (916) 263-0959
E-mail CBSC@dgs.ca.gov.

Re: PROPOSED CHANGES TO THE CALIFORNIA BUILDING CODE CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2 – ACCESSIBILITY PROVISIONS
Second 45-DAY EXPRESS TERMS FOR PROPOSED BUILDING STANDARDS OF THE DIVISION OF THE STATE ARCHITECT (DSA-AC)

Dear Mr. McGowan

The National Elevator Industry Inc. (NEII®) would like to thank you for accepting our comment on Item 11B.411.2.1.3.4 and making the proposed change to this section. We would like to clarify that our understanding of the final wording is correct. We understand the final requirement to read as follows when all the legislative format is removed and would appreciate confirmation of our understanding.

11B-411.2.1.3.4 Position. *Display screens and touch screens shall be positioned so glare is reduced on the screen. Keypads and buttons shall slope away from the user at 15 to 25 degrees from the vertical plane. Touch screens shall be sloped away from the user at 7 to 25 degrees from the vertical plane.*

NEII® submitted several other proposals (see attached) during rule development by the Access Committee and again during the initial comment period. We are re-submitting them now because we have not received any formal indication whether these proposals were considered during the previous stages of this process. NEII® respectfully requests the attached proposals and additional comments/proposals be reconsidered by the California Building Standards Commission (CBSC) and the Division of the State Architect (DSA-AC).

The CBSC Notice of Proposed Action concerning the 45-Day Express Terms states that “The DSA-AC has determined that no reasonable alternative considered by DSA-AC or that has otherwise been identified and brought to the attention of DSA-AC would be more effective in carrying out the purpose for which the action is proposed, or would be as effective as and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provisions of law.”

NEII® believes the following comments and the attached proposals submitted indeed meet one or more of the criteria for reasonable alternatives as noted in this statement.

NEII® Comment to Items 11B.30, 11B.31, and 11B.32

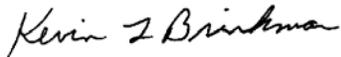
NEII® supports the changes to **11B-411.2.1.2.2 in Item 11B.30; 11B-411.2.1.2.4 in Item 11B.31; and 11B-411.2.1.2.5 in Item 11B.32.**

NEII proposals attached for consideration for this code cycle, DSA 65:

- [11B-411.2.]1.2.1; 1.6; 1.7; 1.7.2; 1.7.2.1; 2.2
- 11B-411.2.1.1
- 11B_411.2.1.2.4.3
- 11B-411.4.11
- 11B-411.4.11 (Additional proposal)
- 11B-411.4.11.1
- 11B-411.2.1.4.1.2
- 11B-411.2.1.5.1
- 11B_703.8.4

Thank you for your attention to this matter. Please feel free to contact me if you have any questions or if you would like to discuss our comments.

Sincerely,



Kevin L. Brinkman, PE
Code and Safety Director