



Codes & Safety Office

925 West Center Street • Eureka, IL 61530 • Office: 309.467.2379 • Cell: 309.208.0812

September 15, 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

Dear Mr. McGowan

The National Elevator Industry Inc. (NEII®) is committed and fully vested in providing convenient and accessible conveyances for the general public, including those with special accessibility needs. NEII® herewith submits its written comments with the referenced attachments for the **45-DAY EXPRESS TERMS FOR PROPOSED BUILDING STANDARDS OF THE DIVISION OF THE STATE ARCHITECT (DSA-AC)**

NEII® submitted several of the attached proposals during rule development by the Access Committee, but they were not accepted by the Committee and therefore not included in the 45-Day Express Terms. 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® comment to Item 11B.33

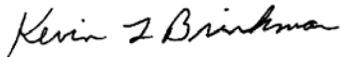
NEII® asks that the stated slope of “15 to 25 degrees” from the vertical plane be modified to allow the 7 to 25 degree slope that was struck from the requirement for the face of hall call consoles and touch screens. *Rationale: The 7 degree minimum will provide additional flexibility in positioning the screen to reduce glare and has not been cited as an issue by users under the current allowance of the code.*

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

DSA CODE AMENDMENT PROPOSAL

Rationale

Describe the existing problem to be addressed by the proposed amendment:

Describe how the proposed amendment addresses the existing problem:

Supporting Documentation

Identify each technical, theoretical, and empirical study, report, or similar document, if any, which supports the proposed amendment:

Economic/Fiscal Impact

Describe the types of facilities or businesses which may be impacted by the proposed amendment:

Estimate the cost of compliance with the proposed amendment (\$/installation, \$/building or facility, or total statewide cost):

Estimate the annual dollar value of the benefit from the proposed amendment (total statewide value):

Necessary Criteria – Answer YES, NO, or UNKNOWN to the following statements:

(YES, NO, or UNKNOWN)

The proposed building standard does not conflict with, overlap, or duplicate other building standards.

The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.

The public interest requires the adoption of the proposed building standard.

The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.

The cost to the public is reasonable, based on the overall benefit to be derived from the proposed building standard.

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Applicable national specifications, published standards, and model codes have been incorporated herein, where appropriate.

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DSA CODE AMENDMENT PROPOSAL

Notes: Submit only one code amendment item per form. Proposer's name and contact information are required. Submitted code amendment proposals become the property of the Division of the State Architect (DSA). DSA may utilize all, part, or none of the proposal. Additional pages may be attached and submitted with this form.

Contact Information	For DSA Use Only
Date:	Date Received:
Name (last name, first name):	DSA Tracking Number:
Affiliated Organization (if any):	
Phone Number (primary):	
Phone Number (secondary):	
Fax Number:	
Email Address:	
Mailing Address:	
City, State, Zip:	
	Applicable Code
	Applicable Code (CBC, CPC, etc.):
	Applicable Code Section(s):

Suggested Text of Proposed Amendment

Indicate proposed amendment in the context of existing code text. Use strikeout notation for text to be deleted and underline notation for text to be added.

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