



**MITA**<sup>®</sup>  
MEDICAL IMAGING  
& TECHNOLOGY ALLIANCE  
A DIVISION OF **NEMA**<sup>®</sup>

1300 North 17<sup>th</sup> Street • Suite 900  
Arlington, Virginia 22209  
Tel: 703.841.3200  
Fax: 703.841.3392  
www.medicalimaging.org

October 26, 2015

VIA EMAIL: [cbsc@dgs.ca.gov](mailto:cbsc@dgs.ca.gov)

State of California  
Government Operations Agency  
California Building Standards Commission  
2525 Natomas Park Dr., Suite 130  
Sacramento, CA 95833

Dear State of California Government Operations Agency:

The Medical Imaging & Technology Alliance (MITA) has been actively engaged in providing comments for changes in the 2016 California Building Code, Title 24. We are offering the following comments with respect to the Office of Statewide Health Planning and Development (OSHPD) 04/15: California Administrative Code, Part 1 and California Building Code Part 2, Title 24. Our comments and requests for clarification specifically address sections of the Express Terms (ET), Part 2, Volume 1&2. We trust the comments will provide valuable stakeholder input to OSHPD in their efforts to implement improvements and changes to the Building Code.

MITA is the leading organization and collective voice of medical imaging equipment and radiopharmaceutical manufacturers, innovators, and product developers. We represent companies whose sales comprise more than 90 percent of the global market for medical imaging technology. These modalities include these recognized hallmarks of modern medicine: medical X-ray equipment, computed tomography (CT) scanners, ultrasound, magnetic resonance imaging (MRI), positron emission technology (PET), radiopharmaceuticals and radiation therapy devices.

### **Proposed Code Changes on Components Requiring Special Seismic Certification**

#### **Radiography and Fluoroscopy**

MITA appreciates OSHPD response, received on September 14, 2015, to our April comments. The response clarified that “radiographic equipment used for Interventional Radiology and Treatment, such as those used in Hybrid Operating Room (OR), will not require special seismic certification. MITA would like further clarification as to whether operating tables which are part of radiographic equipment used for Interventional Radiology and Treatment, but exclusively sold as part of the interventional system (and never stand-alone), are excluded from special seismic certification as well. We also ask for the same clarification regarding motorized operating table systems. If not, industry would request such exclusion.

**Certificate of Compliance**

MITA recognizes that Sections 1705A.13.2 and 1705A.13.3 of the Express Terms require a certificate of compliance to be submitted to building officials “for the manufacturer’s certification of non-structural components, supports and attachments”. We appreciate OSHPD response to our comments, but seek further clarification on the logistical acquisition of this certificate. MITA would like to know if OSHPD will issue certificates of compliance or if manufacturers need to provide a written document declaring compliance to the aforementioned sections. Further clarification of the new “manufacturer’s certification” language is also needed as the requirements of such a certification are not mentioned.

**Special Inspection of Fabricator’s Shop**

MITA asks for further clarification of Section 1704A.2.5 as it is unclear if OSHPD considers the manufactured equipment to be “fabricated items” subject to this special inspection.

\*\*\*

Thank you for this opportunity to participate in the public comment period for proposed actions in the 2016 California Building Standards Code, Title 24. We would be pleased to discuss or answer any questions you might have about these comments. Please do not hesitate to contact Cassandra Ricci ([cricci@medicalimaging.org](mailto:cricci@medicalimaging.org)) in my office if MITA can be of assistance.

Sincerely,



Patrick Hope  
Executive Director