

From: Inlays - Gregg [mailto:gregg@INLAYSINC.com]
Sent: Thursday, May 26, 2011 8:26 AM
To: CBSC (General Mail)
Subject: CCR, Title 24, Proposed Public Pool Regulations, Public Comment Period

To: California Building Standards Commission
Attn: Dave Walls, Executive Director

Inlays Inc. is the leading manufacturer of depth markers in North America. It is in this area that I am offering our expertise regarding the Proposed Public Pool Regulations, Title 24. We are well versed in all of the state codes pertaining to depth markers. We know which codes work well and which ones do not. We see verbiage that works well and those that are unclear. We believe we are experts in this area and are offering to lend our services to making the depth marker (Section 3110B) portion of Title 24 clear and concise. After reading the Title 24 Proposed Public Pool Regulations, we found several areas of concern.

A) 3110B.4.2 Location: We don't understand why a 20' pool width has anything to do with whether you need deck depth markers or not. Depth markers should be required on the deck regardless of pool width.

B) 3110B.4.3 Tolerance: Typically, most state codes and the APSP look for water depth to be accurate to the nearest 3 inches at normal operating water level when measured 3 feet from the pool wall (to eliminate the cove radius of the wall/floor intersection).

C) 3110B.4.4 Size of Markers: 48 out of 50 states require minimum 4" numerals on their depth markers. Virginia requires 5" minimum and California requires 3" minimum. If you are not going to require deck depth markers on pools less than 20' in width, shouldn't the numerals on the waterline be 4" minimum for readability? Currently there is no depth marker manufacturer in the United States that makes a 3" numeral depth marker as a standard item. All standard manufactured depth markers have 4" numerals minimum.

D) Also, there is no mention of needing an "FT" or "IN" after the depth numeral. By just having a numeral on the tile leaves too much open to interpretation. If the tile has a number "3" on it without a designation, does it mean 3 feet, inches, meters, or lane 3? It makes a big difference if you are an international traveler and are about to dive into the hotel pool you are staying at. We also believe that if you are going to have a designation, that it be "3FT or 6IN", not "3' or 6'". Not everyone knows what the hash marks mean.

E) We find it puzzling that there is no mention of any No Diving markers or No Diving symbols anywhere in this proposed code other than Section 3120B under Required Signs. While we agree on the sign requirement, we also feel that No Diving markers should be addressed in Section 3110B Permanent Markings. We feel that they should be required on the pool deck in areas of the pool where the depth is 5 feet or less. The APSP agrees with us as well as nearly every other state code.

On July 16, 2007, I read the Title 24 Proposed Pool Regulations (July 2003 edition) that Glenn Takeoka was working on and gave him similar suggestions. The Proposed Pool Regulations back then were taking into account of some of the suggestions I am making now. It appears they may have been lost on the

way to this current edition of the Proposed Pool Regulations or just have fallen out of favor. We also sent samples of different depth marker examples to Glenn Takeoka to use for decision making.

Please contact me if you would like to discuss this further or have us involved in any way.

Sincerely,

Gregg Kollross



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