

SFM Part 2.5

WDMAR327



WINDOW & DOOR
MANUFACTURERS ASSOCIATION

WDMA

FAX COVER

DATE: November 16, 2009

TO: California Building Standards Commission

FAX: 916-263-0959

FROM: Window & Door Manufactures Association

SUBJECT: Office of the State Fire Marshal - 2nd 45-day NOPA response
2010 CBC Amendment Ccmmnts
2010 CRC Amendment Ccmmnts

Pages + cover= 5

Please see attached comments submitted on behalf of the Window and Door Manufacturers Association.

Thank you.

SFM Part 2.5

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: BSC@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED OCTOBER 2, 2009
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: NOVEMBER 16, 2009

Date: November 13, 2009

From:

Jeff Inks (202-367-1217 / jink@wdma.com)
Name (Print or type)


(Signature)

Window and Door Manufacturers Association

Agency, jurisdiction, chapter, company, association, individual, etc.

2025 M Street, NW Washington, DC 20036

Street

City

State

Zip

I/We (do)(do not) agree with:

The Agency proposed modifications As Submitted on Section No. R327.8.3 and R327.8.3.1

and request that this section or reference provision be recommended:

Approved Disapproved Held for Further Study Approved as Amended

SEE NEXT PAGE

Suggested Revisions to the Text of the Regulations:

SECTION R327.8
EXTERIOR WINDOWS AND DOORS

Subsections R327.8.1 - R327.8.2.2 remain unchanged

R327.8.3 Non-glazed Exterior doors. Exterior doors shall comply with one of the following:

1. The exterior surface or cladding shall be of noncombustible or Ignition-resistant material, or
2. Shall be constructed of solid core wood having stiles and rails not less than 1 3/8 inches thick with interior field panel thickness no less than 1 1/4 inches thick, or
3. Shall have a fire-resistance rating of not less than 20 minutes when tested according to NFPA 252.

~~Exception: Solid doors having a fire-resistance rating of not less than 20 minutes may have untested glazing that complies with Section R327.8.2.~~

4. Shall be tested to meet the performance requirements of standard SFM Standard 12-7A-1.

Exception: Non-glazed doors that meet the requirements of section R327.8.3 may contain glazing that meets the requirements of section R327.8.2.1.

~~**R327.8.3.1 Exterior door glazing.** Glazing in exterior doors shall comply with Section 708A.2.1.~~

Reason:

- 1) Adding "Non-glazed" to the title of subsection 708A.3 clarifies the intent of the applicability of the subsection and in a way that is consistent with the terminology used in the title of subsection 708A.2.2.
- 2) Deleting the exception to item "3." under 708A.3 ("Solid doors having a fire-resistance rating of not less than 20 minutes may have untested glazing that complies with Section 708A.2.") is recommended in accordance with the requirements of CA Health and Safety Code §18930 (a)(1) because the exception creates a conflict with the requirements of NFPA 252 which the exception is intended to apply to.

Allowing the installation of untested glazing in a door assembly that has been tested and approved in accordance with NFPA 252 nullifies the test and rating because the assembly has not been tested with the untested glazing installed in it.

Section 1.3.4 of NFPA 252 states "Any variation from, or change to, the construction or conditions of the door assembly as tested can change the performance characteristics of the fire door assembly."

As such, if the exception is exercised, the door is no longer rated in accordance with NFPA 252, can no longer be labeled as such, and no longer meets the requirements of 708A.3.

Allowing the exception to remain creates an unavoidable and unintended conflict in the code. It should be amended out.

- 3) Adding the new exception to subsection 708A.3 and deleting subsection 708A.3.1 is recommended in companion to adding "Non-glazed" to the title of subsection 708A.3. The proposed exception maintains the provisions of 708A.3.1, but adds clarity to the applicability of it.