Office Use Item No. _____

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
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PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 31, 2012
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 15, 2012

Date: September 20, 2012

From: Ken Brenden Ken Brenden Digitally signed by Ken Brenden DN: cn=Ken Brenden, o=AAMA, ou, email=kbrenden@aamanet.org, c=US Date: 2012.09.28 07:28:52 -05'00'
Name (Print or type) (Signature)

The American Architectural Manufacturers Association
Agency, jurisdiction, chapter, company, association, individual, etc.

1850 Walden Office Square, Suite 550 Schaumburg, IL 60173
Street City State Zip

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

[X] The Agency proposed modifications As Submitted on Section No. *2410.1.1 Design*

and request that this section or reference provision be recommended:

[ ] Approved [ ] Disapproved [ ] Held for Further Study [X] Approved as Amended

Suggested Revisions to the Text of the Regulations:

2410.1.1 Design. *Design of Structural Sealant Glazing (SSG) shall satisfy the following requirements:*

1. *SSG shall be waterproof and serviceable as defined in AAMA 501.4 under design story drifts associated with the Design Earthquake and no glass fallout shall occur at the drifts determined by ASCE 7 Section 13.5.9~~.1~~ and tested in accordance with AAMA 501.4 Section 11.3.*

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:

(1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.

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

(3) The public interest requires the adoption of the building standards.

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

(5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.

(6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.

(7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.

(A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.

(B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.

(8) The format of the proposed building standards is consistent with that adopted by the commission.

(9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.

Rationale:

(1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.

The proposed building standard conflicts with ASCE 7-10, which does permit engineering analysis for the determination of seismic drift limit.

(3) The public interest requires the adoption of the building standards.

As the Standard Developing Organization (SDO) that developed the referenced AAMA publications, we are submitting this comment to clarify the appropriate application of AAMA 501.4 and 501.6 and to help ensure consistency with ASCE 7 Section 13.5.9. Specifically our proposed revisions do the following:

- Clarify that the definition of serviceability from AAMA 501.4 is to be used in the application of Section 2410.1.1.
- Clarifies that the testing criteria of AAMA 501.4 Section 11.3 is to be used for determining glass fallout
- Clarify that AAMA 501.4 and AAMA 501.6 provide the seismic drift capability of the systems in question
- Permit engineering analysis as an alternative to testing, consistent with ASCE 7 Section 13.5.9.
- Section 2403.2 ***Glass Supports*** allows engineering analysis by a registered design professional in lieu of testing.

When alternative sealants are determined to be equivalent through standard, accepted engineering analysis, whole system testing should not be required.

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

Requiring testing of all SSGs is unreasonable and arbitrary, since no technical justification for it has been provided at all.

5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.

The cost to the public of this additional testing being required is NOT reasonable, given that no overall benefit has been demonstrated. Regardless of who bears the initial cost for the testing, eventually its get passed down to those who will be occupying and using the buildings.

(7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.

The applicable published standards (ours) have been incorporated, but not necessarily appropriately.