

Petition for Declaratory Statement before the Florida Building Commission

November 2, 2010

FLORIDA BUILDING COMMISSION  
FLORIDA DEPARTMENT OF COMMUNITY AFFAIRS  
2555 SHUMARD OAK BLVD.  
TALLAHASSEE, FLORIDA, 32399-2100  
ATTENTION: MS. PAULA FORD, AGENCY CLERK

DEAD-DEC-217  
FILING AND ACKNOWLEDGEMENT  
FILED, on this date, with the designated  
Clerk, receipt of which is hereby  
acknowledged.  
*Paula P. Ford* 11/1/10  
Paula P. Ford Date  
Commission Clerk

RE: Sections 1714.5.4.1, 102.4 and AAMA 506-06, Voluntary Specifications for Hurricane Impact and Cycle Testing of Fenestration Products found in Chapter 35 of the 2007 Florida Building Code.

Mr. Mo Madani, CBO, EIT  
Planning Manager  
Department of Community Affairs

On behalf of the American Architectural Manufacturers Association [ AAMA ], a Product Certification Agency and a Product Validation Entity, Approved by the Florida Building Commission.

AAMA realizes that some products are being Evaluated outside the scope of AAMA 506-06 and therefore a clarification and interpretation is requested for language found in Section 1714.5.4.1 and Section 102.4 as it pertains to AAMA 506-06, Voluntary Specifications for Hurricane Impact and Cycle Testing of Fenestration Products.

Assertions:

When an AAMA Certified manufacturer has a product tested to AAMA 506-06 for submission to the Florida Product Approval System, and AAMA 506-06 specifically states that the product must be tested in the substrate used for installation will the manufacturer be allowed to provide an Evaluation that is outside the scope of AAMA 506-06? { note that AAMA-08 will allow the substitution of anchors and different substrates to be engineered}.

AAMA 506-06 reads in part:

**Florida Building Code-Building Chapter 35:**

**“AAMA 506-06, Voluntary Specifications for Hurricane Impact and Cycle Testing of Fenestration Products.**

**Section:**

**7.0 TEST SPECIMEN PREPARATION**

7.1 Test specimen shall be mounted using anchors and anchor spacing for which approval is desired. To qualify more than one anchor type, at least one of the test samples must be tested with that anchor and its appropriate framing material (i.e. wood, masonry, etc.).” (underline added for clarity)

Additionally the Florida Building Code-Building reads in part:

In the 2007 FBC-Building, Section 1714.5.4.1 states:

**“Section 1714.5.4.1 Anchoring requirements.** Window and door assemblies shall be anchored in accordance with the published manufacturer’s recommendations to achieve the design pressure specified. Substitute anchoring systems used for substrates not specified by the fenestration manufacturer shall provide equal or greater anchoring performance as demonstrated by accepted engineering practice.” (underline added for clarity)

This leads to the question: Would the manufacturer have to comply with the standard [ which appears to be more restrictive] or would the manufacturer be allowed to comply with the code through “engineering practice?”

In Addition the Florida Building Code-Building reads in part:

In Chapter 1 of the FBC-Building, Section 102.4 states:

**“Section 102.4 Referenced codes and standards.** The codes and standards referenced in this code shall be considered part of the requirements of this code to the prescribed extent of each such reference. Where differences occur between provisions of this code and referenced codes and standards, the provisions of this code shall apply.” (underline added for clarity)

This could lead to an assumption that the manufacturer could submit engineering for the installation of the product into different substrates (as referenced in 1714.5.4.1) which would appear to be less restrictive than the standard.

Therefore AAMA respectfully submits that the Florida Building Commission consider this request for a Declaratory Statement to clarify this issue.

***Question: Does the Florida Building Code allow the Manufacturer through engineering practice to submit additional information that will allow the***

**substitution of anchors and installation into different substrates for a product submitted using the Certification Method and using AAMA 506-06?**

Dwight S. Wilkes

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