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Department of Business and Professional Regulation	
Deputy Agency Clerk	
CLERK	Brandon Nichols
Date	1/14/2013
File #	

January 14, 2013

Mr. Mo Madani, CBO, Manager
Florida Department of Business and Professional Regulation
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399

DS 2013-001

RE: Request for Declaratory Statement from the Florida Building Commission "the Commission" regarding section R311 of the Florida Building Code, Residential.

Dear Mr. Madani;

Thanks for your input this week on my previous letter concerning Winder Tread Designs. I appreciate your time and discussion on my concerns on stair tread definitions and clarifications on diagrams of stair designs.

I have attached for the Commissions review, a stair design that we are considering for a future residential project, please refer to **Diagram A** below.

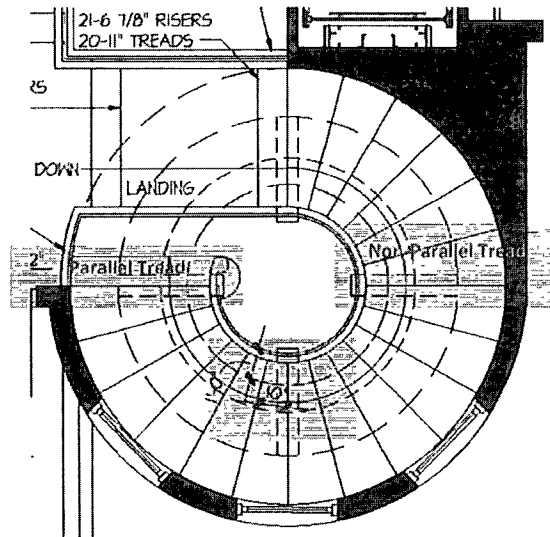


Diagram A

This stair is composed of Non-Parallel and Parallel Treads; I have highlighted this in blue for your review. At the Walkline of this stair, as noted on **Diagram A** and also highlighted in blue for your review, is the minimum 10" Tread Width per Florida Building Code.

My question to the Commission, is since this stair design as shown in **Diagram A**, meets the guidelines of the Florida Building Code Sections **R311.7.1** through **R311.7.8** is it also required, in addition, to meet Florida Building Code Section **R311.9.3** of which, by definition, it is not.

My contention is that since the stair design has both non-parallel treads and parallel treads, and also meets the Walkline definition as stated in the Florida Building Code, **Section R311.7.3**, as 12" in from the inside edge of the stair with a minimum tread width, **Section R311.7.4.2**, of 10" plus nosing (as shown and highlighted on the stair **Diagram A** above) that the stair design by definition meets the code. Furthermore, these sections, R311.7.1 through R311.7.8, take precedent over any other definition of stair tread sizing.

Thank you again for your time and review. If you have any questions or comments on the above, please contact me at your convenience. I look forward to your response.

Very truly yours,



Ken Rich
Architect

KER:cdl