

**FILED**

Petition for Declaratory Statement  
G.B. Collins Engineering, P.A.

Department of Business and Professional Regulation

Deputy Agency Clerk

CLERK Brandon Nichols

Date 5/23/2018

File #

**PETITION FOR DECLARATORY STATEMENT  
BEFORE THE FLORIDA BUILDING COMMISSION**

**Petitioner:**

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Petitioner G.B. Collins Engineering, P.A. ("Petitioner"), by and through its undersigned legal counsel, hereby requests a declaratory statement from the Florida Building Commission (the "Commission") and as grounds therefore states the following:

**I. CODE PROVISION IN QUESTION**

**DS 2018-040**

**Florida Building Code, 6th Edition (2017)**

**Chapter 4 – Special Detailed Requirements based on Use and Occupancy**  
**Section 454 – Swimming Pools and Bathing places (Public and Private)**

**454.1 Public swimming pools and bathing places.**

**454.1.6 Plumbing systems.**

**454.1.6.1 Sanitary facilities.**

**454.1.6.1.1 Required fixtures.**

Fixtures shall be provided as indicated on Table 454.1.6.1. The fixture count on this chart is deemed to be adequate for the pool and pool deck area that is up to three times the area of the pool surface provided. When multiple fixture sets are required and separate facilities are provided for each sex, the fixtures used in ancillary family-style restrooms can be used to meet the requirements of this section.

One diaper changing table shall be provided at each restroom. Diaper changing tables are not required at restrooms where all pools served are restricted to adult use only. Swim diapers are recommended for use by children that are not toilet trained. Persons that are ill with diarrhea cannot enter the pool.

**Exception:** When a public swimming pool meets all of the following conditions the following shall apply:

1. The pool serves only a designated group of dwelling units,
2. The pool is not for the use of the general public, and
3. A building provides sanitary facilities;

The fixture requirement for the building shall be determined and if it exceeds the requirement in Table 454.1.6.1 then the building requirement shall regulate the fixture count, otherwise the fixture count shall be based on the requirement for the pool. Under no circumstances shall the fixture counts be cumulative.

An additional set of fixtures shall be provided in the men's restroom for every 7,500 square feet ( $697 \text{ m}^2$ ) or major fraction thereof for pools greater than 10,000 square feet ( $929 \text{ m}^2$ ).

Women's restrooms shall have a ratio of three to two water closets provided for women as the combined total of water closets and urinals provided for men.

Lavatory counts shall be equal.

## II. ADDITIONAL RELEVANT CODE PROVISIONS

**Florida Building Code, 6th Edition (2017)**  
**Chapter 4 – Special Detailed Requirements based on Use and Occupancy**  
**Section 454 – Swimming Pools and Bathing places (Public and Private)**

**454.1 Public swimming pools and bathing places.**

**454.1.6 Plumbing systems.**

**454.1.6.1 Sanitary facilities.**

Swimming pools with a bathing load of 20 persons or less may utilize a unisex restroom. Pools with bathing loads of 40 persons or less may utilize two unisex restrooms or meet the requirements of Table 454.1.6.1. Unisex restrooms shall meet all the requirements for materials, drainage and signage as indicated in Sections 454.1.6.1.1 through 454.1.6.1.4. Each shall include a water closet, a diaper change table, a urinal and a lavatory. Pools with a bathing load larger than 40 persons shall provide separate sanitary facilities labeled for each sex. The entry doors of all restrooms shall be located within a 200-foot (60 960 mm) walking distance of the nearest water's edge of each pool served by the facilities.

**Exception:** Where a swimming pool serves only a designated group of residential dwelling units and not the general public, poolside sanitary facilities are not required if all living units are within a 200-foot (60 960 mm) horizontal radius of the nearest water's edge, are not over three stories in height unless serviced by an elevator, and are each equipped with private sanitary facilities.

**TABLE 454.1.6.1**  
**PUBLIC SWIMMING POOL—REQUIRED FIXTURE COUNT**

<b>SIZE OF POOL (square feet)</b>	<b>MEN'S RESTROOM</b>			<b>WOMEN'S RESTROOM</b>	
	<b>Urinals</b>	<b>WC</b>	<b>Lavatory</b>	<b>WC</b>	<b>Lavatory</b>
0 – 2,500	1	1	<b>1</b>	1	1
2,501 – 5,000	2	1	1	5	1
5,001 – 7,500	2	2	2	6	2
7,501 – 10,000	3	2	3	8	3

For SI: 1 square foot = 0.0929 m<sup>2</sup>.

**454.1 Public swimming pools and bathing places.**

**454.1.1.1 Sizing**

The bathing load for conventional swimming pools, wading pools, interactive water features, water activity pools less than 24 inches (610 mm) deep and special purpose pools shall be computed on the basis of one person per 5 gpm (0.32 L/s) of recirculation flow. The bathing load for spa type pools shall be based on one person per each 10 square feet (0.9 m<sup>2</sup>) of surface area. The filtration system for swimming pools shall be capable of meeting all other requirements of these rules while providing a flow rate of at least 1 gpm (0.06 L/s) for each living unit at transient facilities and 3/4 gpm (0.04 L/s) at nontransient facilities. Recreational vehicle sites, campsites and boat slips designated for live-aboards shall be considered a transient living unit. For properties with multiple pools, this requirement includes the cumulative total gpm of all swimming pools, excluding spas, wading pools and interactive water features. All other types of projects shall be sized according to the anticipated bathing load and proposed uses. For the purpose of determining minimum pool size only, the pool turnover period used cannot be less than 3 hours.

### III. APPLICABLE CODE DEFINITIONS

**454.1 Public swimming pools and bathing places.**

**454.1.1 Flood hazard areas.** \*Note that this subsection also contains definitions applicable to Section 454.1

**“Bathing load”** means the maximum number of persons allowed in the pool or bathing place at one time.

A **“public swimming pool” or “public pool”** means a watertight structure of concrete, masonry, or other approved materials which is located either indoors or outdoors, used for bathing or swimming by humans, and filled with a filtered and disinfected water supply, together with buildings, appurtenances, and equipment used in connection therewith. A public swimming pool or public pool shall mean a conventional pool, spa-type pool, wading pool, special purpose

pool, interactive water feature or water recreation attraction, to which admission may be gained with or without payment of a fee and includes, but is not limited to, pools operated by or serving camps, churches, cities, counties, day care centers, group home facilities for eight or more clients, health spas, institutions, parks, state agencies, schools, subdivisions, or the cooperative living-type projects of five or more living units, such as apartments, boardinghouses, hotels, mobile home parks, motels, recreational vehicle parks, and townhouses. The term does not include a swimming pool located on the grounds of a private residence.

**“Spa pool”** means a pool used in conjunction with high-velocity air or water.

**“Wading pool”** means a shallow pool designed to be used by children.

**“Water recreation attraction”** means a facility with design and operational features that provide patron recreational activity and purposefully involves immersion of the body partially or totally in the water. Water recreation attractions include water slides, river rides, water course rides, water activity pools, interactive water features, wave pools and any additional pool within the boundaries of the attraction.

**“Water activity pool”** means a water recreation attraction which has water-related activities such as rope ladders, rope swings, cargo nets and other similar activities.

**“Interactive water features”** means a structure designed to allow for recreational activities with recirculated, filtered, and treated water; but having minimal standing water. Water from the interactive fountain type features is collected by gravity below grade in a collector tank or sump. The water is filtered, disinfected and then pumped to the feature spray discharge heads. The collector tank and water filtration features required make this structure a type of public swimming pool.

#### **454.1 Public swimming pools and bathing places.**

##### **454.1.9 Water recreation attractions and specialized pools.**

###### **454.1.9.8 Interactive water features (IWFs).**

###### **454.1.9.8.1**

Waters discharged from all fountain or spray features shall not pond on the feature floor but shall flow by gravity through a main drain fitting to a below or collection system which discharges to a collector tank. The minimum size of the collector tank shall be equal to the volume of 3 minutes of the combined flow of all feature pumps and the filter pump. Smaller tanks may be utilized if hydraulically justified by the design engineer. Adequate access shall be provided to the sump or collector tank. Stairs or a ladder shall be provided as needed to ensure safe entry into the tank.

#### IV. QUESTION

For the following prospective projects, whether the proposed interactive water features (“IWFs”) should be considered when calculating the “size of pool” for purposes of determining the type and number of fixtures for sanitary facilities at the subject public pool pursuant to Section 454.1.6.1.1 of the FBC, where each project will also contain a swimming pool?

##### Prospective Projects:

(1) *Watergrass Project*

Swimming Pool = 1,330 square feet

IWF = 1,256 square feet<sup>1</sup>

(2) *Sand Lake Sound Project*

Swimming Pool = 1,060 square feet

IWF = 2,490 square feet<sup>2</sup>

#### V. ISSUE

Petitioner is a professional design engineer (“P.E.”) who has been in business for over 45 years and has been responsible for the design of hundreds of commercial swimming pools throughout the State of Florida. Accordingly, Petitioner is considering undertaking the two foregoing projects that involve both swimming pools and IWFs and, therefore, this issue substantially affects Petitioner.

If the IWFs’ square footage were to be included in the “size of pool” calculation, it would bump the pool size into a different category that would require additional fixtures to be built. Requiring additional fixtures would cause an increase in the sanitary facility square footage and water consumption, which would have significant widespread effects, including without limitation, increasing impervious areas, storm sewers, parking spaces, and plumbing and HVAC needs. The inclusion of IWFs in the fixture calculation places an inordinate hardship on not only the Petitioner and others in Petitioner’s position, but also the owner, contractors, subcontractors, design professionals, consultants, and all others involved in such a project.

#### VI. ANALYSIS

**A. *The Code excludes spa pools, wade pools, and IWFs from the sizing calculation for public pools when a property contains “multiple pools.”***

Section 454.1 of the FBC provides special detailed requirements based on use and occupancy for public pools only. Section 454.1.6.1 dictates whether additional sanitary facilities must be constructed specifically for use by persons at a public pool and governs the number of such additional facilities and whether they shall be designated as men’s, women’s, or unisex restrooms. Moreover, Section 454.1.6.1.1 provides the type and number of fixtures that must be included within a given sanitary facility. Generally, such fixtures “shall be provided as indicated in Table 454.1.6.1,” (the “Table”), which Table’s placement in the Code is directly in between the

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<sup>1</sup> See prospective plan for the Watergrass Project attached as **Exhibit “A.”**

<sup>2</sup> See prospective plan for the Sand Lake Sound Project attached as **Exhibit “B.”**

provision for sanitary facilities and the provision for required fixtures. The Table indicates that the required fixtures are to be determined based on the “size of [the] pool,” which is measured by square feet (sq. ft.). Depending on which of the four categories the size of the pool falls into determines the number of urinals, water closets, and lavatories required in both the men’s and women’s restrooms. For instance, if the size of the pool is 2,500 sq. ft. or less, only one water closet is required in the women’s restroom and only one urinal in the men’s. However, just one additional sq. ft. included in the calculation increases the requirement to five (5) water closets in the women’s restroom and two (2) urinals in the men’s.

Furthermore, only one place in Chapter 4 of the FBC provides a calculation for determining the size of a public pool—Section 454.1.1.1 **Sizing**. The Table commands that the fixtures required in sanitary facilities be determined by the size of the pool (based on square footage); however, it provides zero guidance as to the items that should be included in the measurement of such square footage calculation. As such, Section 454.1.1.1’s rules governing the calculation of pool size must be utilized in order to accurately calculate the “size of pool” for purposes of determining pool fixture requirements. Other than providing the guidelines for calculating the bathing load for a pool, Section 454.1.1.1 dictates that **for properties with multiple pools, “spas, wading pools[,] and interactive water features”** shall be specifically excluded from the calculation of the size of the pool.

Because “[a] public swimming pool or public pool shall mean a conventional pool, spa-type pool, wading pool, special purpose pool, interactive water feature or water recreation attraction,” whenever a property possesses more than one of the foregoing, it contains “multiple pools” as envisioned by Section 454.1.1.1. Therefore, when an IWF is planned to be constructed alongside a conventional pool, the IWF is **not** to be considered in the calculation of the size of the pool.

In conclusion, the square footage of the conventional pool should be the only square footage calculated for purposes of determining the “size of pool.” Any additional spa pool, wade pool, and/or IWF contemplated should not be included in the calculation of the “size of pool”; and therefore, should have no impact on the sanitary facility fixtures required.

***B. The inclusion of IWFs in the calculation of the “size of pool” is illogical and inconsistent with the Code’s purpose to promote health and safety.***

A pool’s “bathing load” is defined as “the maximum number of persons allowed in the pool or bathing place at one time.”<sup>i</sup> A “public swimming pool” or “public pool” is defined as “mean[ing] a watertight structure of concrete, masonry, or other approved material which is located either indoors or outdoors, used for bathing or swimming by humans, and filled with a filtered and disinfected water supply, **together with buildings, appurtenances, and equipment used in connection therewith.**”<sup>ii</sup> Furthermore, under “pool appurtenances,” the FBC includes decks and walkways, which includes wet decks, as well as the fence or barrier surrounding the pool area.<sup>iii</sup> In other words, the bathing load indicates the maximum number of persons allowed in the entire pool area, not just in the water. Furthermore, when calculating the bathing load, IWFs are not to be included in such calculation if they accompany a conventional swimming pool on the same property—the “multiple pool” exception.

As such, increasing the “size of pool” calculation to account for the square footage of an IWF serves no purpose and would have absolutely no beneficial impact because the inclusion of an IWF does not add to the bathing load, nor the number of persons permitted in the general pool area (which includes the IWF). Simply put, it is counterintuitive to require additional restroom fixtures when additional people will not be permitted to use such restrooms—the added restrooms would be rendered superfluous. Such an interpretation would create an increase in the cost of construction of the extra fixtures, increased utility costs, and increased water consumption by the property, yet would not provide any benefit to the health and/or safety of the bathers, in direct contradiction of the purpose of the Code.

Moreover, an unnecessary increase in the size of a given pool restroom would directly affect an entire project. Specifically, the building’s requirements for HVAC, plumbing, electrical, parking spaces, and green space would be potentially impacted significantly. The foregoing are all needless expenses that would be borne by the owner of the pool, and ultimately by those persons who enjoy the use of same.

In conclusion, because IWFs are not to be considered for purposes of calculating bathing load (i.e., the maximum number of persons allowed in the pool area) in combination with a conventional pool, requiring additional fixtures simply because an IWF is present is in direct contradiction of the Code.

Respectfully submitted,



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On Behalf of:

G. B. COLLINS ENGINEERING, P.A.

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<sup>i</sup> See Section 454.1.1, FBC.

<sup>ii</sup> See Section 454.1.1, FBC (emphasis added).

<sup>iii</sup> See Sections 454.1.3 and 454.1.3.1, FBC.

# **Exhibit “A”**



# **Exhibit “B”**

# SAND LAKE SOUND

## SWIMMING POOL & I.W.F.

6898 SAND LAKE SOUND RD.  
ORLANDO, FLORIDA 32256  
ORANGE COUNTY

GB Collins Engineering PA  
Certificate of Authorization 27934

For:

OVIDA  
Adventure Group Inc.

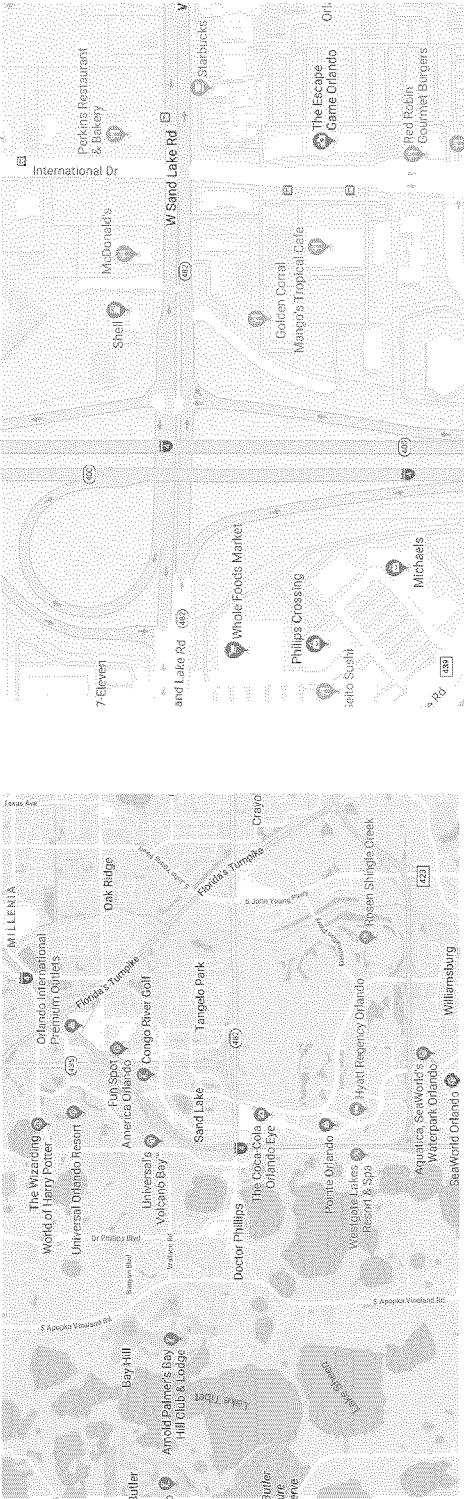
Sand Lake Sound  
American Pool &  
Innertube Water Feature (I.W.F.)

Cover

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Rickard M Terminal PE 61839  
Samuel A. Liberman PE 55740

#	Revision	Date

Date: 4/30/18  
Drawn by: JP



### PROJECT LOCATION MAPS

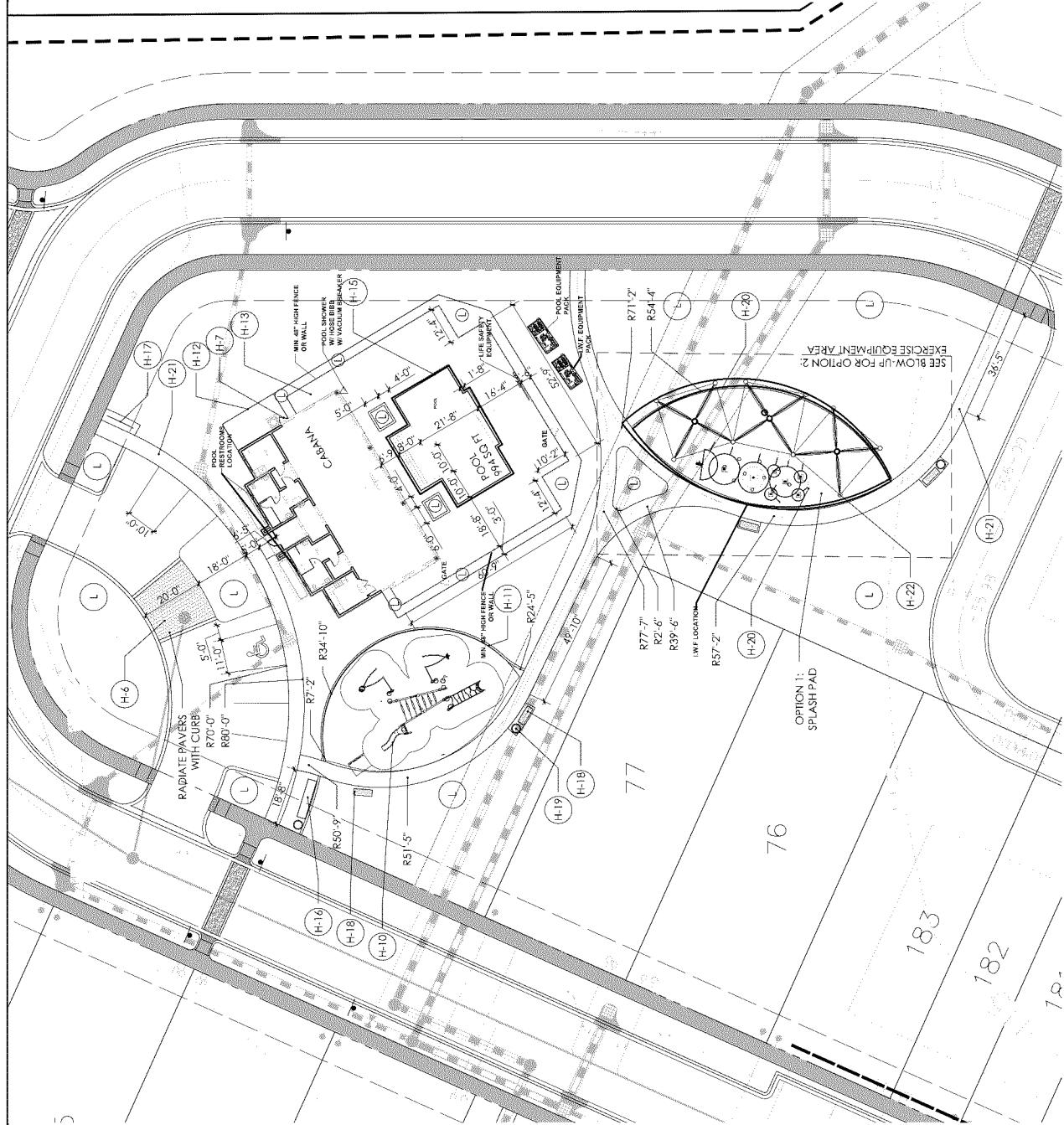
### DRAWING INDEX

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- Sheet 4.....Pool Plumbing/Layout Plan
- Sheet 5.....Pool Details
- Sheet 6.....Pool Equipment Plan
- Sheet 7.....Pool Bonding Plan
- Sheet 8.....I.W.F. Plan
- Sheet 9.....I.W.F. Feature Details
- Sheet 10.....I.W.F. Equipment

Sheet 1 of 10

### SITE PLAN NOTES:

1. RINSE SHOWER SHALL BE PROVIDED ON THE POOL DECK WITHIN THREE FEET OF THE POOL DECK. THE RINSE SHOWER SHALL MEET LOCAL CODES. PAINT COATINGS ON THE RINSE SHOWER SHALL HAVE A UNIQUE AIR GAP. EACH WASTE LINE SHALL HAVE A UNIQUE AIR GAP.
2. WASTE AND STORM COLLECTION SYSTEM WITH AIR GAP MEET LOCAL CODES. PAINT EXPOSED PVC. EACH WASTE LINE SHALL HAVE A UNIQUE AIR GAP.
3. WASTE LINES FROM DIFFERENT SOURCES SHALL NOT BE TIED TOGETHER, BUT MAY DISCHARGE INTO A COMMON SURFACE CONDUIT LOCATED IN THE POOL DECK. THIS CONDUIT AND CONDUIT LOCATIONS AND ELEVATIONS ARE THE OWNER'S AND LANDSCAPE CONTRACTOR.
4. NO FOOD OR DRINK FACILITIES WITHIN 12 FEET OF POOL DECK.
5. PROVIDE A HOSE BIB WITHIN 25 FEET OF THE RESTROOMS.
6. PROVIDE DIRECTIONAL SIGNS TO RESTROOMS.
7. NO RECREATIONAL WATER SHALL BE USED INIRRIGATION, SWIMMING POOLS, AND OTHER WATER FEATURES ALONG THE POOL DECK.
8. PANAL ALL EXPOSED PVC.
9. OUTDOOR POOL DECK TO HAVE A MINIMUM OF 25% AND A MAXIMUM OF 4% UNIFORM SLOPE AWAY FROM POOL TO DECK.
10. CONTRACTOR TO PROVIDE A MINIMUM 4' OF CLEARANCE AROUND THE POOL DECK AND MAINTAIN THE FENCE LINE FACE OF ANY STEP PADS AND ADDER ANCHORS.
11. CONTRACTOR TO PROVIDE THE POOL DECK AND MAINTAIN THE FENCE LINE FACE OF ANY STEP PADS AND ADDER ANCHORS.



### Site Plan

SCALE:  $\frac{1}{16}$ " = 1'

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For: OVIDA  
Gated Community Group Inc

Sand Lake Sound  
Amenity Pool &  
Inveractive Water Feature (I.W.F.)

Site Plan

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#	Revision Description	Date

Date: 4/30/18  
Drawn by: JP

Sheet 2 of 10

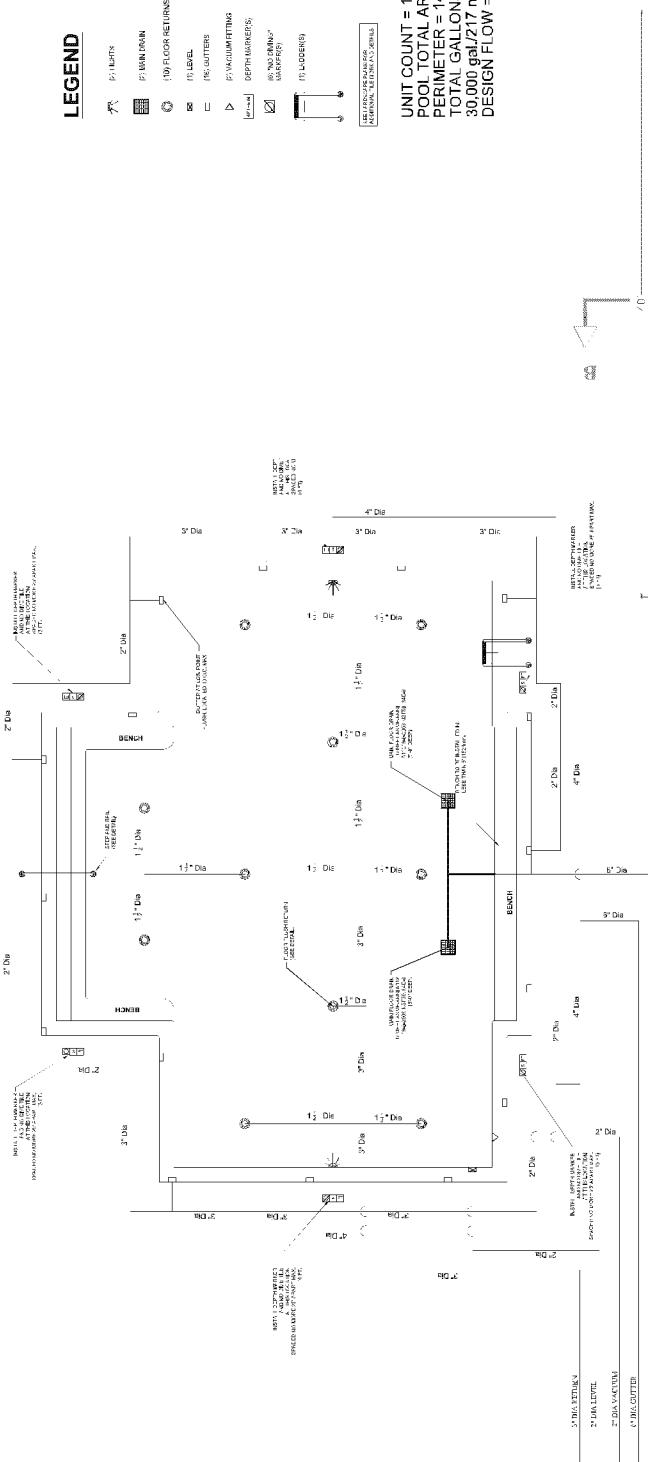


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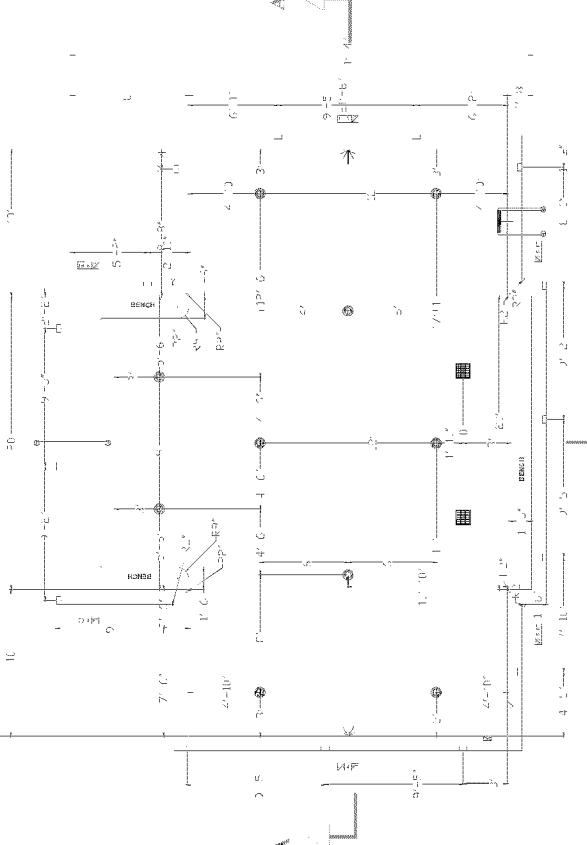
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Date: 4/30/18  
Drawn by: J.P.  
Sheet 4 of 10

## LEGEND



**POOL PLUMBING PLAN**  
SCALE: 1/4" = 1'



MAXIMUM FLOW VELOCITIES (GPM)				
PIPE DIAMETER	GRAVITY	Z SUCTION	Z PRESSURE	
1.5	17	33	55	
2.0	29	59	98	
3.0	66	132	220	
4.0	117	235	382	
6.0	264	529	881	
8.0	470	940	1,557	
10.0	734	1,489	2,448	

GRAVITY. MAXIMUM FLOW, IN GPM, AT 3.0 FPS  
SUCTION, MAXIMUM FLOW, IN GPM, AT 6.0 FPS  
PRESSURE, MAXIMUM ELCW IN GPM AT 100 ECP

## POOL LAYOUT PLAN



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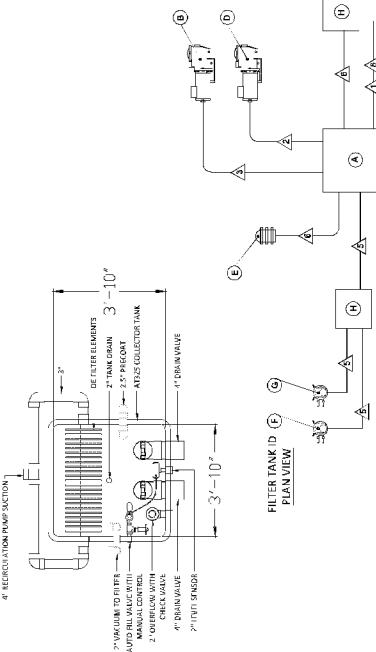
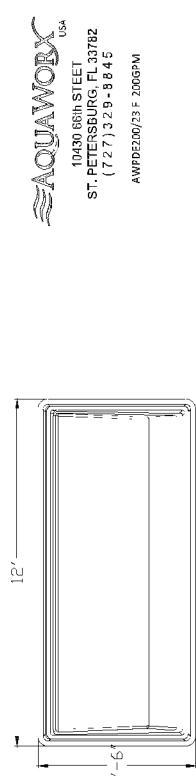
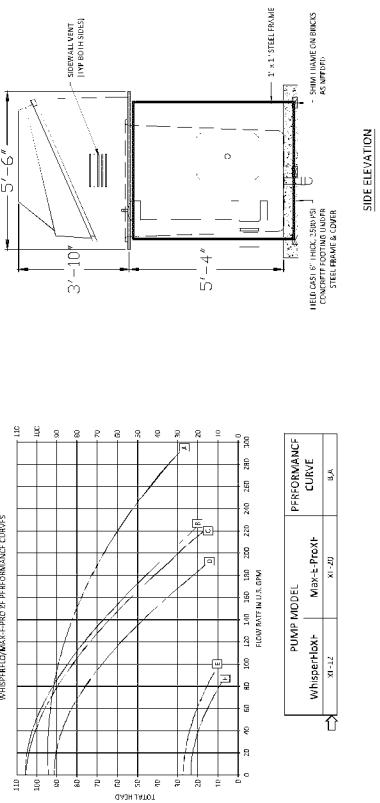
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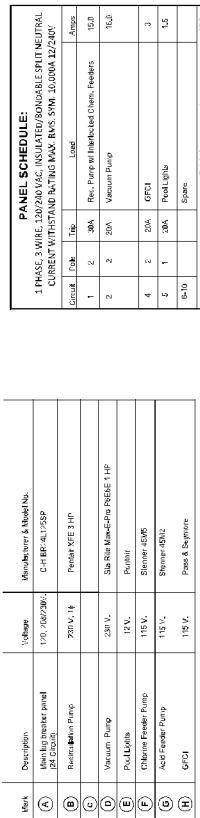
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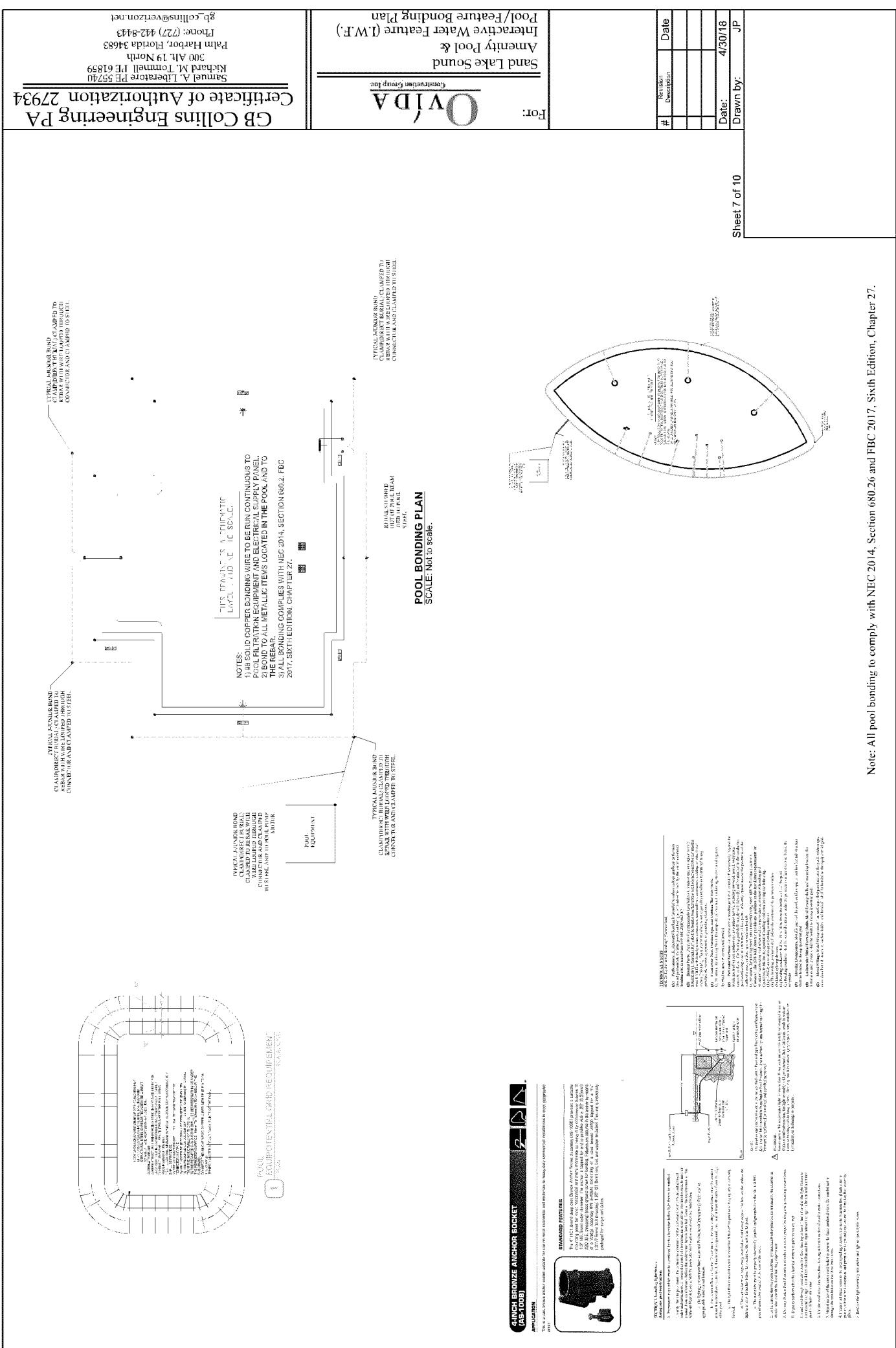


## **FIXTURE SCHEDULE:**



Date: 4/30

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For: **DVIDA**  
Sand Lake Sound  
Amenity Pool & Feature (I.W.F.)

I.W.F. Plan  
Amenity Pool & Feature (I.W.F.)

# Revision Date  
Date: 4/30/18  
Drawn by: JP

Sheet 8 of 10

**I.W.F. FEATURE PLAN**  
SCALE: 1/4" = 1'

FEATURE FLOWS	
FEATURE	PIPE RETURN SIZE
(1) Aqua Stream	3" Dia.
(1) Aqua Cannon	1.5" Dia.
(2) Aqua Spider	1.5" Dia.
(4) Aqua Bubbles	1.5" Dia.
	20 GPM
	20 GPM

**SPLASH PAD INFORMATION**

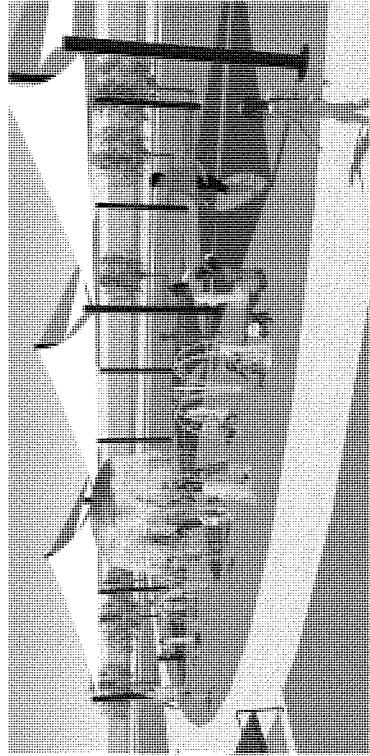
TOTAL WET AREA: 2,489 SF TOTAL  
WET DECK AREA: 200 SF TOTAL  
WET DECK PERIMETER: 147 LF TOTAL  
PROVIDE MIN. 4' WAHKA ROUND PERIMETER OF PAD.  
WALKWAY TO PITCH AWAY FROM SPLASH PAD.

FEATURE LIST

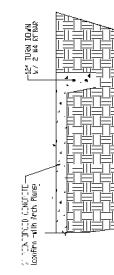
1. Aqua Stream 7
2. Aqua Cannon 2C
3. Aqua Spiders 12
4. Aqua Bubbles 4

2"dia. FEATURE RETURN

1 1/2" dia.



Sand Lake Sound  
SPLASH PAD CONCEPT  
Aqua Stream 7, Aqua Cannon 2C, Aqua Spiders 12, Aqua Bubbles 4  
DATE: 04/12/2018  
©2018 AquaWork, Inc.

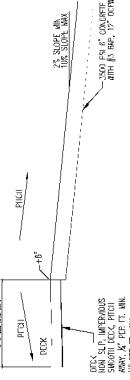


**Concrete Edge Section**  
Scale: Not to scale.

NOTES:  
1. SIDE WALL SUPPORTING THE DECK AND THE MANIFOLD ARE 14" TALL.  
2. DO NOT PAINT OR SEAL THE CONCRETE OR REINFORCED MATURE.  
3. DO NOT RUN REINFORCEMENT IN THE CONCRETE.  
4. DO NOT RUN REINFORCEMENT IN THE CONCRETE.  
5. SPACING/DEPTH PER LOCAL CODE.



Sprayground Drain Installation Detail  
Scale: Not to scale.



**Structural Slab Detail**  
Scale: Not to scale.

NOTE: THE SURFACE WILL BE CONCRETE WITH A 1/4" THICK TOP COAT. THE SURFACE SHALL BE SMOOTH, DRY, AND FREE OF ALL FOREIGN MATERIALS.  
(TO BE DETERMINED BY OWNER)

Note: All pool bonding to comply with NFCC 2014, Section 680.26 and FBC 2017, Sixth Edition, Chapter 27.

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Certificate of Authorization 27934

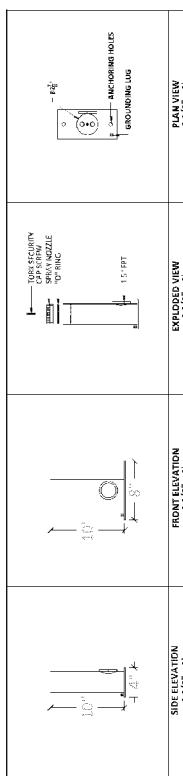
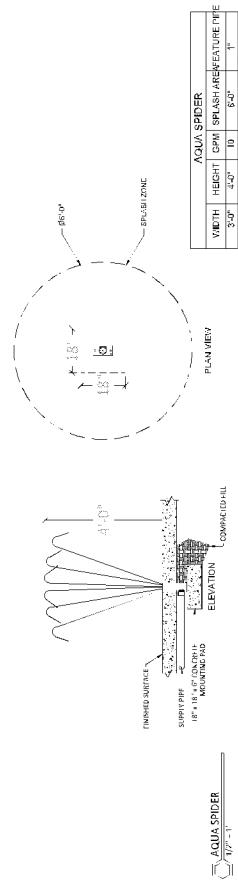
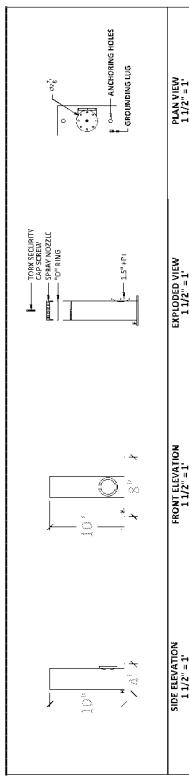
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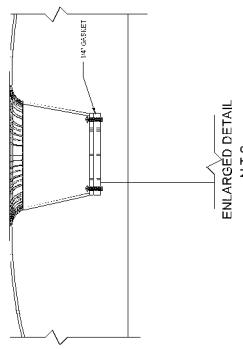
Sand Lake Sound  
Amenity Pool &  
Inwater Feature (I.W.F.)

I.W.F. Feature Details

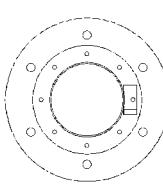


For: QVIDA  
Quintessential Waterline

PLAN VIEW  
1 1/2" = 1'



ENLARGED DETAIL  
N.T.S.



**AQUAWORKS**

USA  
1450 16TH STREET NORTH  
PINELLAS PARK, FL 33782  
(888) 425-5111



Sheet 9 of 10

# Revision Date  
Description Date  
Drawn by: JP  
Date: 4/30/18



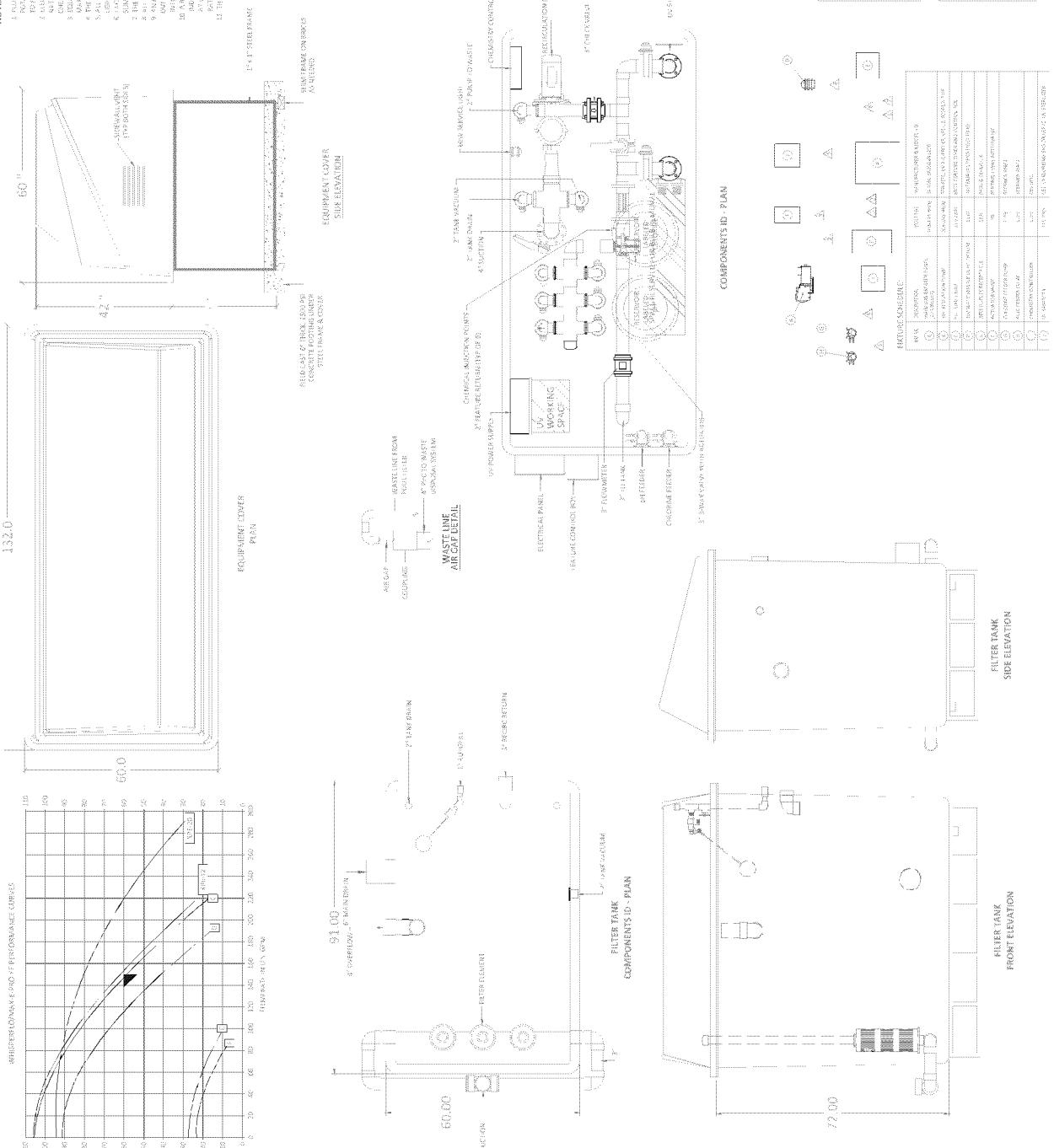
PLANTER



MOUNTING PLATE  
N.T.S.



PLANTER



Note: All pool bonding to comply with NEC 2014, Section 680.26 and FBC 2017, Sixth Edition, Chapter 27.