

JDB CODE SERVICES, INC.

Date: August 2, 2013

To: Product Approval POC of the Florida Building Commission
C/O, Mo Madani DBPR

From: Joe Belcher for the International Hurricane Protection Association (IHPA)

Subject: Public Comment on Proposed Change to Rule 61G20-3.002 - Definition of Impact Protective Systems

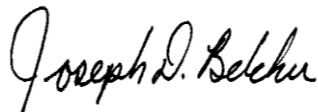
Please consider this a Public Comment requesting a change to the proposed definition of Impact Protective System. While the industry recognizes the definition being proposed is identical to the definition contained in ASTM E-1996, the industry has problems with that definition. Changes to the definition proposed by the industry are on the agenda for the next meeting of the ASTM E-06 Sub-committee. The industry prefers the following definition contained in ASCE 7-10 until such time as the definition in the ASTM standard can be modified and adopted within the code.

IMPACT PROTECTIVE SYSTEM: Construction that has been shown by testing to withstand the impact of test missiles and that is applied, attached, or locked over exterior glazing.

The request by the industry is related to difficulties encountered with the ASTM definition in the past. The phrase "...to protect that system ..." is often erroneously interpreted to mean the glazing is to be protected, rather than the opening. The Commission clarified this issue previously via a Declaratory Statement (DCA08-DEC-002) and approval of changes to the code to clarify it is the opening that is being protected; not the glazing. The industry believes the introduction of the proposed definition will very likely lead to a return to the problems of the past. Additionally, in keeping with the Commission's desire to make the changes to the code at the base code level, the industry submitted the ASCE definition for inclusion in the IRC. While the Code Action Committee recommended disapproval, the industry submitted a Public Comment and intends to take the issue to the building officials during the October meetings at Atlantic City, New Jersey.

Should any member of the POC wish to discuss this or require and further information, please do not hesitate to contact me at your convenience. Thanking you in advance for your consideration in this matter, I remain,

Respectfully yours,



Cc: Dr. Jeff Stone, Chairman, Product Approval POC
Frank Browning, President, IHPA
James Richmond, Executive Director