



Petition for Declaratory Statement
From the Florida Building Commission

April 25, 2008

Florida Building Commission
Florida Department of Community Affairs
2555 Shumard Oak Blvd.
Tallahassee, FL 32399-2100
Attention: Ms. Paula Ford, Agency Clerk

DCA08-DEC 119
FILING AND ACKNOWLEDGEMENT
FILED, on this date, with the designated
Clerk, receipt of which is hereby
acknowledged.

Paula P. Ford 4/25/08
Paula P. Ford
Commission Clerk

RE: Sections R613.3.1 and R613.3.1.1 and 1714.5.2.1, 2007 Florida Building Code, Residential and Building volumes.

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

On behalf of the Fenestration Manufacturers Association (FMA) and the Window and Door Manufacturers Association (WDMA), a clarification and interpretation is requested for language adopted in Section R613.3.1, Testing and Labeling; and Section R613.3.1.1, Testing and Labeling of Skylights; and Section 1714.5.2.1, Testing and Labeling of the 2007 Florida Residential and Building Code.

R613.3.1 Testing and Labeling. Exterior windows and glass doors shall be tested by an approved independent testing laboratory, and shall be labeled with an approved permanent label identifying the manufacturer, the product model/series number, performance characteristics and approved product certification agency, testing laboratory, evaluation entity or Miami-Dade Product Approval to indicate compliance with the requirements of one of the following specifications:

ANSI/AAMA/NWDA 101/I.S.2 or 101/I.S.2/NAFS or AAMA/WDMA/CSA 101/I.S.2/A440 or TAS 202 (HVHZ shall comply with TAS 202 utilizing ASTM E 1300-98 or ASTM E 1300-02.)

The permanent label is limited to only one design pressure rating per reference standard per label. Exterior windows and glass doors shall be labeled with a temporary supplemental label printed and applied by the manufacturer. The label shall identify the manufacturer, products model/series number, positive and negative design pressure rating, products maximum size, glazing thickness, indicate impact rated if applicable, Florida Product Approval or Miami-Dade Product Approval number if applicable, and applicable test standard. The supplemental label is limited to only one design pressure

rating per reference standard per label. This supplemental label shall remain on the window until final approval by the building official.

The permanent label is always the default label in case the temporary label is missing or no longer legible for final approval by the building official.

1714.5.2.1 Testing and labeling. Exterior windows and glass doors shall be tested by an approved independent testing laboratory, and shall be labeled with an approved label identifying the manufacturer, performance characteristics and approved product certification agency, testing laboratory, evaluation entity or Miami-Dade Product Approval to indicate compliance with the requirements of one of the following specifications: ANSI/AAMA/NWDA 101/I.S.2 or 101/I.S.2/NAFS or AAMA/WDMA/CSA 101/I.S.2/A440 or TAS202 (HVHZ shall comply with TAS202 utilizing ASTM E 1300-98 or ASTM E 1300-02 or Section 2404).

Exterior windows and glass doors shall be labeled with a temporary supplemental label printed and applied by the manufacturer. The label shall identify the manufacturer, products model/series number, positive and negative design pressure rating, products maximum size, glazing thickness, indicate impact rated if applicable, Florida Product Approval or Miami-Dade Product Approval number if applicable, and applicable test standard. The supplemental label is limited to only one design pressure rating per reference standard per label. This supplemental label shall remain on the window until final approval by the building official.

The permanent label shall always be the default label in case the temporary label is missing or no longer legible for final approval by the building official.

R613.3.1.1 Testing and labeling of skylights. 1714.5.2.1.1 Testing and labeling of skylights. Exterior skylights shall be tested by an approved independent testing laboratory, and shall be labeled with an approved permanent label identifying the manufacturer, the products model/series number, performance characteristics and approved product evaluation entity to indicate compliance with the requirements of the following specifications:

AAMA/WDMA 101/I.S.2/NAFS, Voluntary Performance Specification for Windows, Skylights and Glass Doors, or TAS 202 (HVHZ shall comply with TAS 202).

The permanent label is limited to only one design pressure rating per reference standard per label.

Exterior skylights shall be labeled with a temporary supplemental label printed and applied by the manufacturer. The label shall identify the manufacturer, products model/series number, positive and negative design pressure rating, products maximum size, glazing thickness, indicate impact rated if applicable, Florida Product Approval or Miami-Dade Product Approval number if applicable, and applicable test standard. The supplemental label is limited to only one design pressure rating per reference standard per label. This supplemental label shall remain on the window until final approval by the building official. The permanent label is always the default label in case the temporary label is missing or no longer legible for final approval by the building official.

Assertions:

The 2007 Florida code introduces new terms, "approved permanent label" as well as added product and performance information for product labeling. As written, the current code has raised questions and confusion with our members. While the term "permanent label" is defined in the code, the understanding of this term varies widely. From our perspective, the primary purpose of a permanent label is to identify the manufacturer, should there be a need to trace back or re-validate the products performance information. Adding information beyond a manufacturer's identification begins to place the manufacturer in a difficult position between regulators desiring more information and customers who do not want finishing/painting obstructions or visual intrusions as they look out the window, skylight or door product.

The rationale for creating a supplemental label (also referred to as a temporary label) was to provide building officials with readily readable window, skylight and sliding glass door performance information. The supplement or temporary label is where we feel the focus of the product performance and additional information should be provided.

Therefore, WDMA and FMA believe the intent and correct interpretation of the product labeling provisions for windows, sliding glass doors and skylights of Sections R613.3.1, R613.3.1.1 and 1714.5.2.1 of the 2007 Florida Building Code is that the information required in these sections is to be included on a supplemental/temporary label that remains on the product until final approval. Further, a permanent label or marking must identify the manufacturer, but all remaining information required in these sections may be included, but is not mandatory. Examples of supplemental/temporary labels are attached.

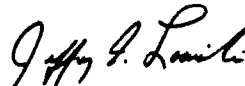
Do you agree with this interpretation?

Thank you for your assistance in this matter.

Respectfully submitted:



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WDMA Hallmark labeling with Florida Code required info for Supplemental Label.

Examples of Supplemental or Temporary Labels

(Format to follow certification entity's requirements)

Example 1: Non-impact rated product

WDMA	
HALLMARK	WINDOW AND DOOR MANUFACTURERS ASSOCIATION WWW.WDMA.COM
CERTIFIED	
MANUFACTURER NAME	
Clad Casement	
Manufacturer Stipulates Conformance to the applicable standards	
DP +50/-50 36" X 72"	
Glazing 1/8" each pane	
Tested to: AAMA/WDMA/CSA 101/I.S.2/A440-05-08	
FL# xxxx.x	

Logo and information required by certification entity
 Mfg name required per Florida Code
 Name/series required per FL code and WDMA

 +/- DP and Max tested size required by FL code
 Each pane of glazing thickness reported per F code
 Applicable test std per FL code
 FL# required per Florida Code

Example 2: Impact rated product using Florida Product Approval only

WDMA	
HALLMARK	WINDOW AND DOOR MANUFACTURERS ASSOCIATION WWW.WDMA.COM
CERTIFIED	
MANUFACTURER NAME	
Clad Casement	
Manufacturer Stipulates Conformance to the applicable standards	
DP +50/-50 36" X 72"	
Glazing .125" ann. outer/ .312 lam. inner	
Tested to: AAMA/WDMA/CSA 101/I.S.2/A440-05-08 ASTM E 1996 & ASTM E 1886 Missile D Wind Zone 4	
FL# xxxx.x	

Logo and information required by certification entity
 Mfg name required per Florida Code
 Name/series required per FL code and WDMA

 +/- DP and Max tested size required by FL code
 Each pane of glazing thickness reported per F code

 Applicable test std per FL code
 FL# required per Florida Code

Example 3: Impact rated product using both Florida Product Approval and Dade NOA

WDMA	
HALLMARK	WINDOW AND DOOR MANUFACTURERS ASSOCIATION WWW.WDMA.COM
CERTIFIED	
MANUFACTURER NAME	
Clad Casement	
Manufacturer Stipulates Conformance to the applicable standards	
DP +50/-50 36" X 72"	
Glazing .125" ann. outer/ .312 lam. inner	
Tested to: AAMA/WDMA/CSA 101/I.S.2/A440-05 TAS 201, 202, & 203	
ASTM E 1996 & ASTM E 1886 Missile D Wind Zone 4	
FL# xxxx.x Miami-Dade NOA# 00-xxxx-xx	

Logo and information required by certification entity
 Mfg name required per Florida Code
 Name/series required per FL code and WDMA

 +/- DP and Max tested size required by FL code
 Each pane of glazing thickness reported per F code

 Applicable test std per FL code
 FL# or Dade NOA# required per Florida Code