

- Roofing
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SystemComponents Corporation

April 29, 2008

Building Codes and Standards Office
Attention: Mr. Mo Madani
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

original via first class mail

Re: Request for Declaratory Statement on Rule 9B-3.0475

Dear Mr. Madani,

Thank you for the conversation today.

System Components Corporation is a manufacturer of roofing underlayment materials. Goods supplied by System Components are recognized in Miami Dade NOA No. 06-0919.01 and Florida Product Approval No. FL8700.

Section 201.2, item (c) of Rule 9B-3.0475 dos not provide a defined performance requirement for approved underlayment materials. The reference to "approved asphalt impregnated 30# felt underlayment" is typically qualified by compliance with ASTM D 226 (Type II). System Components is requesting a declaratory statement to confirm that the approval basis for the underlayments referenced in Section 201.2, item (c) of Rule 9B-3.047 is based on compliance with Florida Building Code Section 1518.4 and Florida Residential Code Section R4402.7.4 (below).

SECTION 1518 HIGH-VELOCITY HURRICANE ZONES—ROOF COVERINGS WITH SLOPES 2:12 OR GREATER

1518.4 All underlayment applications for prepared roof coverings shall be applied in compliance with the manufacturer roofing assembly Product Approval, and shall be not less than one of the following: (1) A double layer of an ASTM D 226 Type I, with a 19-inch (483 mm) headlap; or (2) A single layer of an ASTM D 226, type II with a 4-inch (102 mm) headlap; or (3) A single layer of an ASTM D 2626 coated base sheet with a 4 inch (102 mm) headlap, and (4) All endlaps shall be a minimum of 6 inches (152 mm).

SECTION R4402.7 HIGH-VELOCITY HURRICANE ZONES — ROOF COVERINGS WITH SLOPES 2:12 OR GREATER

R4402.7.4 All underlayment applications for prepared roof coverings shall be applied in compliance with the manufacturer roofing assembly Product Approval, and shall be not less than one of the following: (1) A double layer of an ASTM D 226 Type I, with a 19 inch headlap; or (2) A single layer of an ASTM D 226, Type II with a 4-inch (102 mm) headlap; or (3) A single layer of an ASTM D 2626 coated base sheet with a 4 inch (102 mm) headlap, and (4) All endlaps shall be a minimum of 6 inches (152 mm).

Thank you very much for your assistance. I can be contacted at the numbers below with any further questions.

Sincerely,



Chris Shepherd

DC#08-DEC-124
FILING AND ACKNOWLEDGEMENT
FILED, on this date, with the designated
Clerk, receipt of which is hereby
acknowledged.
Paula P. Ford
Commission Clerk
Date 4/30/08