Construction Specialties

Construction Specialties, Inc. 49 Meeker Ave. Cranford, NJ 07016

12408-DEC-236

July 31, 2008

Paula Ford
Department of Community Affairs
Building Codes and Standards
255 Shumard Oak Boulevard
Tallahassee, Florida 32399

FILING AND ACKNOWLEDGEMENT FILED, on this date, with the designated Agency Clerk, receipt of which is hereby acknowledged?

Minam Snipes / Deputy Agency Clerk

pehary Agency Clark

Subject: Petition for Declaratory Statement before the Florida Building Commission

Dear Ms Ford

Petitioner: Construction Specialties

49 Meeker Avenue Cranford NJ 07016 Phone 908 272 5200 Fax 908 272 5844

Representative: W Vincent

49 Meeker Avenue Cranford NJ 07016 Phone 908 325 4937 Fax 908 272 5844

The petitioner, Construction Specialties manufactures louvers that are used in Florida. The petitioner seeks clarification of section 1609.1.2.1 of the Florida Building 2007 Code.

When louvers are installed on buildings located in Florida wind borne debris regions outside of high velocity hurricane zones, the Florida Building Code 1609.1.2.1 requires louvers that are located within 30 feet of the grade and that are protecting ventilation ducts not assumed to be open (an open design would assume internal pressure coefficients are zero) to be large missile impact resistant. If there are no ducts attached to the louver are there any impact requirements? Are there any impact requirements for louvers above 30 ft.

Louvers that are included in section 1609.1.2.1 are to be tested according to the large missile test of ASTM E 1996. ASTM E 1996 specifies that the test method E 1886 be used for conducting the impact test. E 1886 specifies a cyclic pressure test be applied after the impact test. Is it the intention of section 1609.1.2.1 that louvers be subjected to cyclic loading after the impact test as well as the static test mentioned in 1609.1.2.2.1?

Under what circumstances does the code require enhanced protection and testing with a 9 lb 2 X 4 at 80 feet per second?

W Vincent cc:Mo Madani