



## PETITION for DECLARATORY STATEMENT

Before the Florida Building Commission

Petitioner:

Timothy Graboski, Tim Graboski Roofing Inc.  
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2009 supplement to the 2007 Florida Building Code, Chapter 15, section 1507.2.7.1

I am a State of Florida Certified Roofing Contractor and I am in the process of providing a roofing quotation for a project located in Broward County, wind zone of 140 having an exposure C category and a roof mean height of 22 feet. The specified roof covering is Asphalt Shingles.

While reviewing the shingle product approval NOA#07-011104 (attached). Section 3 specifically lists the EVIDENCE SUBMITTED. The testing for uplift is listed as TAS 107. When reviewing the test standard under TAS 107, it becomes evident that the testing is equivalent to ASTM D3161 class F. These standards are equivalent to 110 mph wind speed evaluation.

Also while reviewing the test standards and code language for asphalt shingles under section 1507.2.7.1, I would request a declaratory statement on the following concerns:

- For the project in question and using the Table 1507.2.7.1 and using the wind speed of 140 mph, is the asphalt shingle product classified as ASTM D3161 class F or TAS 107 qualifying for this project .



Section 1507.2.7.1 revise to read as shown:

1507.2.7.1 Wind Resistance of Asphalt Shingles. Asphalt Shingles shall be classified in accordance with ASTM D3161, TAS 107 or ASTM D7158 to resist the basic wind speed per Figure 1609. Shingles classified as ASTM D 3161 Class D or ASTM D 7158 Class G are acceptable for use in the 100-mph wind zone. **Shingles classified as ASTM D3161 Class F, TAS107 or ASTM D 7158 Class H are acceptable for use in all wind zones.** Asphalt shingle wrappers shall indicate compliance with one of the required classifications as shown in Table 1507.2.7.1.

Table 1507.2.7.1(1) revise table to read as shown:

**Table 1507.2.7.1**  
**Wind Resistance of Asphalt Shingles**

Maximum Basic Wind Speed MPH (per Figure 1609)	Classification
100	ASTM D3161 Class D or ASTM D 7158 Class G or TAS 107
110	ASTM D3161 Class F or ASTM D 7158 Class G or TAS 107
120	ASTM D3161 Class F or ASTM D 7158 Class G or TAS 107
130	ASTM D3161 Class F or ASTM D 7158 Class H or TAS 107
140	ASTM D3161 Class F or ASTM D 7158 Class H or TAS 107
150	ASTM D3161 Class F or ASTM D 7158 Class H or TAS 107



My concern is the test standards for ASTM D3161 Class F & TAS 107 certify asphalt shingles to wind speed of 110 mph. How does a test standard limited to 110 mph qualify a product or system for wind zones greater than 110 mph?

The Department of Community Affairs issued a clarification to the Florida Building Commission (attached) instructing the necessity “Verification of Compliance with the Limitations of Use”.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'Tim Graboski', is positioned below the text 'Respectfully Submitted,'.

Timothy Graboski  
Tim Graboski Roofing Inc

18<sup>th</sup> of November 2010