

**Issue DS 2021-049:** Petitioner seeks a Declaratory Statement on determination of whether railing systems falls within the scope of the Florida Product Approval Rule 61G20-3.

Petitioner seeks clarification of the following question:

Question:

Petitioner respectfully seeks clarification whether railing systems fall under the scope of the FBC product approval program.

### **Background:**

The Petitioner is a manufacturer of Cellular PVC railing systems. According to the Petitioner, architects, contractors, and inspectors are asking for the FBC Approval number for railing system and they believe that the FBC Code approval numbers apply to all products as a basis for their product decision making and have done so for years. Petitioner have submitted his CCR Report showing testing results to FBC codes to architects, builders or building Inspectors but they don't accept that as sufficient. They just ask for the FBC number.

#### **61G20-3.001 - Scope.**

(1) Products in the following categories as defined by subcategories of subsection 61G20-3.002(31), F.A.C., shall be available for approval by the Commission pursuant to Rule 61G20-3.007, F.A.C., for use in the state:

- (a) Panel Walls;
- (b) Exterior Doors;
- (c) Roofing Products;
- (d) Skylights;
- (e) Windows;
- (f) Shutters; and
- (g) Structural Components.

(2) This rule applies to approval of products and systems, which comprise the building envelope and structural frame, for compliance with the structural requirements of the Florida Building Code.

#### **61G20-3.002 Definitions.**

(33) Subcategory of product or construction system means a specific functionality:

(a) For exterior door:

1. Exterior door assemblies: roll-up, sectional, sliding, swinging, automatic; pre-engineered roof access hatches; and products introduced as a result of new technology;

2. Exterior door components and products introduced as a result of new technology;

(b) For windows: awning, casement, dual action, double hung, single hung, fixed, horizontal slider, projected, pass through, mullions, and products introduced as a result of new technology;

(c) For panel walls: siding, soffits, exterior insulation finish system (EIFS), storefronts, curtain walls, wall louver, glass block, and products introduced as a result of new technology;

(d) For roofing products: built up roofing, modified bitumen roof system, single ply roof systems, spray applied polyurethane roof system, roofing fasteners, roofing insulation, asphalt shingles, wood shingles and shakes, roofing

slate, roof tile adhesives, cements-adhesives-coatings, liquid applied roof systems, underlayments, metal roofing, roofing tiles, waterproofing, roofing accessories that are an integral part of the roofing system and products introduced as a result of new technology;

(e) For shutters: accordion, Bahama, storm panels, fabric storm panel, colonial, roll-up, pre-engineered equipment, protection, and products introduced as a result of new technology;

(f) For skylights: skylight, and products introduced as a result of new technology; and

(g) For structural components: truss plates, wood connectors, anchors, exterior coolers-freezers, insulation form systems, engineered lumber, pre-engineered air conditioner stands, structural wall components, and roof deck, and products introduced as a result of new technology.

(h) For impact protective systems include types that are fixed, operable, or removable.

**Rule 9B-72 Product Approval (PAWG recommendations of 2005)/rule as revised 11-22-06)**

**9B-72.005 Scope.**

(1) Products in the following categories as defined by subcategories of subsection 9B-72.010(29), F.A.C., shall be either approved by the Commission pursuant to Rule 9B-72.090, F.A.C., for use in the state or approved by local jurisdictions pursuant to Rule 9B-72.050, F.A.C., for use within that jurisdiction:

a) Panel Walls;

(b) Exterior Doors;

(c) Roofing Products;

(d) Skylights;

(e) Windows;

(f) Shutters;

(g) Structural components; and

(2) This rule applies to approval of products and systems, which comprise the building envelope and structural frame, for compliance with the structural requirements of the Florida Building Code.

9B-72.010

(g) For structural components: truss plates, wood connectors, anchors, exterior coolers-freezers, ~~sheds, concrete admixtures,~~ insulation forms systems, engineered lumber, ~~material, plastics,~~ structural wall, roof deck-~~roof, railing, or other; and~~ Pre-engineered AC stands and products introduced as a result of new technology.

**DS2015-007 by Gary Kauffman of Digger Specialties, Inc.**

**Question:** *Do the aluminum and vinyl railings in question fall within the scope of 61G20-3?*

**Answer:** No, as per the definition of “structural component” (see Rule 61G20-3.002) and Rule 61G20-3.001, the products in question fall outside the scope of the state product approval program. However, these products must meet the requirements of the Florida Building Code and are subject to approval by the local authority having jurisdiction.

**Staff Analysis:**

**Question:**

Petitioner respectfully seeks clarification whether railing systems fall under the scope of the FBC product approval program.

**Answer:**

As per the definition of "structural component" (see Rule 61G20-3.002) and Rule 61G20-3.001, the products in question fall outside the scope of the state product approval program. However, these products must meet the requirements of the Florida Building Code and are subject to approval by the local authority having jurisdiction.