

JDB CODE SERVICES, INC.

November 19, 2021d

Florida Building Commission
C/O Mo Madani
Division of Professions
2601 Blirstone Road
Tallahassee, Florida 32399

SUBJECT: Request for Individual Consideration

Florida Building Commission:

Please consider this a request for Individual Consideration of the following Code Modifications.

M9433 – G119-18

Reason: The maker of the motion to deny preceded his motion by asking, “how do we know the vapor diffusion port would not let moisture in?” While the vapor diffusion port and the proposed changes to the Florida Building Code-Building (FBC-B) are new to the FBC-B, they are not new to the Florida Building Code. The definition and provisions are in the current Florida Building Code-Residential (FBC-R). A primary purpose of the change is to correct the oversight of not proposing the inclusion of the method in the FBC-B 7th Edition (2020). The provisions being proposed in general are part of the Florida Building Code-Residential (FBC-R). There are some improvements to what is in the FBC-R to be discussed below.

1. The definition for Vapor Diffusion Port was added to the Florida Building Code-Residential 7th Edition (2020).
2. Some of the provisions proposed for FBC-B §1203.3 are in the FBC-R §806.5 Item 5.2.
3. Items 5.2.6 through 5.2.9 and 5.3 are new in this proposal but are in the IRC 2021.
4. Items 5.2.6 through 5.2.9 and 5.3 are further improvements and guidance on this method for providing unvented attics to assist in dealing with the moisture problems prevalent in Florida.

M8452 – M25-18

Reason: The change modifies ventilation rates, increasing them to match ASHRAE 62.1-2016. While the rates may be suitable for other parts of the country, in Florida, moisture will be introduced, possibly to the point of requiring dehumidification systems which would negate any positive energy savings.

M9296 – RM9-18

Reason: The proponent stated there would be no cost increase or decrease. There will undoubtedly be a cost increase in labor and material, and there was no cost information provided by the Residential Construction Cost Impact Work Group.

M9314 RM11-18

Reason: The Proponent stated in his reason that the provision would reduce the cost of construction. The opposite is true. The change would require the mechanical contractor to install blocks on or near the equipment pad to support the refrigerant line instead of laying the lines on the ground or floating them above the ground from the condenser to the home as is current practice. The RCCIWG estimated a cost increase of \$40. There have been no problems with vibration causing damage to the lines.

Thank you,



Joseph D. Belcher
Code Consultant