

Fenestration & Glazing Industry Alliance (FGIA) Comment on Florida Supplement to the 7th edition, for the 8th edition Florida Building Code

Revise the following Florida Existing Building Code sections as follows:

505.2 Window ~~fall prevention opening control devices~~ on replacement windows. In Group R-2 or R-3 buildings containing dwelling units and one- and two-family dwellings and townhouses regulated by the *Florida Building Code, Residential*, window opening control devices or **other window** fall prevention devices complying with ASTM F2090 shall be installed where an existing window is replaced and where all of the following apply to the replacement window:

702.4 Window ~~fall prevention opening control devices~~ on replacement windows. In Group R-2 or R-3 buildings containing dwelling units and one- and two-family dwellings and townhouses regulated by the *Florida Building Code, Residential*, window opening control devices **or other window fall prevention devices** complying with ASTM F2090 shall be installed where an existing window is replaced and where all of the following apply to the replacement window:

Reasoning:

The current supplement to the 2020 Florida Existing Building Code has a discrepancy in that 702.4 does not include the words “fall prevention devices” but 505.2 does. Both sections are about fall prevention, and window opening control devices (WOCDs) are one of several options in addressing fall prevention. Therefore, in addition to ensuring the wording in both sections align, we are suggesting the titles of sections 505.2 and 702.4 be updated to more accurately reflect that these sections are addressing fall prevention in replacement windows and not just specifically WOCDs. Then within the body of each section the comment clarifies that WOCDs or other type of fall prevention devices complying with ASTM F2090 must be installed during replacement when all the following existing code language applies.

Nothing in this comment changes the current requirements but simply provides clarity and consistency, a similar proposal was adopted by the ICC for what will be in the 2024 IEBC (EB74-22) and FGIA believes these same fixes would be of benefit in the Florida Existing Building Code. In addition, this language aligns with the following modifications already adopted by the Commission in the current code development cycle:

F10414 – AS

R310.1.1 Operational constraints and opening control devices.

Emergency escape and rescue openings shall be operational from the inside of the room without the use of keys, tools or special knowledge. Window opening control devices **and fall prevention devices** complying with ASTM F2090 shall be permitted for use on windows serving as a required emergency escape and rescue opening.

S10428 – AS

AJ102.4.3 Replacement windows for eEmergency escape and rescue openings.

Where windows are required to provide emergency escape and rescue openings, replacement windows shall be exempt from ~~the maximum sill height requirements of Section R310.1 and the~~

~~requirements of Sections R310.1.1, R310.1.2, R310.1.3 and R310.2.1 and R310.2.2~~ provided that the replacement window meets the following conditions:

1. The replacement window is the manufacturer's largest standard size window that will fit within the existing frame or existing rough opening. The replacement window shall be permitted to be of the same operating style as the existing window or a style that provides for an equal or greater window opening area than the existing window.
 2. ~~Where t~~The replacement window is not part of a change of occupancy.
- ~~3.~~ Window opening control devices **and fall prevention devices** complying with ASTM F2090 shall be permitted for use on windows servicing as required ~~to provide~~ emergency escape and rescue openings.

AJ102.4.3.1 Control devices

Emergency escape and rescue openings with **window opening control devices or fall prevention devices** complying with ASTM F2090, after operation to release the control device allowing the window to fully open, shall not reduce the net clear opening area of the window unit. Emergency escape and rescue openings shall be operational from the inside of the room without the use of keys or tools.

AJ102.4.4 Window control devices.

~~Where window fall prevention devices complying with ASTM F2090 are not provided,~~ Window opening control devices **or fall prevention devices** complying with ASTM F2090 shall be installed where an existing window is replaced and where all of the following apply to the replacement window:

F10415 – AS

1030.4 Operational constraints.

Emergency escape and rescue openings shall be operational from the inside of the room without the use of keys or tools. **Window-opening control devices and fall prevention devices** complying with ASTM F2090 shall be permitted for use on windows serving as a required *emergency escape and rescue opening*. Bars, grilles, grates or similar devices are permitted to be placed over *emergency escape and rescue openings* provided the minimum net clear opening size complies with Section 1030.2 and such devices shall be releasable or removable from the inside without the use of a key, tool or force greater than that which is required for normal operation of the *emergency escape and rescue opening*. Where such bars, grilles, grates or similar devices are installed in existing buildings, *smoke alarms* shall be installed in accordance with Section 907.2.11 regardless of the valuation of the *alteration*.