

Commonwealth of Pennsylvania
 Uniform Construction Code
 Review and Advisory Council

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
 2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	12-15-11
Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	RP-1
Code Section(s):	IPC P312.3
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

This is not so much of a code change as it is a clarification, but it will result in increased costs because water freezes at 32°. PVC solid pressure pipe is rated at 330 psi for 1 ½" down to 220 psi for 4" and while these ratings are for water and solid pipe it seems clear that 5 psi for any approved piping is not a substantial hazard. In my experience the danger is from people not knowing what 50 psi will do to a plug their removing or from a clamped on temporary rubber cap (ferenco cap) coming off under 5 psi air pressure or water pressure. These caps can come off rapidly and without warning if improperly installed but that is true regardless of the pipe material. If the test is the danger then air should never be allowed, but since water freezes and air testing does not increase the danger in plastic alone we should recommend caution and not penalize the plastic pipe industry for what's not their problem. Thank You

**Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
 Bureau of Occupational & Industrial Safety
 Department of Labor and Industry
 651 Boas Street, Room 1613
 Harrisburg, PA 17121**

	RAC Use Only	
Submission Method:	Public Hearing:	Date Received: 12-15-11
	E-Mail: <input checked="" type="checkbox"/>	

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Thomas F McCosby

407 Hunt Rd New Castle, PA 16101
home 724-924-2687 cell 724-714-8502

December 16, 2012

Review and Advisory Council

re; 2012 code change recommendation forms

Ladies & Gentlemen,

I am including this cover letter with my code change recommendation forms in an effort to help clarify my position on these matters.

First I would like to give you a little background information. I am a third generation builder and have spent my entire life in residential and light commercial construction. Having grown up in Allegheny County, I was exposed to arbitrary inspectors without adequate backgrounds in construction. So in 2003 before the codes took effect I began studying the 2000 IRC to be better prepared. My first UCC footer inspection was performed by the electrical inspector we had worked with for several years. To say I was disappointed that after 28 years of digging and pouring footers my footer was inspected by an electrical inspector is an understatement. Therefore I started taking the certification tests to be better able to prove my expertise. In March of 2005 I was offered a job as an inspector. I am currently employed by Pennsylvania Construction Inspection as an inspector while continuing to work for T W McCosby Construction. I possess 27 state and national certifications and was the eighth fully certified inspector in Pennsylvania. Sorry for the long introduction but I wanted to be clear that professionalism is very important to me.

Secondly I want to be clear that western Pennsylvania is important to me and I want the people of western Pennsylvania to have safe, affordable, and energy efficient housing available to them. We are currently building houses so slowly that it would take almost 800 years to replace our current housing stock. This rate of construction cannot be maintained without dire consequences for our future. We must have codes that allow us to replace current substandard housing without sacrificing safety or affordability. Many of the code changes are not applicable to Pennsylvania, our climate, and economy. While a few dollars per square foot may seem small when housing sells for \$400.00 per square foot, this same change can be huge or insurmountable when housing appraises for \$100.00 per square foot or less, and is often below the cost of construction.

Finally Pennsylvania will be best served by a building code custom tailored for our needs. You've heard that the ICC can produce a code book based on the amendments that are/have been made. I believe this is long overdue as the Legislature has made significant changes to the code that are not included in the code books and sending people to L&I's website for the changes is inefficient at best and confusing at worst. I have been providing seminars for the builders associations and inspectors since 2006 and many inspectors don't understand the code changes and will often misinterpret the rules resulting in inconsistent enforcement and wasted time and money. Thank you for reading this long explanation but we need a Uniform Construction Code and a single reference to enforce it.

Sincerely

Thomas F McCosby, MCP

Commonwealth of Pennsylvania
 Uniform Construction Code
 Review and Advisory Council

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Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	RM-10
Code Section(s):	IRC M1506.2
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

This code change reminds me of a 2009 code change requiring 6 mil plastic in all garages because they might be used as living space someday. It must have seemed like "no big deal" at the time but look at the code change in IRC R506.2.3, removing the vapor barrier requirement, or remember the anchor bolt fiasco of 2006 which the legislature had to fix and the ICC repealed in 2009. This is clearly a "what if" requirement and if you're going to go down that road you're going to need a lot more paper for codes and a lot less lumber for houses. In modern air conditioned house air intakes near operable windows are much less of a problem than in the past, let's not add a code change that may be revoked just because someone might install an operable window, which they may never open, someday. Thank you

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Submission Method:	Public Hearing:	Date Received: 12-15-11
	E-Mail: <input checked="" type="checkbox"/>	

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Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	12-15-11
Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	RB-122
Code Section(s):	IRC R612.2
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

This code change will alter the way houses are built in Pennsylvania far beyond the intention of the code. While preventing falls out of second floor windows is a reasonable goal, raising the sill height to 36" will eliminate traditional double hung windows in most cases. With a head height of 82" (door rough opening height) and a minimum emergency escape height of 24" (resulting in window heights of 57" or more) double hung windows have a sill height of 27" or less. (82"-57"+2" of sill) Buying guards to be stored in a closet or switching to casement windows will not significantly increase the safety of the windows (children are natural born climbers) but it will reduce the ways emergency escape openings can be used. A maximum sill height of 44" and a minimum sill height of 36" conflict and many designs use tall narrow double hungs to meet the escape requirement. Furnishings are often placed under windows making it easier for children to fall out but harder to escape a fire. Even the reasoning used in this code change referenced climbing or standing on furnishings so clearly there is no limit to the danger. Why increase the height eliminating design options if we can't eliminate the danger. Thank you

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Date Submitted:	12-15-11
Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	RB-26
Code Section(s):	IRC R302.5.1
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Health Safety & Welfare, Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

While this is a minor change and a minor cost, this code change will not have the desired results. First, access to the house while carrying items will be much more difficult if the door closes and latches while the home owner is unloading the car. Second, self closing doors (spring hinge) will result in smashed children's fingers more often than they will prevent the spread of fire. Third, most fires occur in the kitchen not in the garage. Finally a closing door may result in falls if an unsteady person is not prepared, and since the code allows no landings in garages some of these falls could be dangerous. I realize my objections are unlikely and mostly minor inconveniences, but the purpose of self closing doors is also unlikely and an additional code requirement we just don't need. Thank You

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2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	12-15-11
Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	RB 105-09/10 & RB154-09/10
Code Section(s):	IRC R802.11
This is a Recommendation:	To Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

This code change corrects a discrepancy in the way the code treats trusses versus rafters. Toenails through truss gusset plates into the top plate create a joint capable of immense uplift loads. Pennsylvania has some problems with wind shear occasionally but even these events do not exceed the 90 mph the designs are for this area. This change would eliminate an additional step (builders install the wind ties after the roof is on) and save potential damage to the truss (5 more nails). Let's simplify the code and spend the money more wisely. Thank You

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**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	12-15-11
Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	RB 104-09/10
Code Section(s):	IRC R602.7.1
This is a Recommendation:	To Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

This code change is so good for so many reasons it almost seems too good to be true. Virtually all builders install vastly oversized headers (2-2X10) everywhere to simplify construction. This code change gives builders and inspectors new, more material efficient, more energy efficient, options for most headers. Builders will now switch to single 2X10 for most openings, saving lumber and allowing as much as R-26 (4" polyiso foam) for 2X6 walls. This idea's time has come and I frankly can't see a downside to giving builders more header options. The plywood header currently allowed by the code has never caught on because of the labor time involved. Adding this option, I believe, will result in an almost universal change in headers almost immediately. Thank You

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Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	NO NUMBER SINCE AN IRC ELECTRICAL PROVISION
Code Section(s):	IRC E3901.11
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

This code change fixes a problem that doesn't exist. These foyers (over 60sq ft) are not rooms they are entries or hallways. As halls one outlet would be required. And the home owner or designer can add more if justified. Adding \$100.00 or more will not guarantee an outlet where you need it. I'm sure each and every one of us has places in our homes where we wish we had an extra outlet, but beyond current code requirements for actual rooms we can't guess where that outlet should be. Thank you

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Date Submitted:	12-15-11
Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	EC-129
Code Section(s):	IRC N1104.1
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Health Safety & Welfare, Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

This code change shows the problem with a one size fits all code. While the increased heat generated by standard light bulbs is a 9 month problem in Florida, it's only a 3 month problem here. Currently fluorescent bulbs are the only readily available alternative to conventional light bulbs. These bulbs, because of their additional cost and supposed danger (their running anti-mercury ads in western Pennsylvania) will never result in a savings because the extra energy saved would just have been released as heat within a thermal envelope that must be heated somehow. On the day LED lighting becomes readily available everything may change, both in the way light is spread (think of solid LED ceiling panels similar to a TV screen, no fixtures at all) or at the very least the Edison based fixture is doomed. We should not now increase the cost of home construction for limited savings, increase dangers, and dated technology. Thank You

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Commonwealth of Pennsylvania
Uniform Construction Code
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Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	EC-109
Code Section(s):	IRC N1103.2.3
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Because of the way homes are built in Pennsylvania, this code change is all cost and no benefit. Using wall and floor spaces for return air in a home with a basement does not result in outside air entering through the building envelope air barrier (there is no pressure differential to move air). Pulling a small amount (cracks at joints in the framing) from unintended areas within the thermal envelope will not increase energy costs or unbalance the house. Most heating systems are a compromise based on the available components and balancing the system to within a degree or two throughout is not essential. In addition having electricians and plumbers unable to cross these return ducts will result in additional expense and may even result in a less efficient heating system if plumbing needs result in longer or more convoluted return piping. Thank You

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Commonwealth of Pennsylvania
 Uniform Construction Code
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Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	EC-27, EC-39, EC-45, & EC-50
Code Section(s):	IRC N1102
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

First I would like to remind you that houses built to the UCC must compete with manufactured housing built to a much lower insulation standard. If raising the insulation requirements results in more people choosing manufactured housing then we have not gained energy savings or safety, we have just reduced the number of new houses we build. Second, while I'm a big proponent of insulation, believing its payback is much better than a bank, I am opposed to the constant code changes. In the 2003 IRC we needed R-49 in our attics. In the 2006 IRC and 2009 IRC we needed R-38 in our attics. Now we are to go back to R-49. Was the code wrong in 2006 and 2009 or is it wrong now? I don't mind looking stupid requiring something different every few years, but I prefer to create my own doubts in contractor's minds. My request is to do as you believe is best with all of the insulation requirements, but then stop changing them. We need to build houses not animosity between builders and inspectors. Thank you

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Commonwealth of Pennsylvania
Uniform Construction Code
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PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	12-15-11
Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	EC-13 Require blower door testing
Code Section(s):	IECC E402.4.1
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

As a building code official, I like code options that result in a choice that give the home owner something for their money. The customer will almost always choose to spend several hundred dollars on an advanced sealing package, which most insulation contractors' offer, over spending several hundred dollars on a blower door test that does not produce any improvement. Allowing the choice of a visual inspection results in a better job almost 100% of the time and will only get better as builders add sealant during construction. A blower door test will also result in better sealing but not because of the test but because of the fear of not passing. Let's spend our limited resources buying an improved product, not testing for our potential failures. Thank you

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Harrisburg, PA 17121

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Submission Method:	Public Hearing: <input type="checkbox"/> Date Received: 12-15-11
	E-Mail: <input checked="" type="checkbox"/>

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Commonwealth of Pennsylvania
Uniform Construction Code
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PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	12-15-11
Proposer's Name	Thomas F McCosby
Company Affiliation (if any):	T W McCosby Construction & Pennsylvania Construction Inspection
Address:	407 Hunt Rd New Castle, PA 16101
Telephone:	724-714-8502
Email:	tfmccosby@comcast.net
ICC Code Change Number:	EC-13 & M-156
Code Section(s):	IECC Table 402.4.1.2 & M1507.1
This is a Recommendation:	To Not Adopt the Change
For the Following Reasons:	Technical Feasibility, Economic & Financial Impacts
(Provide Details Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

To require a house to be sealed to 3 air changes per hour and then ventilated to achieve 5 air changes per hours without requiring energy recovery is perhaps the most offensive example of overreaching that we have seen. This expensive, wasteful, and difficult to enforce code language has nothing to do with safety (the original purpose of the code)

§ 7210.102. Legislative findings and purpose. (b) INTENT AND PURPOSE. - It is the intent of the General Assembly and the purpose of this act:

- (1) To provide standards for the protection of life, health, property and environment and for the safety and welfare of the consumer, general public and the owners and occupants of buildings and structures.

Houses are not static displays where controlling air changes will result in worthwhile savings in every case. The people who live there open doors, run fans, cook fish, and just generally make decisions about how they want to live. The fact that manual controls are to be provided makes it clear these requirements may result in undesired consequences. I mentioned enforcement because as you heard at the third hearing in Cranberry if the inspector fails a house for not meeting these requirements it may not be possible to fix them at any cost, nor to determine who should pay. It's not a problem I want and I don't think is a well thought out code change. An energy recovery system (air to air heat exchanger) is a viable but expensive (\$1,200.00 to \$2,500.00 or more) solution that I've seen in high end housing, but if getting people in new, safer, more energy efficient, housing is the intent and purpose of the code than this is not a code change for Pennsylvania. Thank You

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**Commonwealth of Pennsylvania
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**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	December 15, 2011		
Proposer's Name	John R. Bea		
Company Affiliation (if any):	J.R. Bea Construction		
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Telephone:	570-352-6185		
Email:	info@jrbeaconstruction.com		
ICC Code:			
ICC Code Change Number :			
Code Section(s):	All 2012 code changes		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

Building industry is far to regulated now. We get adapted to the changes and before you know it, it's time for a change again. Please do not adopt any changes.

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Review and Advisory Council**

**PENNSYLVANIA UNIFORM CONSTRUCTION CODE
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Date Submitted:	12/15/11		
Proposer's Name	William A. Kulbacki		
Company Affiliation (if any):	Code Officials Alliance of Pennsylvania		
Address:	819 Lundgren Road - DuBois, PA. 15801		
Telephone:	814-591-4004		
Email:	klbifam@verizon.net		
ICC Code:	All		
ICC Code Change Number :	All		
Code Section(s):	All		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

I am President of the Code Officials Alliance of Pennsylvania (COAP). Our organization strongly urges that the current 2009 I-Codes adopted by the PA. UCC remain in place. We feel that no 2012 code change should be pursued due to economic and financial impacts of the changes. While many of the changes are minor or are editorial, adopting the 2012 codes will place a financial burden on all who must attend training and purchase code books, revise their forms and standards, and change their methods of proving compliance. At a time when building is slow, many are just becoming comfortable with the 2009 codes. To ask everyone including code officials, municipalities, design professionals and contractors to revise their processes for minor revisions is an imposing financial burden that many cannot afford in this current economic climate.

An exception to the minor revisions are the proposed EC13 and RE4. We have serious

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health concerns with the requirement to tightly seal buildings until there is almost no natural fresh air movement. The code requires minimal exhaust through bath fans or fresh air dumped into the return air side of a forced air heating system, without concerns for balancing supply and return. Exhaust-only systems are the only way to meet the code for a non-ducted heating system without adding another system. These new requirements could easily permit a code compliant but unhealthy home. The code suggests, but does not require, whole house ventilating systems which would be healthier, but add to the construction and monthly energy costs. The conceptual idea of the tightening proposal does not appear to make common sense. If present air movement in homes provides minimal, adequate amounts of natural fresh air, why would it be necessary to tighten up a home to the extent you will have to use additional energy to provide mechanically induced fresh air?

These provisions place an increased financial burden on the homeowner and may in fact decrease the health of a home built to the code's minimal standards.

Thank you for your time and consideration.

William A. Kulbacki

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2012 CODE CHANGE RECOMMENDATION FORM**

Date Submitted:	December 16, 2011		
Proposer's Name	Nicholas R. Rado		
Company Affiliation (if any):	Indiana County Office of Planning & Development		
Address:	801 Water Street, Indiana, PA 15701		
Telephone:	724-465-3870, Cell: 724-840-6073		
Email:	nrado@ceo.co.indiana.pa.us		
ICC Code:	ALL		
ICC Code Change Number :	ALL		
Code Section(s):	ALL		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

As BCO for 27 municipalities in Indiana County I strongly recommend that we DO NOT adopt the 2012 International Residential Codes. As I testified at the Cranberry Code Hearing, the adoption of the proposed 2012 code changes will further cripple our fragile housing industry at a time that we should do everything possible to strengthen it. It is an undeniable fact that these changes will have a negative effect on the housing industry as well as the entire economy as businesses struggle, jobs are lost and many families can no longer afford the dream of home ownership. Please consider the facts before making a decision to approve these costly regulations as they do not deal with life/safety issues.

Thank You
Nick Rado



Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
Bureau of Occupational & Industrial Safety
Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

		RAC Use Only		
Submission Method:	Public Hearing	TESTIFIED 11-9-11	Date Received:	12-16-11
	E-Mail: <input checked="" type="checkbox"/>			

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Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

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PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	12-13-11		
Proposer's Name	RUSS KIEL		
Company Affiliation (if any):	RUSS KIEL CONST. CO (PA 014550)		
Address:	103 SPRUCE ST. PORTAGE, PA 15946		
Telephone:	814 736 3716		
Email:	KIELCONST@201.COM		
ICC Code:	RB26-09/10		
ICC Code Change Number :	R 302.5.1		
Code Section(s):	+ ALL NEW CODES		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input checked="" type="checkbox"/> Economic and Financial Impacts	<input type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

THESE CODES ARE REALLY DESTROYING THE BUILDING INDUSTRY. I HAVE BEEN A CONTRACTOR FOR 32 YEARS. THESE CODES ARE CUMBERSOME, OVERBEARING, CONFUSING & ANYTHING BUT "UNIFORM." THIS IS EVIDENCED BY THE NUMBER OF BUILDING PERMITS THAT WERE ISSUED JUST BEFORE THE (NOW DEFUNCT) SPRINKLER LAW, THAT THERE WERE ALMOST NO BLDG. PERMITS IN THE SHORT TIME THAT THE SPRINKLER SYSTEM WAS IN EFFECT - SPEAR VOLUMNS.

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THANK YOU,
 RUSS KIEL

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RAC Use Only		
Submission Method:	Public Hearing:	Date Received:
	E-Mail: MAIL	12-16-11

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	December 17, 2011		
Proposer's Name	Frank Zokaite		
Company Affiliation (if any):	Zokaite Contracting Inc		
Address:	375 Golfside Drive Wexford Pa 15090		
Telephone:	724-935-5257		
Email:	frz@comcast.net		
ICC Code:	2012 IRC		
ICC Code Change Number :	All 2012 changes		
Code Section(s):	All 2012 code changes		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
	<input type="checkbox"/> Economic and Financial Impacts	<input checked="" type="checkbox"/> Other (Specify Below)	

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

In the few years since Pennsylvania adopted and started enforcing a much needed statewide building code (2004-2012) Pennsylvania will be looking at its fourth major change to the building code. Not only is this costly to the builders, designers, tradesmen and building inspectors who have to purchase new code books (an intended desire of the ICC code publishing company) and attend training programs to learn about the changes, but it is very costly to the consumer who has had to accept the burden of the added cost these changes bring to the cost of construction. The 2003 code was adequate and provided sufficient protection to consumers. The current 2009 code, as amended by Pa. should remain in place as it is for the foreseeable future. Please remember the fire sprinkler fiasco that was caused by the code company.

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 Harrisburg, PA 17121

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Submission Method:	Public Hearing: <input type="checkbox"/> E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-17-11

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Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	December 19, 2011	
Proposer's Name	Lehigh Valley Builders Association	
Company Affiliation (if any):		
Address:	1524 Linden Street, Allentown PA 18102	
Telephone:	(610) 432-4101	
Email:	lvba@lvba.org	
ICC Code:	2012 IRC	
ICC Code Change Number :		
Code Section(s):	All code changes.	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons: (Provide Details Below)	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
	<input type="checkbox"/> Economic and Financial Impacts	<input checked="" type="checkbox"/> Other (Specify Below)

Detailed reasons for your recommendation. Provide relevant data to support your position when possible.

See attached commentary.

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 Department of Labor and Industry
 651 Boas Street, Room 1613
 Harrisburg, PA 17121

	RAC Use Only	
Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-19-11



Lehigh Valley Builders Association

1524 LINDEN STREET • ALLENTOWN, PA 18102

phone: 610-432-4101 • fax: 610-432-2923 • email: lvba@lvba.org

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM
COMMENTARY

The Lehigh Valley Builders Association (LVBA) respectfully requests that the Review and Advisory Council forgo any changes to the current Pennsylvania Uniform Construction Code – specifically as those changes might relate to the 2012 International Residential Code (IRC). It is our position that adopting the 2012 IRC code changes will undermine the public welfare as well as construction economics.

The repeated broad revisions of the state building codes – occurring in 2003, 2006, and 2009 – have created an unpredictable code environment. Previous changes were not mere tweaks to the building codes, but rather, they have been routinely substantial and often comprehensive changes of past practices. Such is the situation again with the long list of changes contained in the 2012 IRC. Consequently, the learning curve to achieve code proficiency for both the construction industry and the inspection community has been reset every three years as we attempt to re-educate ourselves on what current provisions require. This continued state of flux has produced uncertainty in the application of code provisions.

Forgoing any changes contained in the 2012 IRC will permit the full absorption of the existing code requirements which, it should be remembered, only went into effect fewer than 24 months ago. The compressed learning timeframe for the 2009 IRC provisions has been exacerbated by the current state of the home building market. Fewer opportunities to build and inspect new construction have prevented the robust implementation of existing codes in the field thereby limiting a nuanced appreciation of current requirements. Beyond practitioner education, adequate time is also needed to gain the necessary experience with the existing codes to truly understand which provisions need to be changed and which should be left alone.

Generation skipping of a triennial code benefits construction predictability and uniformity. Greater predictability and uniformity enable not only cost containment measures for the building industry, but also, they elevate safety protection through a more knowledgeable inspection process.

While each publication of the triennial code books seems to always promise hundreds upon hundreds of changes to the I-codes, Pennsylvania should exercise greater prudence and permit a full understanding of the strengths and weaknesses within our current codes before adopting yet another long list of changes to the Uniform Construction Code.

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