

**Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council**

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

Date Submitted:	12/27/2011	
Proposer's Name	Sean Cleary	
Company Affiliation (if any):		
Address:	102 Abby Way, Scranton Pa 18504	
Telephone:	909-996-5336	
Email:	sean.cleary@iapmo.org	
ICC Code:	IPC	
ICC Code Change Number :	P123-09/10	
Code Section(s):	901.3, 917.8, and Chapter 13	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input checked="" type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<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.

Chemical waste system may contain toxic and dangerous fumes which upon failure of an air admittance can cause sickness or even death. Air Admittance valves are mechanical devices which will fail at some time in the life of the system. The code contains no requirement for future testing or maintenance of these mechanical devices after their installation is approved.

Within chapter 13 remove references to ASSE 1049-2009 and ASTM F1412-01

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Bureau of Occupational & Industrial Safety
Department of Labor and Industry
651 Boas Street, Room 1613
Harrisburg, PA 17121

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Submission Method:	Public Hearing: <input type="checkbox"/> E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-27-11

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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:	12/28/11		
Proposer's Name	Shannon Cawley		
Company Affiliation (if any):	Kay Builders, Inc.		
Address:	5930 Hamilton Blvd., Allentown, PA 18106		
Telephone:	610-395-6857		
Email:	ShannonC@KayBuilders.com		
ICC Code:	IRC		
ICC Code Change Number :	EC-112		
Code Section(s):	N1103.4		
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.

Our plumber quoted Materials & Labor to be approximately \$274 for an average sized home. The hot water pipes contained within the building thermal envelope are not exposed to outside temperatures being in a conditioned space. It doesn't seem logical to increase the price of a home \$400 (after overhead for management & nominal profit margin) to insulate pipes that are within the building thermal envelope, no matter what the pipe length or size. Every dollar we can save a new home buyer in purchase price is important for market recovery.

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Subject: FW: 2012 Code Change Recommendations

From: "LI, UCCRAC" <RA-UCCRAC@pa.gov>

Date: 12/28/2011 8:40 AM

To: "Smith, Kelly K (LI-OCC)" <kellysmith@pa.gov>, "uccrac@comcast.net" <uccrac@comcast.net>

From: Rick Koze[SMTP:RICKKOZE@HOTMAIL.COM]

Sent: Wednesday, December 28, 2011 8:40:30 AM

To: LI, UCCRAC

Subject: FW: 2012 Code Change Recommendations

Auto forwarded by a Rule

To whom it may concern:

I am the President and Owner of Kay Builders, Inc., a homebuilder located in Allentown PA. Our local homebuilders association, LVBA forwarded the 2012 IRC sneak preview to us and they indicated that we could comment on the proposed code changes before December 31, 2011.

As such, I have attached some of our objections to the proposed code and request that you review these requests.

In the spirit of being somewhat cooperative, I am sending along my most significant objections, but I will add that there simply should be NO code changes for the foreseeable future. Homebuilders can't handle the increased costs, the economy can't handle the negative impact of the increases, and the consumer simply does not care one bit if the ICC mandates certain code changes.

I will summarize my view on the code process in general. I am very happy that we have created a review process in our state that gives builders some say in what parts of the IRC are adopted. I would consider that change to be responsive government.

However, I want to point out my complete disdain for the ICC (International Code Council) who I see as an organization that instills change to promulgate their existence. I consider this organization the ultimate bureaucratic entity which serves no purpose but self preservation. It is clear they rewrite their codes every three years to make money at the expense of the general economy and the public. They do this under the veil of promoting energy efficiency and health and safety, but I have not once seen a cost-benefit analysis that shows the benefit of making me as a homebuilder spend more to build a home, and I have not once seen a poll of consumers which supports their willingness to pay for code changes. The ICC is Big Brother in its purest form. The code should not be reviewed every three years and changes should be filtered significantly by the new review process.

Thank You,

Richard Koze
President
Kay Builders, Inc.

From: shannonc@kaybuilders.com

To: [rickkoze@hotmail.com](mailto:rckkoze@hotmail.com)

Subject: 2012 Code Change Recommendations

**Commonwealth of Pennsylvania
Uniform Construction Code
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Company Affiliation (if any):	Kay Builders, Inc.		
Address:	5930 Hamilton Blvd., Allentown, PA 18106		
Telephone:	610-395-6857		
Email:	ShannonC@KayBuilders.com		
ICC Code:	IRC-2012		
ICC Code Change Number :	RP-1		
Code Section(s):	P2503.5.1: Air Test - Plastic DWV Systems		
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 checked="" 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.

In cold climates, it is not always feasible to perform a water test on DWV systems. Freezing is an issue whereas air testing poses no freeze threat. It might be prudent to require certain precautions to reduce risks associated with air testing, but the building code should allow a choice as it historically has, for the testing method preference, or set safety parameters to follow in the event air testing is preferred.

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Address:	5930 Hamilton Blvd., Allentown, PA 18106		
Telephone:	610-395-6857		
Email:	ShannonC@KayBuilders.com		
ICC Code:	IRC		
ICC Code Change Number :	RM-10		
Code Section(s):	M1506.2		
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 checked="" 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.

Changing the clearance requirement for Exhaust Openings to include non-operable will be not only cumbersome for locating vent openings, but in some townhouse scenerios, it may be impossible to comply with, given limited wall space, and number of exhaust, intake, mechanical, electrical, etc. clearances to consider. If a fixed window or door panel is the current installation, and a homeowner wants to change that in the future, it should be determined at that time if it is possible or not, as opposed to building today for "what-ifs" in the future. We can't predict all building changes in the future, and therefore shouldn't be burdened today with other possible scenerios.

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Address:	5930 Hamilton Blvd., Allentown, PA 18106		
Telephone:	610-395-6857		
Email:	ShannonC@KayBuilders.com		
ICC Code:	IRC		
ICC Code Change Number :	EC-12 SHOULD BE EC-129 Pt 2		
Code Section(s):	N1104.1		
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.

Our lighting supplier Materials to be approximately \$170 for an average sized home to be equipped with 75% cfl bulbs versus 50%. It doesn't seem logical to increase the price of a home \$240 (after overhead for management & nominal profit margin) to increase the number of high efficacy bulbs installed in every home. Every dollar we can save a new home buyer in purchase price is important for market recovery.

Furthermore, there is substantial and legitimate concern regarding safety of cfl bulbs. Builders, being price conscious, will tend to acquire lower quality/price cfl bulbs, which tend to be the more hazardous ones.

Also, we have experienced homeowner dissatisfaction with the quality of light produced by cfl bulbs, which leads owners to replace them with incandescent or halogen bulbs after occupying the home. That is counterproductive to the intent of the code.

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Telephone:	610-395-6857		
Email:	ShannonC@KayBuilders.com		
ICC Code:	IRC-2012		
ICC Code Change Number :	EC-13 Pt 2 ?		
Code Section(s):	Energy: Envelope Requirements		
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.

Changing attic insulation from R-38 to R-49 is a 28.9% increase. The thickness and price of insulation increase is linear. Our insulator quoted the cost, by today's market, to increase ceiling insulation in an average sized home will be \$255. The depth of blown fiberglass increases from 15" to 20". It doesn't make sense to increase the cost of a new home \$370 (after overhead for management and nominal profit margin) to increase the insulation value, considering it is already 27% better than the 2006 code, which saw a tremendous number of homes built, compared to the relatively few homes built under current the code. Every dollar we can save a new home buyer in purchase price is important for market recovery.

Basement Wall R-Value: R-15 insulative blankets do not exist for application to basement wall interiors in lieu of currently required R-10. We install R-11 blankets, which is 10% better than code requires. 50% increase over current requirements is an

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unreasonably huge jump in R-value and would be difficult or impossible to comply with.

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Telephone:	610-395-6857		
Email:	ShannonC@KayBuilders.com		
ICC Code:	IECC		
ICC Code Change Number :	EC-13 Pt 1		
Code Section(s):	402.4.2.1		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
(Provide Details Below)	<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.

Our insulator quoted Materials & Labor to be approximately \$625 for an average sized home to be blower door tested. The current code allows the code official to choose whether or not to require a blower door test to be conducted. It doesn't seem logical to raise the price of every home \$910 (after overhead for management and nominal profit margin) to ensure via testing and certification that every home is within the required tolerance of tightness. The current code allows for visual inspection and the code official can request testing if they so choose. It seems logical to allow a building official that leeway, considering we build every home with the same method, and therefore find almost identical test results for each of our homes. Why not allow the inspector to spot or periodically test, or request it if needed after visual inspection, as opposed to every home?

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Email:	ShannonC@KayBuilders.com		
ICC Code:	IRC-2012		
ICC Code Change Number :	RB-170		
Code Section(s):	R905.2.8.5: Drip Edge		
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.

Our roofer quoted Materials & Labor to be approximately \$125 for an average sized home. Drip edge, historically, has never been a building code requirement. Roofing manufacturer's do not require drip edge for full warranty service. It may be a prudent practice to install drip edge during roofing application, but roof longevity doesn't depend on drip edge being installed. It doesn't seem logical to increase the price of a home \$182 (after overhead for management & nominal profit margin) to include drip edge on a roof that does nothing to ensure or increase life expectancy of the roof application. Every dollar we can save a new home buyer in purchase price is important for market recovery.

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PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	December 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IRC		
ICC Code Change Number :	EC 109		
Code Section(s):	IRC N 1103.2.3		
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.

Building cavities in exterior walls and outside of the conditioned space are currently not permitted to be used as ducts. Utilizing building cavities within the thermal envelope inside the conditioned space have little if any negative effect on the heating or cooling of this space. This change will dramatically increase the cost of installing an HVAC system with no positive benefit for the homeowner. We would ask that the RAC disapprove this code change and retain the 2009 standards.

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600 N. 12th Street • Lemoyne, Pennsylvania 17043
717.730.4380 • 800.692.7339 • 717.730.4396 (Fax) • Internet: PaBuilders.org

President Ray Venema West Branch Susq. BA	Vice President Warren Peter Indiana-Armstrong BA	Associate Vice President Ron Agulnick HBA of Chester/Delaware	Treasurer Richard Clawson Indiana-Armstrong BA	Secretary Larry Eberly Franklin County BA
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December 28, 2011

Mr. Frank C. Thompson, Chairman
Uniform Construction Code
Review and Advisory Council
Bureau of Occupational & Industrial Safety
Department of Labor & Industry
651 Boas Street, Room 1613
Harrisburg Pa. 17121

RE: 2012 I-code submission forms

Dear Mr. Thompson,

Please accept the attached Pennsylvania UCC 2012 Code Change recommendation forms as submissions from the Pennsylvania Builders Association. We would ask that you consider the following code changes as controversial and exclude them from adoption into the UCC.RB-26, RB-43, RB-122 pt. 2, RB-138, EC-13, EC-27, EC-39, EC-45, EC-50, EC-109, EC-112, EC 129, P-79, M-156, RM-10, and RP-1. I could not locate a code change number for the change in E-3901.7 in the 2012 IRC, but I included a form for that also.

We would also ask that you consider M-35, RP-11, and RM-38, for adoption into the 2012 UCC as we believe these code changes could make a positive impact within the code.

Thank you for your consideration in this matter, and we look forward to working with you and your council to help make the Uniform Construction Code a reasonable code that works for all Pennsylvanians.

Sincerely,

Jerry Leach

Jerry Leach
Director of Building Codes
Pennsylvania Builders Association

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Proposer's Name	Jerry Leach	
Company Affiliation (if any):	Pennsylvania Builders Association	
Address:	600 N. 12th Street, Lemoyne, PA 17043	
Telephone:	717-368-8850	
Email:	jleach@pabuilders.org	
ICC Code:	IECC/ IRC	
ICC Code Change Number :	EC 50	
Code Section(s):	Tables 402.1.1, 402.1.3 IRC Tables 1102.1, N 1102.1.2	
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.

This code change is simply more of the same, a continued ramp up of R values that benefit certain proprietary materials and eliminate products with years of proven performance. We ask that the RAC disapprove this code change and retain the 2009 energy standards found in those tables.

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Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IECC / IRC		
ICC Code Change Number :	EC 39		
Code Section(s):	IECC Table 402.1.1, 402.1.3, IRC 1102.1.3		
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.

Increased U factors in fenestration products will simply add costs that benefit the manufacturers who were involved in the code change submitted. The 2009 Energy codes were linked to federal funds that were handed down to states that adopted the 2009 energy codes by 2017. Pennsylvania has done that and there is no reason to consider an increase in 2012 when we are already at a federal government 2017 standard. We ask that the RAC disapprove this code change.

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Telephone:	717-368-8850	
Email:	jleach@pabuilders.org	
ICC Code:	IECC	
ICC Code Change Number :	EC 45	
Code Section(s):	Table 402.1.1 / 402.1.3	
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.

The wood frame wall R-value increases found in EC 45 provide a market advantage to a few primary building materials while they will exclude some products that have been proven and widely used in the construction industry for years. These changes will have an adverse effect on the affordability of a new home; therefore we ask that the RAC disapprove this code change.

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Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IECC / IRC		
ICC Code Change Number :	EC 27		
Code Section(s):	Tables 402.1.1, 402.1.3, IRC tables N 1102.1, N 1102.1.2., N1102.2.5		
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change	
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility	
(Provide Details Below)	<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.

There is no substantial data to suggest that the energy cost savings warrant this increase in basement wall insulation R-values. Additionally over insulating basement walls can increase moisture problems in colder climate areas. If it goes undetected and a finished wall is installed the moisture problem will likely create a rot and possibly a mold problem. The current insulation values found in the 2009 IRC are sufficient therefore we request that the RAC disapprove this code change.

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Email:	jleach@pabuilders.org	
ICC Code:	IRC	
ICC Code Change Number :	RM 10	
Code Section(s):	IRC M 1506.2	
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.

The idea that we need to protect fixed glass opening because some day someone may replace that window with an operable window is preposterous. This is just another example of the code thinking too much in a "what if" train of thought. We ask that you disapprove of this code change.

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-28-11

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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 27, 2011	
Proposer's Name	Jerry Leach	
Company Affiliation (if any):	Pennsylvania Builders Association	
Address:	600 N. 12th Street, Lemoyne, PA 17043	
Telephone:	717-368-8850	
Email:	jleach@pabuilders.org	
ICC Code:	IMC, IRC, IBC	
ICC Code Change Number :	M 156	
Code Section(s):	IMC 401.2, IBC 1203.1, R 303.4	
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.

This code change is tied to EC-13 as a requirement of mechanical make up air due to making the house too tight by lowering the ach from 7 in 2009 to 5 ach in 2012. Let's return some common sense to the code and reject this unnecessary and costly change and retain the 2009 standards.

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-28-11

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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 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IPC		
ICC Code Change Number :	P-79		
Code Section(s):	607.2		
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.

The new language found in 607.2 will simply not be practical in certain home designs. Limiting the allowable length from 100 feet to 50 feet will often require a separate water heating source adding more costs to the home with little benefit. We ask that the RAC disapprove this code change.

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-28-11

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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:	December 27, 2011	
Proposer's Name	Jerry Leach	
Company Affiliation (if any):	Pennsylvania Builders Association	
Address:	600 N. 12th Street, Lemoyne, PA 17043	
Telephone:	717-368-8850	
Email:	jleach@pabuilders.org	
ICC Code:	IRC / IECC	
ICC Code Change Number :	EC 129	
Code Section(s):	IECC 404.1, IRC R202, N 1104.1	
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.

This is another example of government intrusion stripping away consumer choice in the name of energy efficiency. While new technology lamps such as CFL's and LED's may be a more energy efficient product than an incandescent lamp, the same benefit can be reached by the homeowner through the use of a dimmer switch. CFL's also come with special handling and disposal requirements that will likely end up being ignored by the end consumer. We ask that the RAC disapprove this code change.

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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:	December 27, 2011	
Proposer's Name	Jerry Leach	
Company Affiliation (if any):	Pennsylvania Builders Association	
Address:	600 N. 12th Street, Lemoyne, PA 17043	
Telephone:	717-368-8850	
Email:	jleach@pabuilders.org	
ICC Code:	IECC / IRC	
ICC Code Change Number :	EC 112	
Code Section(s):	IECC 403.4, 403.1, 403.4.2, IRC N 1103.4, 1103.4.1, 1103.4.2	
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.

This code change is simply another cost with little benefit to the consumer. We ask that the RAC disapprove this code change and retain the 2009 standard.

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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:	December 27, 2011	
Proposer's Name	Jerry Leach	
Company Affiliation (if any):	Pennsylvania Builders Association	
Address:	600 N. 12th Street, Lemoyne, PA 17043	
Telephone:	717-368-8850	
Email:	jleach@pabuilders.org	
ICC Code:	IRC / IECC	
ICC Code Change Number :	EC 13	
Code Section(s):	IRC N 1102.4.1.2 / 401.2 IECC Table- 402.1.1 – 402.4.1.2	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input type="checkbox"/> Technical Feasibility
(Provide Details Below)	<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.

Taking the option of a visual inspection away and replacing it with a mandatory blower door test could possibly result in a poorer installation practice due to the lack of extra oversight with the end result being a test that could reveal a lower level than the code requires that may now be unachievable. Blower door test should remain a builder/consumer choice.

Further increasing R- values in climate zones 4,5, and 6 which cover Pennsylvania is another example of an over-reaching code change with little or no value to the end user while increasing costs up front. The wood frame wall requirements in climate zone 6 will limit construction framing options by requiring insulated sheathing on the exterior of the wall regardless of the amount of cavity insulation a builder may use.

To move the air leakage requirement from 7 ach to 5 ach is not only unrealistic but also a contradiction in code when achieving that level will then require the installation of a mechanical means of make-up air to help insure the "health" of the home. We ask that

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the RAC disapprove all of the code changes to the IRC and IECC as found in EC 13.

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

Date Submitted:	December 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IRC		
ICC Code Change Number :	RB 26		
Code Section(s):	R 302.5.1		
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.

The requirement for door closures between the home and an attached garage is not supported by any reliable data or statistics of life savings from either fire or carbon monoxide poisoning. This code change will result in injuries to child's fingers getting caught in the door and the overall inconvenience will likely cause the homeowner to disable the device. It is just another example of an unnecessary code change that will add a cost to the home with no additional benefit. We request disapproval of this code change by the RAC.

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Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	December 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IBC		
ICC Code Change Number :	RB 122 pt. 2		
Code Section(s):	B 1013.8		
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.

This code change to the IBC simply causes confusion as it is inconsistent with the IRC. The restriction found in the 2012 IRC remains at 24" above the finished floor for one and two family dwellings while this code change found in the IBC would raise the restriction to 36" above the finished floor in occupancy groups R-2 and R-3 one and two family dwellings. For this reason we recommend disapproval of this code change by the RAC.

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Submission Method:	Public Hearing:		Date Received: (2-28-11)
	E-Mail: <input checked="" type="checkbox"/>		

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Uniform Construction Code
Review and Advisory Council**

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

Date Submitted:	December 27, 2011	
Proposer's Name	Jerry Leach	
Company Affiliation (if any):	Pennsylvania Builders Association	
Address:	600 N. 12th Street, Lemoyne, PA 17043	
Telephone:	717-368-8850	
Email:	jleach@pabuilders.org	
ICC Code:	IRC	
ICC Code Change Number :	RB 138	
Code Section(s):	R 703.8	
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.

While this code change would appear to be simple and have little or no effect on costs, simply changing the word "mortar" to "grout" in this code section will result in a change in the way brick masonry is installed and likely result in increased labor costs that will be passed on to the buyer, we ask that the RAC disapprove this code change as it is unneeded.

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-28-11

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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 27, 2011	
Proposer's Name	Jerry Leach	
Company Affiliation (if any):	Pennsylvania Builders Association	
Address:	600 N. 12th Street, Lemoyne, PA 17043	
Telephone:	717-368-8850	
Email:	jleach@pabuilders.org	
ICC Code:	IRC	
ICC Code Change Number :	RB 43	
Code Section(s):	R 310.2.2	
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.

This code change is another example of a change for change sake. There does not appear to be any reported incidence of flooding due to improperly installed window wells or drainage systems, and depending upon the code official's interpretation and enforcement this could again add unneeded costs with little or no benefit, therefore we request disapproval of this code change by the RAC.

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-28-11

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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:	December 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IRC		
ICC Code Change Number :			
Code Section(s):	E- 3901.7		
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.

The requirement of an electrical outlet on an exterior deck, regardless of size is an unnecessary change; current language found in the 2009 code triggers the requirement at 20 sf or greater seems more reasonable. We ask that the RAC disapproves this code change.

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-28-11

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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 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IRC		
ICC Code Change Number :	RM 38		
Code Section(s):	M 2301		
This is a Recommendation:	<input checked="" type="checkbox"/> To Adopt the Change	<input 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.

This code change provides standards for solar photovoltaic which were not defined in the 2009 code. We ask that the RAC consider adoption of this code change.

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PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	December 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IRC		
ICC Code Change Number :	M 35 part 2		
Code Section(s):	504.4, 504.6.2		
This is a Recommendation:	<input checked="" type="checkbox"/> To Adopt the Change	<input 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.

This code change corrects an inconsistency found in the 2009 code which provided for different dryer duct lengths between the IRC, IMC, and the IFGC. This code change will make all three codes consistent with one and another. We ask that the RAC consider adoption of this code change.

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Submission Method:	Public Hearing: <input type="checkbox"/> E-Mail: <input checked="" type="checkbox"/>		Date Received: 12-28-11

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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 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IRC		
ICC Code Change Number :	RP-11		
Code Section(s):	P-2904.1		
This is a Recommendation:	<input checked="" type="checkbox"/> To Adopt the Change	<input 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.

This code change helps clear up some confusion between code officials, builders, and sprinkler contractors that has occurred following the passage of Act 1, of 2011 which repealed the sprinkler requirements in one and two family dwellings in Pennsylvania. The code change proponent is the original author of P2904 which provides the standards to which residential sprinkler systems may be installed. RP-11 simply clarifies that this system can be installed as a partial system in buildings not required to be equipped with a residential sprinkler system (one and two family homes in Pa.) We ask that the RAC consider adoption of this code change.

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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 27, 2011		
Proposer's Name	Jerry Leach		
Company Affiliation (if any):	Pennsylvania Builders Association		
Address:	600 N. 12th Street, Lemoyne, PA 17043		
Telephone:	717-368-8850		
Email:	jleach@pabuilders.org		
ICC Code:	IPC		
ICC Code Change Number :	RP 1		
Code Section(s):	P 312.3		
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.

The elimination of air testing of plastic pipe will cause increased delays in the inspection process during freezing temperatures thus delaying construction and likely increasing costs. 5 psi for testing plastic pipe is considered safe and should remain an allowable method of testing for all pipe not just non-plastic pipes.

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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:	28 December 2011	
Proposer's Name	Pekka Hakkarainen	
Company Affiliation (if any):	Lutron Electronics Co., Inc.	
Address:	7200 Suter Road, Coopersburg PA 18036	
Telephone:	610 282 6766	
Email:	phakkarainen@lutron.com	
ICC Code:	International Residential Code (IRC)	
ICC Code Change Number :	EC 129-09/10-Part II	
Code Section(s):	N1104.1	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input checked="" type="checkbox"/> Technical Feasibility
(Provide Details Below)	<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.

We oppose the adoption of this code change with the following substantiation:

- Lighting represents anywhere between an estimated 9 and 14% of residential electricity use, depending on which reference one wishes to cite. This percentage is much smaller than in commercial buildings, for example in office buildings lighting is about 39% of electricity use. Therefore, the energy savings impact of limiting lamp choices to high efficacy lamps is not nearly as substantial as in commercial buildings.
- The new code limits consumer choice and is inconsistent with national product standards. (See also Act 45 of 1999, Section 102 (b)(2))
 1. The language in the code requires CFLs or LEDs.
 2. However, halogen lamps are federally regulated and commonly available for purchase in PA.

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3. In addition, the Council should be aware that there is a current PA House Bill (H.B. 1622) that would exempt incandescent lamps manufactured in PA from federal standards - probably indicating general unhappiness with the performance of high efficacy lamps that are required by the new code, and a desire to keep the old incandescent lamps - which are starting to be phased out in federal standards on January 1, 2012 - widely available to Pennsylvania consumers.

- The US Department of Energy has documented "consumer dissatisfiers" for CFLs. (Compact Fluorescent Lighting in America: Lessons Learned on the Way to Market, prepared by Pacific Northwest National Laboratory, June 2006). Therefore, we feel that it is inappropriate at this time to mandate the use of these lamps as widely as the code language requires. These "dissatisfiers" include the following technical problems (see Act 106 of 2008, section (d)(1)):

1. the poor color appearance and color rendering of many CFLs,
2. the warm-up time to reach full light output when a CFL is turned on is unacceptably long,
3. mercury content and clean-up problems after breakage as well as disposal/recycling problems after the end of lamp life,
4. incompatibility with dimmers and electronic switches.

- LEDs are not yet a mature technology and are too expensive (not economically reasonable - see Act 106 of 2008, section (d)(1)) to be a significant factor in residential applications. LED product performance is also highly variable due to lack of industry standardization.

- The intent of the code can easily be defeated if the home owner takes out the CFLs after the inspector leaves and replaces them with - say - halogen lamps.

In conclusion, the new code language inconveniences the consumer the most. Most home builders probably do not have a strong opinion about this requirement, because it does not significantly impact the cost of a typical home, and because it is very easy to "fix" the installation after the inspector has departed whenever the home owner has objections: the builder needs to just give the home owner instructions to remove the CFLs and replace them with lamps that they like after they receive the certificate of occupancy.

Lamp manufacturers likely do not have an opinion. If anything the new code might cause consumers to buy more than one lamp for each socket. Lighting control manufacturers, such as Lutron, can easily address this problem with after market sales of dimmers and occupancy sensors for whatever lamps the home owner decides to use.

The best way to solve this in code would be to give the home owner the option of using either high efficacy lamps or standard lamps with appropriate lighting controls. This would assure improved energy efficiency for the home. However, with this option not available, the most sensible approach is to not adopt the new residential lighting requirement in IECC 2012, and we urge the Council to do exactly that.

Commonwealth of Pennsylvania
Uniform Construction Code
Review and Advisory Council

PENNSYLVANIA UNIFORM CONSTRUCTION CODE
2012 CODE CHANGE RECOMMENDATION FORM

Date Submitted:	28 December 2011	
Proposer's Name	Pekka Hakkarainen	
Company Affiliation (if any):	Lutron Electronics Co., Inc.	
Address:	7200 Suter Road, Coopersburg PA 18036	
Telephone:	610 282 6766	
Email:	phakkarainen@lutron.com	
ICC Code:	International Energy Conservation Code (IECC)	
ICC Code Change Number :	EC 129-09/10-Part I	
Code Section(s):	404.1	
This is a Recommendation:	<input type="checkbox"/> To Adopt the Change	<input checked="" type="checkbox"/> To Not Adopt the Change
For the Following Reasons:	<input type="checkbox"/> Health Safety and Welfare	<input checked="" type="checkbox"/> Technical Feasibility
(Provide Details Below)	<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.

We oppose the adoption of this code change with the following substantiation:

- Lighting represents anywhere between an estimated 9 and 14% of residential electricity use, depending on which reference one wishes to cite. This percentage is much smaller than in commercial buildings, for example in office buildings lighting is about 39% of electricity use. Therefore, the energy savings impact of limiting lamp choices to high efficacy lamps is not nearly as substantial as in commercial buildings.

- The new code limits consumer choice and is inconsistent with national product standards. (See also Act 45 of 1999, Section 102 (b)(2))
 1. The language in the code requires CFLs or LEDs.
 2. However, halogen lamps are federally regulated and commonly available for purchase in PA.

Completed forms may be e-mailed to ra-uccrac@pa.gov or mailed to:
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 Department of Labor and Industry
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 Harrisburg, PA 17121

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3. In addition, the Council should be aware that there is a current PA House Bill (H.B. 1622) that would exempt incandescent lamps manufactured in PA from federal standards - probably indicating general unhappiness with the performance of high efficacy lamps that are required by the new code, and a desire to keep the old incandescent lamps - which are starting to be phased out in federal standards on January 1, 2012 - widely available to Pennsylvania consumers.

- The US Department of Energy has documented "consumer dissatisfiers" for CFLs. (Compact Fluorescent Lighting in America: Lessons Learned on the Way to Market, prepared by Pacific Northwest National Laboratory, June 2006). Therefore, we feel that it is inappropriate at this time to mandate the use of these lamps as widely as the code language requires. These "dissatisfiers" include the following technical problems (see Act 106 of 2008, section (d)(1)):

1. the poor color appearance and color rendering of many CFLs,
2. the warm-up time to reach full light output when a CFL is turned on is unacceptably long,
3. mercury content and clean-up problems after breakage as well as disposal/recycling problems after the end of lamp life,
4. incompatibility with dimmers and electronic switches.

- LEDs are not yet a mature technology and are too expensive (not economically reasonable - see Act 106 of 2008, section (d)(1)) to be a significant factor in residential applications. LED product performance is also highly variable due to lack of industry standardization.

- The intent of the code can easily be defeated if the home owner takes out the CFLs after the inspector leaves and replaces them with - say - halogen lamps.

In conclusion, the new code language inconveniences the consumer the most. Most home builders probably do not have a strong opinion about this requirement, because it does not significantly impact the cost of a typical home, and because it is very easy to "fix" the installation after the inspector has departed whenever the home owner has objections: the builder needs to just give the home owner instructions to remove the CFLs and replace them with lamps that they like after they receive the certificate of occupancy.

Lamp manufacturers likely do not have an opinion. If anything the new code might cause consumers to buy more than one lamp for each socket. Lighting control manufacturers, such as Lutron, can easily address this problem with after market sales of dimmers and occupancy sensors for whatever lamps the home owner decides to use.

The best way to solve this in code would be to give the home owner the option of using either high efficacy lamps or standard lamps with appropriate lighting controls. This would assure improved energy efficiency for the home. However, with this option not available, the most sensible approach is to not adopt the new residential lighting requirement in IECC 2012, and we urge the Council to do exactly that.

Subject: FW: Code changes

From: "LI, UCCRAC" <RA-UCCRAC@pa.gov>

Date: 12/27/2011 10:18 AM

To: "Smith, Kelly K (LI-OCC)" <kellysmith@pa.gov>, "uccrac@comcast.net" <uccrac@comcast.net>

From: Daniel Sosso[SMTP:DANIELSOSSO@YAHOO.COM]
Sent: Tuesday, December 27, 2011 10:18:12 AM
To: LI, UCCRAC
Subject: Code changes
Auto forwarded by a Rule

To whom it may concern,

Please consider not adopting the new code changes. While we are not opposed to new changes we are in the most affected economic downturn in years. the last changes cost aprox. \$5000. per dwelling. While we have embraced the past changes . These changes are happening to frequently and much to fast for building inspectors and builders to grasp. As with all changes most of the changes involve interpation of the rules which causes a lot of differing opinions between builders and building officials. A lot of custom builders have gone out of business because of this economy and higher costs which in turn prevent buyers from buying because of higher costs. Not to mention that first time home buyers are being squeezed out because of rising costs. Please consider not adopting any new changes at this time that will add additional costs to the home. I have been in business for 33 years and employ about 100 people. They are struggling to make ends meet . Please give us some relief.

Sincerely

Dan Sosso

<<http://www.sossobuilders.com/>>

Dan Sosso, President

Daniel R. Sosso Builder, Inc.

724-935-6766 office

724-935-9339 fax

www.sossobuilders.com<<http://www.sossobuilders.com/>>

www.signaturehomesadvantage.com<<http://www.signaturehomesadvantage.com/>>

Dan Sosso, President
Signature Homes

724-935-4453 office

724-935-9339 fax

20421 Route 19, Suite 105, Cranberry Township, PA 16066

Referrals are our business, please don't keep us a secret!

P Think Green. Please don't print this message unless it's really necessary. Thank you.

Rcvd 12-27-11

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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:	12/28/11		
Proposer's Name	Shannon Cawley		
Company Affiliation (if any):	Kay Builders, Inc.		
Address:	5930 Hamilton Blvd., Allentown, PA 18106		
Telephone:	610-395-6857 x32		
Email:	ShannonC@KayBuilders.com		
ICC Code:	IRC		
ICC Code Change Number :	General		
Code Section(s):	All Codes Sections		
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.

2009-IRC has existed through the worst housing downturn in American history. It hasn't been fully absorbed by the building field in a seldom used three-year period. The changes proposed do nothing to help the building industry get back on its feet. It does just the opposite by increasing construction costs, overhead (learning, implementing, and managing code changes), and mandating a new volume of code books at this point in time just goes against all efforts to bring our industry back to a robust state.

We strongly suggest leaving the 2009-IRC in tact, and would change nothing at this point in time.

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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:	12-26-2011		
Proposer's Name	William Harrison, Jr.		
Company Affiliation (if any):	Harrison Construction, Inc.		
Address:	57 Harrison Heights Drive, Cogan Station, PA 17728		
Telephone:	(570) 998-2385		
Email:	harrisonconstruction@verizon.net		
ICC Code:	All 2012 codes		
ICC Code Change Number :	All 2012 code 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.

I been in the building industry and a Builder for over 30 years. These code changes every 3 years are overwhelming not only to us the builders & to our local inspectors but to our customers. I urge you to consider not adopting any new codes for 2012. These changes need to be reviewed and consider whether they are truly necessary. Any new changes right now or in the future will have a great impact on new home growth and the building industry in our State. Please consider no new Code Adoptions for 2012.

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Submission Method:	Public Hearing: E-Mail: <input checked="" type="checkbox"/>	Date Received: 12-29-11

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