



February 11, 2014

Board of Building Regulations and Standards
One Ashburton Place, Room 1301
Boston, MA 02108

Re: Opposition to Draft Stopping Code Change Proposal

Honorable Members of the Massachusetts
Board of Building Regulations and Standards:

A few months ago, I wrote to express our industry's concerns over how the codes and regulations change without substantive evidence as to why changes are warranted. This month, the BBRS is considering a change to the draft stopping requirements, and we are again expressing these same concerns.

Kevin Gallagher attempted to get the draft stopping requirement changed in the 2009 International Residential Code development cycle and again in the NFPA 5000. In both cases, these proposals were rejected by his peers, with the NFPA citing **"concerns with the reports presented in the substantiation."**

What has changed to now justify this proposal? Has Mr. Gallagher presented the board with any substantive evidence, aside from his personal experiences, that these changes are necessary?

We estimate that this code change proposal will increase the cost of the average home by about \$500. Additionally, this proposed change may trigger the requirement for new plans to be drafted, submitted and approved at an additional cost of approximately \$500 for each model, as well as time delays until the new plans are approved.

In an effort to alleviate some concerns with his proposal, Mr. Gallagher proposed an exception to the new requirement: "Exception: void spaces which are entirely filled with noncombustible insulation." Adding this exception further demonstrates our position.

Impractical and costly: The industry is unaware of a "blown-in" product that could be used to fill the cavities once on-site. Simply filling the cavities and verifying they were full would be nearly impossible without floor sheathing being held off for the length of the module. This means floor coverings, doors, moldings, and cabinets may be shipped loose for access, making the modular option impractical.

It would be possible to fill the ceiling with mineral fiber insulation in the factory, but shipping a unit with the floor cavity filled with insulation would not work due primarily weather issues. Again, floor sheathing may need held off and shipped loose for installation. With both of the above “options” the industry would have no idea what the local labor would be to finish the installation, but realistically it would be several thousands of dollars.

Compromises Safety: Cost and impracticality aside, our research indicates that this exception would reduce the fire rating in ceiling assemblies and compromise the safety of our homes.

The Gypsum Association (20th Edition) clearly states that adding insulation “has been shown to reduce the fire-resistance rating” of floor-ceiling assemblies. (Attached).

UL’s Fire Resistance Ratings Guide Info (Item #18) states “the addition of insulation in the concealed space between the ceiling membrane and the floor or roof structure may reduce the hourly rating of an assembly by causing premature disruption of the ceiling membrane and/or higher temperatures on structural components under fire exposure conditions.” (Attached).

Finally, an attached article from Structural Building Components Magazine highlights several passages describing what happens when insulation is added to a tested assembly. Interestingly enough, there are also few comments in this article supporting “deeper” floor/ceiling cavities for heat dissipation during a fire event. (Attached).

(Note - both GA and UL allow for an additional layer of gypsum to be added if insulation is added on the ceiling of the assembly. Materials and installation of this additional layer would add several thousand dollars on top of the above mentioned increases.

In short, the exception appears to be worse than that proposed change, as it is costly, impractical, and compromises safety. Mr. Gallagher’s amendment to save his unnecessary code change further demonstrates the need for the BBRS to be much more deliberate and require evidence-based research to support code changes in the future.

For these reasons, we ask that you reject this code change proposal in its entirety. Please feel free to contact me if you have any questions about this request or desire any additional information.

Sincerely,



Tom Hardiman,
Executive Director