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March 7, 2011

Mr. Brian Gale, Chairman  
Massachusetts Board of Building Regulations and Standards  
One Ashburton Place, Room 1301  
Boston, MA 02108  
Sent via e-mail to [blgalema@yahoo.com](mailto:blgalema@yahoo.com)

Dear Chairman Gale,

We are writing this letter in support of a communication sent to the BBRS Board earlier today by the Modular Building Systems Association (MBSA). The National Association of Home Builders (NAHB) and its Building Systems Councils (BSC) fully support the modular construction industry and the information supplied by MBSA. We agree that there is no need to further restrict the draftstopping and fireblocking requirements for the modular construction industry.

In a letter sent to the BBRS on April 12, 2010, the Home Builders Association of Massachusetts, the BSC and its Modular Council, and the NAHB Construction Codes & Standards Committee confirmed their support for the modular industry's position on this unnecessary code change proposal.

Interstitial spaces, referred to in the codes as concealed spaces, are present in all types of construction, including residential. These areas are most commonly found in the open areas in attics, drop ceilings, and floor assemblies where open-web trusses are employed. The horizontal and vertical concealed spaces between wall studs and floor/ceiling assemblies, where nominal lumber is used, is already separated by typical fireblocking methods. To help prevent the spread of fire in the large attics and open-web floor assemblies, the IRC and MA Code contains draftstopping requirements. The high level of engineering, inspection, and quality control that exists in modular construction allows the industry to maintain tremendous control over its fireblocking and draftstopping to assure the installation is in compliance with these code requirements.

It is not necessary to place additional and restrictive code requirements for fireblocking and draftstopping on the modular industry that exceeds the current code requirements. When a similar code change was proposed for the IRC, it was disapproved by the IRC Building Code Committee because, *"The committee feels the existing 1000 square feet threshold is adequate. The issues cited were code violations and there is no need to change the code."*

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Our stance on the draftstopping and fireblocking issue has not changed, and we support MBSA's efforts on this issue. We would like to echo MBSA's note that "this code proposal is one that has been deliberated by, voted upon and ultimately rejected by both the National Fire Protection Agency (NFPA) through letter ballot and the International Code Council (ICC) during the 2009-2010 ICC Code Development Hearing."

It is our hope that you will strongly consider these points and acknowledge the safe, code-compliant construction techniques that the modular industry brings to today's residential construction market.

Professionally,

Tony Watson  
Chair  
BSC Modular Council  
National Association of Home Builders

Harry Junk  
Chair  
Building Systems Councils  
National Association of Home Builders

James "Andy" Anderson  
Chair  
Construction Codes and Standards Committee  
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