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**Commonwealth of Massachusetts
Division of Occupational Licensure
Office of Public Safety and Inspections
Architectural Access Board
Subcommittee on Regulations**

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Subcommittee on Regulations Meeting Minutes – April 26, 2023
Teleconference

This meeting was open to the public and began approximately 10:00 AM.

Subcommittee member attendance:

Jeff Dougan, Chairperson (JD)
Ana Julian (AJ)
Paul Logan (PL)
Patricia Mendez (PM)
Elizabeth Myska (EM)
Deborah Ryan (DR)

Division of Professional Licensure Employees attendance:

William Joyce – AAB Executive Director (WJ)
James Plotkin – Legal Counsel (JP)
Jamie Dalton – Legal Counsel (JaD)
Bradley Souders – Office Support Specialist (BS)

JD opened the meeting for Roll Call:

PL, PM, EM, AJ,

1. 10:07 AM Minutes

CS Arrived

Motion to Accept February and March minutes by PL

2nd by AJ

By Roll Call CS/A, PL/Y, PM/Y, EM/Y, AJ/Y

2. 702.1 Fire Alarm Systems

- WJ: Complicated section, AAB and ADA reference NFPA. The primary difference is in terms of audible alarms, we have different decibel requirements where we adopted the feds requirement. We went with the federal requirement before because is easier to enforce in terms of sound measurements
- CS: I'd be interested in hearing EM's take on this one
- WJ: the difference here is how you measure how loud it is. They put a cap at 110 decibels, we say it must exceed the prevailing sound in the room by 15 decibels, but it can't exceed 120 decibels. Ours would be harder to enforce. Realistically NFPA controls this anyways because the fire marshal is the one doing the test. It makes sense to defer to NFPA. The outcomes won't be meaningful different but how we would measure it would be the issue.
- PL: How many times have there been a complaint for this?



- WJ: Never
- JD: I've never seen this come up as a topic in 23 years- the loudness of the requirement. We've adopted NFPA language in other sections of the code
- WJ: When it comes to audio alarms this is an area where the fire marshal cares a lot about. We should design the regs to mirror the one that the fire marshal with regulate heavily

Motion to Accept NFPA language by CS
2nd by PL

EM: I am not against, I am for this

3. 703 Signs

- WJ: Main differences between us and feds is character proportion and character height- we're measuring them differently (lists regs) we keep running into differences in signage height- they measure from the bottom we measure from the center, and theirs are based on reach ranges
- JD: in this portion I'm not sure there's a benefit to keeping our language
- WJ: I've never had anyone ask relief for character proportions which leads me to believe these are two different ways to reach the same conclusion
- JD: Who's language should we keep then
- AJ: Maybe we should go with the ADA standards because a lot of research went into coming up with those standard

Motion to Accept federal language for height and proportions by PL
2nd by AJ
By Acclamation/Carried

4. 703.5.1

WJ: this is another distinction without a difference, but the actual end result is the same

CS: I like the one that offers a suggestion, it is saying the same thing but the suggestion could help

Motion to Accept AAB language for finish and contrast of signs by CS
2nd by PL
By Acclamation/Carried

5. 10:30 AM 703.7.2.1 ISA symbol

- CS: Discussion about ISA symbol
- WJ: some states use the new one but the feds haven't changed and still use the ISA
- CS: It was a bone of contention before that everyone was using the new one
- JD: The international symbol is people want to use a different symbol they shouldn't petition us they should petition the body that chose the ISA
- PL: I would recommend either one, if we were going to update these regs every 5 years that's one thing, but is this going to change at some point to the newer ISA as opposed to the current one
- WJ: this is a can of worms we do not want to be involved in. the feds don't let you use the updated one, their guidance on the subject raises good questions in there is value in having a standardized symbol for everyone everywhere. There is a value in simplicity. The new ISA is controversial in the community. We should take the feds stance and when they change we can to

6. 10:35 AM 703.7.2.4

- WJ: the assisted listening image is the one difference. Feds use a dark background, ours is a light background. We should default to the feds for ease of use, so people don't have to manufacture a sign specifically for Massachusetts.
- PL: I agree with WJ, the federal image is standard, and looking at it it looks more distinguished than ours
- WJ: I'm thinking the feds switched to this dark background since the 90s
- JD: Is the ADA symbol the actual symbol for ISO image?
- WJ: they both probably comply, the colors are just inverse

Motion to Adopt ADA image for assisted listening systems by PL

2nd by CS

By Acclamation/Carried

7. 10:40 AM 704.7 Public telephones

- WJ: Difference is in gain level; the feds say 12-20 and we say 12-18
- JD: Ours says all telephones, feds say telephones equipped with volume control
- WJ: that will get covered in the scoping section
- JD: its probably appropriate to match the feds requirements

Motion to Accept federal standard and to include section B (instructions) by CS

2nd by PL

By Acclamation/Carried

8. 705 Detectable warnings dome size

- WJ: difference of 4 mm here, small difference overall
- AJ: Is this the same as prowag
- WJ: we might have already dealt with this
- JD: We did this in August 2022

9. 706.7 Placement of listening systems

- WJ: this may also be scoping
- JD: was this due to old technology?
- WJ: I'm assuming this was so they all weren't stuck in an unappealing location or transition concerns
- PL: I see lots of numbers, recommendation WJ?

Motion to keep AAB language as 706.7 and 706.8 by CS

2nd by PL

By Acclamation/Carried

Motion to Adjourn by PL

2nd by CS

By Acclamation/Carried