24 January, 2007

ICC Evaluation Service Inc.
5360 Workman Mill Road
Whittier, California 90601
USA

Attention: Brian Gerber, SE

Reference: Proposed Revisions to the Acceptance Criteria for Fixed-Height, Low-Profile, Raised Floor Systems

Subject: Comments of Haworth on the Proposed Revisions and Rationale

Dear Mr. Gerber:

Haworth appreciates the opportunity to comment on the Proposed Revisions to the Acceptance Criteria.

To acknowledge our interest, Haworth manufactures no products evaluated against the criteria in question. Haworth has previously participated in the development of two other Acceptance Criteria concerning raised access floors: AC175, Acceptance Criteria for Raised Floors over Concealed Spaces, and AC300, Acceptance Criteria for Access Floors. While these criteria relate to different products, there are similarities amongst the scopes of each criterion to merit comparison. Haworth believes changes to any of these criteria must consider these differences.

In light of this, Haworth supports most of the proposed changes. Our comments are confined to those changes for which we have identified concerns.

Proposal to increase allowable height to 2-3/4 inches (70 mm)
(Ref. Section 1.2, l. 11)

The primary distinction between criteria AC151 and AC175 is the difference in height; AC175 permits heights up to 4 inches, while AC151 is limited to 2-1/2 inches. Recognizing that increasing the height of the system may increase the hazard due to fire beneath the floor, AC175 imposes additional test requirements, including a test intended to simulate a fire beneath the floor. Haworth is unaware that any research has been undertaken to determine the critical height at which the additional test requirement is of benefit in predicting or preventing a hazardous situation.
from occurring. If in fact this research has not been performed, it would seem that the proposed increase in height may inadvertently permit a hazardous situation to be created.

Since AC175 already exists, and allows for floors up to 4 inches in height, Haworth sees no commercial impediment would be created by retaining the existing height limit in AC151 at 2-1/2 inches, and having taller products evaluated against the requirements of AC175.

**Application of CISCA Test Procedures to Fixed-Height Floors**
(Ref. Section 3.2.2 Test Procedures, ll. 136 - 143)

The CISCA Procedures referenced by the criteria are written explicitly with respect to adjustable-height access floors. Since the subject-matter of AC151 are typically fixed-height floors, the CISCA criteria as written do not apply to such floors. CISCA is presently developing revisions to these test methods intended to apply to fixed-height floors; however, until these are balloted and published they cannot be referenced by the proposed Criteria. Haworth suggests additional clarifying language be added to the proposed criteria which would ensure consistent testing of such floors; alternately, the publication of the new CISCA methods, expected to occur in the spring of 2007, should be awaited and adopted.

In addition, there is presently no uniform load test method in the CISCA criteria. Haworth finds the proposed changes to the language of AC151 are somewhat unclear. A better approach would be to follow the precedent of AC300 (Section 4.1.2), in which ASTM E2322 has been adopted, being a procedure explicitly written for the testing of floors.

Finally, the criteria is missing explicit acknowledgement of the code requirement for concentrated load testing over an area 2-1/2 feet square. There may be some products for which such a load application area would result in distinct effects not identified by uniform load testing, due to unusual panel sizes or areas. Again AC300 (Section 4.1.1) may be referenced for language suitable for establishing this requirement.

**Quality Control Requirements for Pedestals and Other Components**
(Ref. Section 4.2, ll. 156 - 161)

The proposed criteria does not require the same level of process inspection for the support structure as for the panels. Haworth is concerned that this is a serious oversight. The structural integrity of such a system, and the performance of these products in the event of fire, are directly related to the material characteristics of the understructure. It would seem illogical to require less oversight
of the manufacture of these elements than of the panels themselves. We urge the Committee to reconsider this requirement.

We trust our submission has been of value, and look forward to ongoing participation in the consideration of this matter. Questions related to our suggestions may be directed to the undersigned.

Sincerely,

Haworth

[Signature]

Jim Thompson Goodchild, P. Eng.
Manager, Product Performance