



January 23, 2008

Mr. Russ Krivchuk
ICC-ES
5360 Workman Mill Road
Whittier, CA 90601

Re: Acceptance Criteria for Structural Adhesives Used for Bonding Cold-formed
Galvanized Steel Shear Wall Assemblies, Subject AC393-0208-R1

Dear Russ:

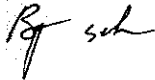
I have some comments on the proposed AC393 as follows:

1. General: It seems that this type of test methods is better published by a national consensus standard developer, such as ASTM. While the AC process is an open process, only limited adhesive experts are aware of the existence of AC's. It is understood that the proponent prefers an immediate code acceptance through the AC. However, it would still seem advisable to defer this type of standard development to ASTM, which has a much broader group of experts in this field.
2. Section 3.1: It states that samples are to be cured per manufacturers' recommendations. Which manufacturers? Adhesive manufacturer or the shearwall panel manufacturer, or both?
3. Section 4.1: Under the heading of "definition," this is not a "Standard Test Method." Other parts of this section are poorly written based on the format of AC's. Is there any basis for the "Condition of Acceptance" in light of the adhesive science or code minimum?
4. Sections 4.2 through 4.8: Is there any basis for the "Condition of Acceptance" in light of the adhesive science or code minimum?
5. Section 5: Without a product standard, I wonder what the minimum quality control requirements will be. The adhesive could be the only thing that hold the assembly and the building together. Without a proper quality assurance, this could be a big concern for the public safety.
6. Section 6.1: The adhesive qualification specified in this draft AC does not address the heat durability and should not be used in fire-rated wall assemblies. In addition, since the assembly is involved with adhesive joints, it should be excluded from high

seismic design categories unless specifically evaluated. The seismic coefficients and factors should be addressed in accordance with the code.

7. Section 6.1.5: AC154 tests have not been required in the body of the AC. The adequacy of AC154 is questionable based on the latest knowledge on cyclic shear test methods.

Sincerely,



Borjen ("B.J.") Yeh, Ph.D., P.E.
Director
Technical Services Division
E-mail: borjen.yeh@apawood.org