

May 14, 2008

ICC Evaluation Services  
5360 Workman Mill Road  
Whittier, CA 90601

Attn: Michael Beaton, P.E.

Re: Proposed Revisions to the Acceptance Criteria for Quality Documentation, Subject  
AC10-0508-R1 (MB/MJ)

Based on our review of the proposed revisions to AC10 dated April 28, 2008 we request changes and clarification as follows:

In regards to the addition of Section 1.4.7 in regards to Moving manufacturing locations:

Add the following new definition:

**1.3.11 Significant Change:** A significant change is one that may reduce the performance of the product as it pertains to applicable test standards or acceptance criteria

Revise existing and proposed sections as follows:

~~3.1.4 ICC-ES will be notified in writing if there is a significant change in the product, manufacturing procedures or quality system documentation from what was recognized upon issuance of the evaluation report. A significant change is one that may reduce the performance of the product as it pertains to applicable test standards or acceptance criteria.~~

~~1.4.7.1 Move of Equipment Without Significant Changes:~~ When the move of manufacturing involves only a move of equipment and does not result in a significant change of methods, or ~~manpower~~ key personnel, or the product specifications, a statement shall be submitted to ICC-ES attesting to same. If the product is recognized under a third-party quality control program, the inspection agency shall confirm the statement

~~1.4.7.2 Changes in Manufacturing Equipment, Methods or Personnel, or in Product Specifications With Significant Changes:~~ When the move of manufacturing results in a significant change of equipment, a change in the methods used to produce the product or system, a change in ownership or principal quality management, or a significant change in product specifications, the following shall be submitted to ICC-ES:

1. Revised quality documentation as applicable
2. Report of qualifying inspection at the new location
3. Data demonstrating that the product manufactured at the new location is equivalent to the product recognized by ICC-ES at the former location. Some ICC-ES acceptance criteria also have requirements for testing at new manufacturing locations.

**In regards to the addition of Section 2.8 In-House Testing Laboratories**

Revise Appendix B as follows:

Add the following to the matrix to reflect the new section:

2.8.1 (Corrective Actions)		
2.8.2 (Technician Qualifications)		
2.8.3 (Handling Procedures)		
2.8.4 (Reference Materials)		

In addition we propose the following changes to Appendix B to address confusion as to who should sign the cross reference, when and why. As this is reviewed and approved with the qualification audit we see no reason why this needs to be signed specifically.

**Current:**

Date of Documentation: \_\_\_\_\_

Evaluation Report or File No. \_\_\_\_\_

Company Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Name of Signer (type or print) : \_\_\_\_\_

Date: \_\_\_\_\_

**Proposed:**

Company Name: \_\_\_\_\_

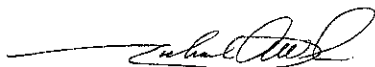
Product/Material: \_\_\_\_\_

Evaluation Report or File No. \_\_\_\_\_

Completed by: \_\_\_\_\_ Date: \_\_\_\_\_

Sincerely,

**HAWORTH**



Michael Weber, CFM, IIDA  
Manager, Architectural Compliance/Product Performance

cc: JU/files

**SMITH-EMERY LABORATORIES***An Independent Commercial Testing Laboratory, Established 1904*2475 Lancaster Drive NE, Building B, Suite 1 3  
Salem, Oregon 97303Phone 503-371-6911  
Fax 503-371-6918

04-30-08

ICC-ES

Regional Office

5360 Workman Mill Road

Wittier, CA 90061 USA

Attention: Mr. Mike Beaton, P.E.

Subject: AC-10 and AC-304 General Comments

Dear: Mike

1. **AC-10, Section 1.4.6 Qualifying Inspections:** ICC-ES and SEL have discussed this item in the past few months. While I don't disagree with this revision, I wonder why this is being added at a time when ICC – ES is under the gun to provide a more timely report. Isn't this going to add more stress to your troops when they are already spread thin?
2. **AC-10 Section 1.4.7.1 Moving of equipment:** It has been my interpretation from Emails from the ICC-ES staff (Birm., LA and Chicago) That when a report holding Roll Forming facility moves their units, a qualifying audit must be completed to assure the continued compliance of the machines. This was interpreted by your staff to include even a move within the facility itself, such as a Mexico plant that moved their roll formers approximately 50 to 100 feet. Is this revision just clarifying the ICC-ES current position or eliminating the requirement?
3. **1.4.7.2 Changes in Manufacturing Equipment, Methods, or Personnel, or in Product specifications:** This revision notes Ownership changes. Will ICC-ES be amending their policies to incorporate changes in ownerships that will affect reports? In the past reports were not transferable. Please clarify this revision.
4. **AC-304:** We here in the SEL Salem Office, feel this criteria revision has been very well written, and have no comments to this criteria.

Should you have any questions concerning this letter, please give me a call.

Respectfully,

*William J Tate Jr.*

William J. Tate Jr.

N.W. Regional Technical Director

Smith-Emery Laboratories

Salem, OR branch office

IATCA-QSM-AS-10704-440