

October 7, 2008

To Whom It May Concern:

RE: Comment to proposed AC70 revision – October 2008

The current and proposed text within section 6.6 of AC70 does not fully address what is covered in Chapter 13 of the ASCE/SEI 7-05 standard. The proposed acceptance criteria text directs the reader to one specific section of the ASCE 7 standard which may promote negative connotations toward the use of Power Actuated Fasteners (PAF's). If there is a need to change the exception within the acceptance criteria, caution should be used in the development of the wording used for that exception.

While there is no denying the restriction in ASCE/SEI 7-05 for the use of powder actuated fasteners in tension load applications (13.4.5), the ASCE standard somewhat contradicts itself within section 13.5.6 in discussing suspended ceilings. This section essentially allows the use of a PAF to be used in tension in a seismic area. By following the flow of documents through this section, it leads to the recommendations of Cisca seismic zones 3 & 4, where PAF's can be used to hold the gravity load of a suspended ceiling, lighting and mechanical services. While carrying gravity loads and seismic loads are two different things, many readers may not distinguish the difference and restrict the use of PAF's for suspended ceilings entirely because of the tension loading restriction.

Section 1613.1 of the IBC leads the reader to the ASCE 7 standard in its entirety with the exception of chapter 14 and appendix 11a. The use of PAF's in ASCE 7-05 could be considered to be covered in chapter 13. Perhaps the exception written into AC70 should be worded to direct the reader to Chapter 13, Seismic Design Requirements for Non-Structural Components in its entirety. This chapter is full of sections and subsections where PAF's may be used along with their limitations. Should a report holder want to test to overcome a specific restriction, an approved test criteria should be developed to accomplish this.

Respectfully submitted



Dave Jablonski
Product Validation Manager