

Comments on Criteria AC386.

Keith A. Poerschke
National Gypsum Company
704-551-5807
kapoerschke@nationalgypsum.com

Comments:

I recommend that this change not be made. It appears that this criteria is pulling requirements from several different standards or other acceptance criteria. I think that ES needs to be careful in determining what this product is required to meet, since in essence the fiber reinforced magnesium oxide substrate industry is writing a standard for their product in an ES Acceptance Criteria. If their industry would have taken the time to establish an ASTM standard for their product, like the other substrate manufacturers have, they would not have this issue, it would be defined in the standard for the product. This product is not currently defined anywhere else. In our opinion, the requirements for this product, since it is being offered as an alternative to something currently listed in the code without being listed itself, should at the minimum meet what is currently approved by the code. The code approves products complying with ASTM C 1288 or C 1325 as backer boards for walls and flooring. Of those two standards, C 1288 would appear to be the most applicable, as it covers discrete fiber cement substrate sheets, as opposed to C 1325, which covers Fiber Mat reinforced backer units. Either way, the product should be able to comply with the standards that the code allows, and changing the Surface Burning Characteristic requirements is inappropriate. It seems that this product group has been allowed to pick and choose which of the requirements it wishes to meet from either of the standards. I am not aware of any attempt on these manufacturers parts to obtain an ASTM standard governing their products, and I urge the ES staff to be very careful (as they always are) in making allowances for products that are using the Acceptance Criteria to bypass a full consensus process from a recognized Standard Development Organization. We are NOT in concurrence that this criteria should be changed. I don't think this was any oversight on anyone's part, and I believe that the 10 FSI and 5 SD numbers should be more than reasonable.

Comments on Criteria AC386.

Michael Gardner
Gypsum Association
3012778743
mgardner@gypsum.org

Comments:

On the basis of the information provided, The Gypsum Association would urge ICC-ES staff not to modify AC386 as requested. We would note the following: ? It is not appropriate to make the criteria in AC386 more liberal than the criteria in the source documents from which AC386 is derived. Increasing the FS/SD limits in AC386 would make the FS/SD criteria more liberal than the same limits contained in AC376 and ASTM C1325. ? The proponent's comment that the FS 10/ SD 5 limits contained in the AC ?are in fact the results from one of the supporting clients E 84 test? would seem to indicate that the limits are reasonable and that they can be readily complied with. ? It would appear that the request to modify AC386 is being driven by a building product that is unable to (or building products that cannot) comply with the FS/SD limits contained in AC386; however, it is unclear what the actual FS/SD characteristics of the product in question are. If the FS/SD characteristics of the product in question are substantially different than the established limits required by AC386, it would seem to indicate that the composition of the outlier building product(s) may be substantially different than that used to establish the 10/5 limit and would indicate that the use of AC386 for the outlier product(s) may not be appropriate. ? The existence of a product that apparently cannot comply with the FS/ SD criteria in AC386 is not, in our opinion, substantial justification for changing the established limits. Reflecting the criteria contained in the source documents represents the only means by which the products manufactured to AC386 can be evaluated, since no consensus product standard exists. Modifying the parameters of AC386 beyond those contained in the source documents can, and should, be addressed through the creation of a consensus product standard. The criteria in AC386 should not be selectively modified as requested by the proponent.

Comments on Criteria AC386.

Jos? Manuel Estrada
USG Corporation
312.436.4260
jmestrada@usg.com

Comments:

After our review of the AC386 posted for public comment, it has become apparent that the proponent is seeking a very broad range for surface burning characteristics. We understand that the criteria has been developed drawing from pre-established criteria (i.e., AC376), however, the process appears to be selective in its choice of criteria. The current proposal to modify AC386 indicates a very broad range of surface burning characteristics while AC376 contains a more stringent surface burning criterion. This selective modification of the criteria creates an unfair competitive advantage versus products that are compliant with the more stringent criterion and may compromise life-safety design considerations. If the performance of the products under AC386 is similar and drawn from AC376 and AC378, it is practical to have a similar range for the Surface Burning Characteristics. Thus, the present specifications for the Surface Burning Characteristics in AC 386 (flame-spread index - 10 or less; and, smoke-developed index - 5 or less) must be maintained.

Comments on Criteria AC386.

Michael Jones
QAI
(909) 483-0250
mjones@qai.org

Comments:

We concur with the revisions to ensure that the products meet the minimums required of the codes.