



May 18, 2009

Kurt Stochlia, P E
ICC-ES
5360 Workman Mill Road
Whittier, CA 90601

Re: Acceptance Criteria for Structural Wood-Based Products; Subject AC47-0609-
(KS/JS)

Dear Kurt:

As you are fully aware, ASTM D07.02.03 Structural Composite Lumber committee has an active task group that is developing an ASTM standard for the laminated veneer bamboo (LVB). While I understand in most instances, the ES has to act in response to the client's request for product evaluation and cannot wait until a national consensus standard is published, it would still seem to be desirable to coordinate this AC revision with the ASTM group.

Having said that, I would suggest the adhesive heat durability requirements that were recently approved by the ASTM committee for LVL and PSL be added to the list of requirements in Section 3.7.1 of the proposed AC. In addition, I assume this LVB product will be limited to dry conditions of use because it is a relatively new product to us in North America and we probably have very limited information on the relationship between the moisture and strength/stiffness. As a result, I am not sure if all property adjustment factors for engineered wood products, as provided in the NDS, would be applicable to the LVB product. The same is true for the fire performance and heat resistance of this product.

Overall, I urge some cautions when approving this product in accordance with this AC.
Thanks for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Borjen Yeh".

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

REPRESENTING THE ENGINEERED WOOD INDUSTRY



May 18, 2009

Kurt Stochlia, P.E.
Vice-President, External Operations
ICC Evaluation Service
5360 Workman Mill Road
Whittier, CA 90601

**RE: Proposed Revisions to Acceptance Criteria for Structural Wood-Based Products,
Subject AC 47-0609**

Dear Mr. Stochlia:

Thank you for the opportunity to comment on the proposed revisions to AC 47. Our staff has reviewed the criteria and we have some concerns relative to the proposed methodology:

- To be consistent with updates taking place in other acceptance criteria, it seems like an opportune time to update AC47 to reference the 2009 IBC and 2009 IRC which references ASTM D 5456-05a.
- Since ASTM D5456 contains no limits for thickness swell and the performance of the LVB product is unknown, it would seem prudent to replicate the requirements of Section 3.4.3.2 for SPSL within section 3.7.1 for LVB.
- We have also noted that neither ASTM D5456-05a, nor the AC47 proposal contain requirements for adhesive heat durability, which have recently been added to 5456-09.

To simplify the AC and highlight only those requirements that will be different for the LVB product, it is suggested that Sections: 1.3.1, 1.3.2, and 3.7.1 be replaced with the following:

1.3.1 2009 International Building Code (IBC), International Code Council.

1.3.2 2009 International Residential Code (IRC), International Code Council.

3.7.1 LVB shall comply with the requirements for OSL in ASTM D5456-05a. In addition, the following shall apply:

3.7.1.1 Dimensional Stability testing shall be in accordance with Section 5.3.2.1-a of PS-2.

3.7.1.2 The material shall be tested in accordance with and meet the thickness swell requirements noted in Section 4.2 of AC124.

3.7.1.3 The adhesives shall meet the heat durability requirements in Section 4.1.2 of AC 14.

3.7.1.4 Tests shall be conducted to verify that the specified spacing of nails of various diameters is adequate to prevent splitting. Details of the testing shall be discussed with ICC-ES staff prior to the tests' being conducted.

Thank you for consideration of these comments. If you have any questions regarding these comments please don't hesitate to contact me at 208-429-3715 or at Daniel.Cheney2@Weyerhaeuser.com

Sincerely,

Daniel W. Cheney (sent via e-mail)

Daniel W. Cheney, P.E.
Director of Codes and Product Acceptance