

Rosalind Fazel

From: Jason Smart
Sent: Monday, January 04, 2010 5:04 PM
To: Rosalind Fazel
Subject: FW: AC391 Comments for December Alternative Criteria Posting
Attachments: Smart_AC_391_Response_100104.pdf

Hi Rosalind: Here are some public comments on the Dec Alt. Agenda Posting of AC391.

Jason

From: Edward Chin [mailto:ed@holdown.com]
Sent: Monday, January 04, 2010 3:54 PM
To: Jason Smart; Brian Gerber
Cc: sales@tiemax.com; go-bolt@cfl.rr.com; Joe Hale
Subject: AC391 Comments for December Alternative Criteria Posting

Jason and Brian:

Please find attached our AC391 Task Group response to Simpson's submittal for the December 2009 Alternative Criteria. We have proposed a couple of new paragraphs 6.4.6 and 6.4.7 to the adopted version of AC391 (June 2009) which would alleviate the need for this complete rewrite by Simpson.

Since the Simpson document appears to be reposted again for the February 2010 Agenda, our document attached here may be submitted again for the January 19, 2010 deadline.

Our response here picks up some items from Jason's letter to the committee for the Feb Hearings.

Thank you for your consideration of our comments. I will submit this PDF also thru the web site.

If you have any Q's please call or email!

Ed Chin

Edward Chin, PE

Vice President
Earthbound Corporation
17361 Tye Street SE
Monroe, WA 98272
360-863-0722 phone
360-863-0724 fax
<http://www.holdown.com>

Rosalind Fazel

From: ed@holdown.com
Sent: Monday, January 04, 2010 3:57 PM
To: Rosalind Fazel
Subject: AC391 Comments
Attachments: Smart_AC_391_Response_100104.pdf

Comments on Criteria AC391.

Edward Chin
Earthbound, TieMax, Hurribolt and GoBolt
3608630722
ed@holdown.com

Comments:

Please find attached our AC391 Task Group response to Simpson's
submittal for the December 2009 Alternative Criteria. We have proposed a
couple of new paragraphs 6.4.6 and 6.4.7 to the adopted version of AC391
(June 2009) which would alleviate the need for this complete rewrite by
Simpson. Thank you, Ed Chin AC391 Task Group Chair

Attachments:

- Smart_AC_391_Response_100104.pdf



January 4, 2009

Jason V. Smart
Senior Evaluation Specialist
ICC Evaluation Service, Inc.
Birmingham Regional Office
900 Montclair Rd, Suite A
Birmingham, AL 35226

SUBJECT: AC391 December Alternative Criteria:
Task Force Comments to Simpson Strongtie Proposal
Dated November 6, 2009

Dear. Mr. Smart:

This letter addresses the proposed complete rewrite of AC391 proposed by Simpson Strongtie that was posted under the December 2009 Alternative Criteria. The following comments are not in a particular order of importance

Our task group is essentially NOT in favor of changing or expanding (or limiting?) AC391 to limit to wind uplift only, allowing rod spacing to be stipulated and include flexural analysis of top plate bending as all these items should remain out of scope of AC391 and left to the design professional.

There are too many items here that cater to Simpson's specific needs such as the use of additional clips and hardware that they happen to manufacture. The use of such additional hardware should not be left to this AC and be also left to the design professional.

There are elements proposed here by Simpson would certainly affect AC13 – Joist Hangers and Similar Devices

We propose the following Paragraphs be added to the June 2009 currently adopted version of AC391 which would alleviate Simpson's concerns:

6.4.6 Connecting Wood Members: Connected wood members must be analyzed for load carrying capacity at the connection in accordance to the NDS.

<Note this is a statement is already shown in Simpson's ESR-2613 at the end of Section 4.0>

6.4.7 Wind Uplift Rod Assembly Spacing: For wind uplift systems, the Design Professional shall consider top plate bending and splicing when determining the spacing between assemblies.



The following are additional detailed arguments with no specific order of importance:

1. **Traditional Revision Proposals to Existing ACs:** This response by Simpson doesn't follow the tradition for submissions to modify existing ACs. It is difficult to see what revisions / deletions are compared to adopted version. The title of this submittal as an AC391 revision is misleading, when in fact is an entirely new proposal.
2. **Old and Recycled Topics Already Considered by Committee:** The Simpson letter and revision all pertain to topics brought forth for consideration by the ICC Committee last June for AC391. AC391 was subsequently adopted as is during that same meeting. Why are these issues still being brought up? Allowing this revision to go forward in this method would set an unwise precedent, effectively giving veto power to an opponent of an AC. Concessions were made to address the concerns of Simpson in the duly ratified AC391 at that time. It was agreed by the task force and by the voting majority of the Committee that these same issues were adequately addressed by the current AC 391, specifically leaving the design professional with the responsibility of integrating the covered product and top plate analysis into their building design.

During the early part of the ratifying process, the position of Simpson Strongtie was that this AC was not even needed since a design professional could design all the elements covered in this AC using the existing code. The task force has always stated that the purpose for this AC was to bring an "apples to apples" comparability to the vendors that make up this task force and to ensure a quality assurance program of materials supplied is in place to allow code officials, designers, and end users of the offered products know that we all followed the same methodology when arriving at the load capacity of our components. The ratifying vote has confirmed the industry need for this AC as originally adopted. During this economic downturn, 'mega companies' such as the proponent of this submittal may seek to outlast the smaller operations by causing the smaller companies to waste resources readdressing settled issues.

3. **The Current AC391 will not allow applicants to show threaded rod spacing for wind restraint or similar:** Contrary to Simpson's opinion, the current adopted AC391 will NOT allow a conversion of an existing legacy wind system report holder to stipulate rod run (CRTR) spacing in wall as that is out of scope of the document. The ESR of an AC 391 report holder would defer spacing to engineered shop drawings which needed to be ultimately approved by Design Professional and/or local jurisdiction. (See proposed Para 6.4.7 above) All of the wind system legacy proponents represented by this letter all agree that CRTR spacing should not be a part of the final report holder information.



4. **AC391 Should NOT Be Limited to Wind Only:** AC391 as is effectively determines assemblies for BOTH wind and overturning. A threaded rod, bearing plate and maybe a shrinkage fastener will have the same resistive capacities no matter if the uplift is generated from wind or with overturning. Simpson doesn't give a valid reason to separate other than spacing issues which is out of scope of AC391. Please note that Simpson holds reports on connectors used for both wind and overturning restraint all referencing AC155 or AC13. The connectors are rated for load resistance, no matter where the load comes from.

5. **Introduction of Additional Connectors into the AC:** All the proposed topics pertaining to spacing and the inclusion of additional truss/holdown connectors (which Simpson also happens to sell) is already out of scope of AC391 and should NOT be brought into a revised version of AC391. Again the use of additional hardware should be left up to the design professional and not necessarily the opinion of a mega company trying to sell more products. The recommended inclusion of additional hardware for CRTS should be coordinated between the rod system vendor, design professional of the building and perhaps local authority having jurisdiction and not dictated by an AC.

6. **Stipulating Spacing Requirements is by Prescriptive Design or by Design Professional:** Structures requiring some type of hold system for either wind or overturning force will be designed by a design professional that can determine better the requirements for the spacing of the rod assemblies. Due to ever changing design requirements and the introduction of new materials which bring with it many design combinations that are too numerous to be included in a single spacing chart. For example, a structure could have both the combination of light gauge steel and wood, or perhaps with (or without) structural sheathing. Just as the anchors used in these assemblies will require a design professional to establish the load requirements for the assemblies and choose an approved anchor solution meeting those conditions.

Prescriptive Designs: Where prescriptive designs (WFCM or ICC-600) are used the building structure size and materials are limited by the code. The report holder has the option to defer a general spacing chart based on these limited conditions just as Simpson and other companies have done. This has been done in the past and has typically been a more conservative design.

7. **Top Plate Bending:** Top plate bending is already a consideration per code as cited by Simpson, why are we recreating the wheel by testing and verifying adopted code requirements?



Conclusion: AC391 does not merit to be changed to wind uplift only. Simpson doesn't even provide an explanation as to why eliminate overturning components. The revision presented here that involves testing of a wall to justify final spacing and adding additional hardware that Simpson happens to sell is unnecessary and shall be left up to the report holder's engineered shop drawings. For this AC to mandate the spacing is out of scope and not necessary. This total rewrite from Simpson should be abandoned since it was already presented in front of industry and the Committee last June and voted against implementing. Do we need to spend the Committee (and the rest of the Industry) valuable time and energy to beat a dead horse further? There are items presented here that should apply to AC 13 if adopted.

We believe the current intent of AC391 is more than adequate for both wind and overturning restraint and does not need to include any portion of this rewrite to incorporating wall testing for spacing stipulation. Simpson believes that wind legacy report holders will abuse the system by publishing a spacing table in a report conversion, but in actuality is out of scope of AC391. With established prescriptive methods adopted by code available, and the fact that the design professional needs to be involved to determine spacing, there is no need to establish testing criteria here in this AC.

Thank you for the opportunity to submit comments. Please call or email if you have any questions.



Edward Chin

Edward Chin, PE
Vice President
Earthbound Corporation



Ward Gould

Ward Gould
President
Go-Bolt, Inc



Joe Hale

Joe Hale
Senior Engineer
Hurri-Bolt, Inc.



Bill Wade

Bill Wade
Director of Sales and Marketing
TIE MAX

Rosalind Fazel

From: Brian Gerber
Sent: Monday, January 04, 2010 5:19 PM
To: Rosalind Fazel
Cc: 'Ward Gould'; Jason Smart
Subject: FW: Acceptance Criteria Public Comment
Attachments: 12-24-09 Public Comment AC391.doc

Rosalind,

This came through for AC391 December, if you have not received it already.

Brian Gerber
ICC-ES

-----Original Message-----

From: go-bolt@cfl.rr.com [mailto:go-bolt@cfl.rr.com]
Sent: Monday, January 04, 2010 3:15 AM
To: Kurt Stochlia
Cc: Brian Gerber
Subject: Acceptance Criteria Public Comment

Gentlemen,

Please find the attached file and process it as Public Comment for Proposed Revisions to AC391.

Sincerely,
Ward Gould
Go-Bolt, Inc.
75 Rolling Hills Lane
Murphy, NC 28906
Ph: 888-734-4046
Fx: 386-738-1037
Email: go-bolt@cfl.rr.com

December 24, 2009

Kurt Stochlia
Technical Director
Brian Gerber
Principle Structural Engineer
ICC Evaluation Service, Inc.
Los Angeles Business/Regional Office
5360 Workman Mill road
Whittier. CA 90601

Subject: Comments to Simpson Strong Tie Proposal Dated November 6th, 2009

Gentlemen,

After review of the Proposed Revisions to ICC-ES AC391 presented by Jeff Ellis, P.E., S.E., I have made the following conclusions, now presented for your consideration:

1. The submittal by Mr. Ellis is presented in a non-typical format, thereby not providing the expected standard of comparison for revision review. It does not follow the standard rule for submissions to modify an existing AC, and thereby encourages suspicion of the intent of the submittal. The submittal is not a mark-up (strikethrough/underline) version of the AC which would provide the viewer the opportunity to compare proposed revisions directly to particular sections of the AC. The submittal does not even provide Section references to AC391 for comparison.
2. The submittal by Mr. Ellis is presented (and titled) as a “Proposed Acceptance Criteria”, not a “Proposed Revision”. It encompasses subject matter that has been defined as being out of the scope of AC391. Where the document might have weight as a submittal for an entirely new AC, it should not be considered as a proposed revision for AC391.
3. Mr. Ellis states in his Introductory Letter that AC391 is currently entitled “Acceptance Criteria for Continuous Rod Tie-Down Assemblies”, but in his opinion the “assemblies” are just “components”. This reasoning fuels further possibilities – are not all assemblies simply components of the engineers design – is not the engineers designed assembly not a component of the community. His attempt to redefine the subject matter further supports my determination that the intent of his proposal is not to revise the current AC but to replace it with a new AC having content and scope beyond and outside that of AC391.
4. Mr. Ellis states a concern about the production of spacing tables with the use of AC391, when AC391 currently will NOT allow the stipulation of spacing – it is out of the scope. Spacing is a determination to be made by consensus of shop drawings, the design professional of record and/or the local jurisdiction. All of the rod system companies represented as authors of AC391 agree that spacing should not be a part of the final report.
5. Mr. Ellis expresses a concern that eccentricities of the framed structure may be neglected. His concern would be better directed to the design disciplines of the

industry as the current AC and/or code does address this subject matter in a definite manner.

6. Mr. Ellis and other Simpson representatives have continuously, and again now, expressed the determination that roof wind uplift and overturning are so different in nature that they can not be properly restrained by like hardware. I have yet to find any substantiating data presented by those making this claim. This subject has been hashed over many times in the last several years and continues to have no weight.

It is my determination that the submittal, new criteria poorly disguised as a proposed revision, should be refused by ICC-ES as a proposed revision and either moved to a proposed new criteria or an Appeal of Committee Technical Decision. The current proposed revision submittal is not presented in proper format; it addresses only subject matter being outside the scope of AC391 and also is based on arguments that all have been previously fully vetted by the ICC-ES Criteria Development process. I also find the Simpson proposal to be unfortunate display of questionable businesses practices, effectively rehashing previously vetted subject matter and clogging ICC operations with childish squabbling. Mr. Barclay Simpson has been quoted as stating that most of the Simpson patents are for “scare value” only – is this now the business model to be used in Acceptance Criteria development?

Sincerely,
Ward Gould
Go-Bolt, Inc.
75 Rolling Hills Lane
Murphy, NC 28906