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**To:** ICC-ES Evaluation Committee  
**From:** Bart Berneche  
**Date:** January 28, 2010  
**Subject:** Proposed Acceptance Criteria for Vertically Acting, Egress Fire-door Assemblies, Subject AC421-2010-R1 (BB/MO)

**MEMO**

Public comments have been received regarding the subject criteria, which was considered in December 2009 under the Alternative Criteria Process. The comments were received from Southeastern Dock & Door Inc. (Jim Foster, dated December 22, 2009), and from Koffel Associates, Inc. (William Koffel, P.E., dated January 4, 2010). A draft of the proposed criteria, and copies of the comments received, can be found here on the ICC-ES website:

[http://www.icc-es.org/Criteria\\_Development/alt\\_past.shtml](http://www.icc-es.org/Criteria_Development/alt_past.shtml)

The public comments provided make reference to Agenda Item E54-09/10, which was discussed at the most recent ICC Code Development Hearings in Baltimore, in October and November of 2009, resulting in the following action taken by the committee:

Committee Action: *Disapproved*

Committee Reason: *The current text requires full width and assumes that the headroom height will be provided immediately. Since these doors move up, the proposal needs to address when the full height for the means of egress would be provided – this is critical for adequate headroom during egress. It is a concern that these doors, when not yet fully open, may be a hazard for a visually impaired person during egress. There are issues for the change in forces and lifting vs. pushing to open the door in manual operation – information is needed on if this operation is doable by all persons using the means of egress. This new technology should be in a separate section to deal with the specific provisions/concerns for this type of door rather than trying to fit this in with horizontal sliding doors. The section should address requirements to prevent vertical sliding doors from coming down without warning.*

(The complete Report of Hearings from the Code Development Hearings in Baltimore can be found at the following web location: [http://www.iccsafe.org/cs/codes/Pages/09-10\\_ROH.aspx](http://www.iccsafe.org/cs/codes/Pages/09-10_ROH.aspx) )

The comments received during the alternative criteria process, and the actions taken at the code development hearings, indicate that more time is needed to address the issues concerning this proposed criteria. These issues include, but are not limited to: provisions for required manual operation, including range of motion and forces that would be required to open and close vertically acting egress fire-doors; provisions for required accessibility features, including

those for persons with visual impairments; provisions for required use of vertically acting egress fire-doors to retard the spread of smoke and fire; limitations to the installation of vertically acting egress fire-doors in relation to the devices required for their operation; and which standards should govern the use of vertically acting egress fire-doors.

Staff recommends further study of this criteria, because staff believes that additional time is needed to allow interested parties to address staff comments. Staff welcomes any input the committee and interested parties might have on staff comments, and the committee should then take action as it thinks appropriate.

Thank you for your consideration of the above items.