

MISC1-0610-R1

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Staff
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900 Montclair Road, Suite A
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16 June, 2010

RE: MISC1-0610-R1, Use of "Standards"
SEAOC Evaluation Report Committee Position and Comments

Dear Staff,

In response to the ICC-ES request for input regarding the MISC1, dated May 13, 2010, the SEAOC Evaluation Report Committee has reviewed the subject letter, vetted, and voted on the position provided herein.

We concur with the adoption of the most up-to-date testing and design standards on a case-by-case basis. For the most part, where the more recent standard is more conservative than its predecessor, the use of the latter standard is reasonable, in fact, preferred. We note, however, an updated standard, particularly a design standard, may remove unnecessary conservatism, and that too can be incorporated by an AC under the grounds of Section 104.11 of the International Building Code. As always, a supplant of the code/standard should be clearly identified in the relevant documents.

We are available to assist on the case-by-case assessments.

Respectfully,

SEAOC, Evaluation Report Committee, Chair
Mark A. Moore, SE