

Overland Park ICC Code Hearings Bring New Challenges

A number of important issues facing the NSA membership were on the agenda during the current ICC code development cycle. Overland Park, KS, was the setting for the ICC Final Action Hearings for the 2003/2004 ICC code development cycle. Hundreds of code proposals were considered and acted upon by the ICC governmental representatives. These hearings marked the completion of this code cycle, which began with proposals considered by various code change committees during hearings held last fall in Nashville, TN. The next ICC cycle will commence with proposals due for submittal in August as part of the ICC's 2006 code development cycle. This next round of code proposals will be heard by committees in early 2005.

NSA has been working during this past cycle to oppose a proposal that would require minimum sill heights for residential windows located more than 72" above grade. RB205, which was

approved by the IRC Building/Energy Committee in Nashville and again by the assembly at the Final Action Hearings, includes the following new text:

R613.2 Window Sills. *In dwelling units, where the rough opening for the sill portion of an operable window is located more than 72 inches above the ground or other surface below, the rough opening for the sill portion of the window shall be a minimum of 24 inches above the finished floor of the room in which the window is located.*

Exception: *Windows whose openings will not allow a 4 inch diameter sphere to pass through the opening when the opening is in its largest opened position.*

The stated reason for this code change proposal is to prevent child falls from windows. This proposal was approved by the assembly despite the fact that the proponent failed to supply any technical

justification for this measure, and despite the recommendations of safety advocates advising against setting sill height minimums. NSA's membership and other building product industry representatives have serious concerns about the potentially dangerous effect of this code change on emergency escape and rescue. These concerns become even more compelling when considering the fact that the proponent has been unable to provide a link between sill heights and child window falls. The NSA's positions on the subject of child window falls have not changed.

NSA believes:

- *That setting a sill height minimum – any sill height – is very dangerous because of the potential negative impact on emergency escape and rescue.*
- *That the best way to reduce the number of child window falls in*

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ICC Code Hearings continued...

the U.S. is through education about proper supervision, furniture placement, window screens and the appropriate use of window guards, which bear immediate results. Even if a code solution to child falls could be found, it would not have a measurable effect on child falls for years to come.

- *That the labeling of window screens is an important part of child fall awareness. NSA members should continue to consider the use of voluntary warning labels advising caregivers that screens are not designed nor intended to keep children from falling.*
- *That the proponents of using sill height minimums as a means to prevent or reduce child falls have not provided any data to support the concept itself or that any specific height will have a measurable difference, and won't in fact make the problem of child falls worse.*

That last statement strikes at the very heart of the sill height issue. The proponents testified during the final action hearings that the proposal was "not about statistics." Any change to residential architecture that may affect life safety should include consideration for all of the potential impacts on the various safety issues. In fact, a letter from the National Safety Council urging the ICC to disapprove any proposal on sill heights as a way to reduce child falls without a full study of the effect on emergency escape and rescue as well as child falls.

NSA and other code and regulatory stakeholders are very concerned that in spite of overwhelming technical evidence and the input from safety advocates, the ICC decided to ignore the advice of safety experts and approve the sill height proposal. We will explore the impact of this proposal and consider the best course of action during the coming weeks.

Codes & Standards Update by Michael Fischer, NSA Technical Director

In other action during the final action hearings, the assembly considered several public comments affecting the energy code proposals submitted by the US Department of Energy and approved with some modifications during the code committee hearings in Nashville last fall. The actions of the Energy Code Committee that clarified sunroom prescriptions were carried forward by the assembly in Overland Park, KS. Below are excerpts from the text of EC48:

SUNROOM: *A one-story structure attached to a dwelling, with a glazing area in excess of 40 percent of the gross area of the structure's exterior walls and roof.*

THERMAL ISOLATION: *Physical and space conditioning separation from conditioned space(s). The conditioned space(s) shall be controlled as separate zones for heating and cooling or conditioned by separate equipment.*

402.2.10 Thermally Isolated sunroom insulation. *The minimum ceiling insulation R-values shall be R-19 in zones 1 through 4 and R-24 in zones 5 through 8. The minimum wall R-value shall be R-13 in all zones. New wall(s) separating the sunroom from conditioned space shall meet the building thermal envelope requirements.*

402.3.5 Thermally isolated sunroom U-factor. *For zones 4 through 8 the maximum fenestration U-factor shall be 0.50 and the maximum skylight U-factor shall be 0.75. New windows and doors separating the sunroom from conditioned space shall meet the building thermal envelope requirements.*

The requirements for sunrooms as shown above will be a marked improvement in the IECC. Several clarifications related to sunroom prescriptions were included in the DOE package.

For example:

- Sunroom definition: the word "addition" was removed from sunroom, providing for a clearer understanding of how the provisions can apply to new construction as opposed to remodeling projects.
- Thermal isolation definition: The revised definition provides a greater clarification of the space separation critical to the concept.
- Text sections: In the 2003 IECC, the sunroom

prescriptive values appear as footnotes to the table for replacement fenestration values. Those footnotes were then linked to replacement or renovation as opposed to new construction. With this rewrite, the sunroom provisions will be contained in separate paragraph sections, making future modifications easier, and better facilitating local interpretation.



- Skylight U-factor: With this rewrite, the sloped glazing and skylight U-Factors not previously addressed were included. Testing protocols for horizontal assemblies that affect the actual U-factor rating dictate that these elements have a distinct performance requirement from vertical fenestration products.

With the completion of this cycle, the NSA will have one final opportunity to complete the requirements for sunrooms in the IECC. Another benefit for the sunroom industry, as a by-product of the DOE proposal, is the elimination of the window-to-wall ratios that formed the basis for fenestration performance values in the 2003 IECC. While the values will be more stringent, the end result is that sunrooms that are able to meet the same requirements as conventionally framed wood structures for wall and ceiling R-Values and U-factor ratings for windows and skylights will be allowed to be constructed open to the rest of the home and without a limit on glazing percentages.

Coming in the next issue...

- *NSA Fall Meeting Preview*
- *President's Report*
- *Code Action and Update*
- *Website Report*
- *Affiliate Profile*

and much more...

NSA Technical Committee Meets in Columbus

The NSA Technical Committee met in late April in Columbus, Ohio, to continue working on a number of important issues on behalf of NSA members:

- Discussion regarding product definitions and how they affect code strategies
- Energy Code and NFRC Issues
- Roofing issues and shingle use on sandwich panel assemblies
- Foamed plastic protection/ thermal barrier issues
- General code issues that affect permitting and code compliance
- Snow load factors discussion, centering on the application of ASCE-7 in the IRC

- Sandwich panel structural testing requirements, including a discussion regarding ICC ES
- Voluntary specifications review focusing on how the industry standards may best facilitate code development and other regulatory issue

The NSA Technical Committee, while including a broad cross-section of industry members, is always open to adding new members. If you would like to be part of this important and exciting work, please contact NSA staff. The Committee will continue to push toward solutions to the regulatory problems facing our members, as a key ingredient to the responsible advocacy that is such a big part of the NSA's mission.

NSA General News

Hershberger Named President of PGT Industries

Rod Hershberger, who currently serves on the NSA Board of Directors, has been named President and Chief Operating Officer (COO) of PGT Industries. Previously he served as Executive Vice President and COO. Hershberger has been with the company for 23 years and has designed a number of PGT's products.

"Rod is a leader in our industry," said Randy White, previous president, who will remain as the company's Chief Executive Officer. "Rod's new role recognizes his ability to design a winning corporate culture as well as winning products."

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Submit your information to the Sunroom News!

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NSA Spring Meeting 2005
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Las Vegas, NV

*Education Seminars • Design Awards Winners
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2004 Design Awards

ENTRY QUALIFICATIONS

All sunrooms, solariums and patio covers constructed in the U.S. or Canada and installed between January 1, 2003 to June 1, 2004 are eligible for the NSA 2004 Design Awards. Sunrooms owned by employees or proprietors of the sunroom dealership or their families are not eligible for the Design Awards competition.

ENTRY REQUIREMENTS

There is no entry fee. Contestants may submit more than one entry. For each submission, an entry form must be completed in full and submitted with at least two color transparencies or prints (preferably an interior and exterior) and a floor plan/design layout with orientation and exposure information. Additionally, a one paragraph energy summary of the sunroom is required, as well as a detailed listing of materials used in the construction. Photocopied entry forms are permitted. Any entry that is not signed will be disqualified.

JUDGING CRITERIA

Judging is based on how the sunroom, solarium or patio enclosure enhances the architecture and natural surroundings of the home and its energy efficiency. Awards will be divided into categories based on the cost of the entry.

AWARDS

All entries in the competition will be posted on our website at www.nationalsunroom.org for consumers to view until the 2005 competition, including contact information for the dealership which installed the entry. Finalists of the NSA 2004 Design Awards in each category will receive a local press release announcing the finalist's achievement. The winners of the competition will be announced during the NSA Annual Meeting at the Monte Carlo Casino and Resort in Las Vegas in February, 2005. The four winners of the competition will be interviewed on camera for the creation of a media DVD. The winners will also receive full media kits (including a local and national press release, a DVD of the winning entry, an advertising one-sheet for the entry, and a certificate for display) for use with local press, as well as national recognition and acclaim.

DESIGN AWARD ENTRY FORM

(Please check the price category of your nomination)

Glazed Roof Sunrooms Less than \$25,000 _____

Glazed Roof Sunrooms \$25,000 and Over _____

Opaque Roof Sunrooms Less than \$25,000 _____

Opaque Roof Sunrooms \$25,000 and Over _____

Date Completed: _____

Total Retail Value: _____

Dealer (Name): _____

Address: _____

City/State/Zip: _____

Contact: _____

Phone: _____

Manufacturer: _____

Address: _____

City/State/Zip: _____

Contact: _____

Phone: _____

Homeowner: _____

Address: _____

City: _____

State/Zip: _____

Phone: _____

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