

---

**Subject:** RE: Labor & Industry Proposed Regulation #12-94 (IRRC #2937): "Uniform Construction Code"

---

**From:** Elam M. Herr [<mailto:eherr@psats.org>]

**Sent:** Tuesday, May 01, 2012 7:02 PM

**To:** Michelle L. Elliott

**Cc:** Smith, James M.

**Subject:** RE: Labor & Industry Proposed Regulation #12-94 (IRRC #2937): "Uniform Construction Code"

Michelle: We have reviewed the proposed Labor and Industry regulation #12-94 (IRRC #2937) and offer the following. The regulations seem pretty straight forward in that they are adopting Chapter 11 and appendix E of the 2012 IBC and the ICC/ANSI A117.1-2009. These sections address accessibility issues covered in the law. What is not clear is that there are other references to the accessibility issues in other chapters of the IBC and the IEBC (Existing Building Code) that is used as a compliance path for Chapter 34 of the IBC, which are not addressed in this regulation. We question how the adoption of Chapter 11 will work if the other chapters are not addressed? This could result in problems being encountered by code officials when they are inspecting buildings for compliance.

We appreciate the opportunity to review and comment on the regulations. We look forward to working with you and IRRC on this regulations and in the future. Elam

Elam M. Herr  
PSATS  
4855 Woodland Drive  
Enola, PA 17025-1291  
717-763-0930  
[eherr@psats.org](mailto:eherr@psats.org)

RECEIVED  
IRRC

2012 MAY -2 AM 10: 37