

MEMORANDUM

TO: All Interested Parties
FROM: Enrique Gonzalez, Staff Liaison
DATE: August 22, 2017
SUBJECT: Proposed TIA (Log No. 007-15) to UNIFORM MECHANICAL CODE, Section 1105.1.

In accordance with the IAPMO Regulations Governing Committee Projects, the attached proposed Tentative Interim Amendment (TIA) to the 2015 edition of the UNIFORM MECHANICAL CODE is being submitted for public comment. The TIA (Log No. 007-15) is on UMC, Section 1105.1.

We invite all interested parties to review the proposed TIA. If you wish to submit a comment in regards to this TIA, fill out the [TIA Comment Form](#). Email the completed form to enrique.gonzalez@iapmo.org. The closing date for submitting comment forms for this TIA is Tuesday, September 5, 2017.

Thank you for your time and interest in the development of the Uniform Mechanical Code.

In accordance with the IAPMO [Regulations Governing Committee Projects](#) this, a proposed TIA which has been submitted for processing pursuant to 5-1 of the Regulations, will be automatically docketed as an appeal on the agenda of the IAPMO Standards Council. Any party may advocate their position before the Council. Please note that most Council meetings are held via teleconference.

Parties wishing to address the Council shall notify the Council Secretary no later than 48 hours prior to the Council meeting. Although not required, parties wishing to advocate a position are encouraged, to the extent practicable, to file written submissions in general conformance with sections 1-6.3 and 1-6.4 of the Regulations in advance of the meeting at which action will be considered.

When an automatically docketed appeal has not been pursued by any party, the Council will not consider the matter as an appeal.

This TIA will be on the Council agenda schedule – date to be determined.

FORM FOR TIA COMMENT ON IAPMO UPC/UMC COMMITTEE DOCUMENT

NOTE: All comments MUST be received by 5:00 PM PST on Tuesday, September 5, 2017.

For further information on the standards-making process, please contact
Codes and Standards Administration at 909-472-4110

For technical assistance, please call IAPMO at 909-230-5535

FOR OFFICE USE ONLY

RESP # : _____

DATE REC'D: _____

Date: _____ Name: _____ Telephone #: _____

Company: _____

Street Address: _____ City: _____ State: _____ Zip: _____

Please Indicate Organization Represented (if any): _____

1. a) IAPMO Document Title: Uniform Mechanical Code Document Year: 2015

b) Section/Paragraph: Section 1105.1

c) Comment on TIA: UMC 007-15

2. Comment Recommends (check one): AGREE DISAGREE

3. Substantiation for Comment:

Signature (**Required**): _____

Please use separate form for each comment.

INSTRUCTIONS FOR SUBMITTING COMMENTS
– PLEASE READ CAREFULLY –

1. Complete form digitally by filling in each item described.
2. Check the appropriate box to indicate whether this comment recommends agreeing or disagreeing with the proposed TIA.
3. In the space title “Substantiation for Comment”, state the reason for your comment.
4. Sign the comment. (Required)

NOTE: The IAPMO Regulations Governing Committee Projects in Section 5-4(c): All public comments, ballots, and comments on ballot on the proposed TIA shall be summarized in a staff report and forwarded to the Council for action in accordance with Section 5-5.



Air Conditioning Contractors of America

UNIFORM MECHANICAL CODE TIA FORM - 2015

Reference Code Section: 1105.1 Human Comfort

Submitter Name: David C. Bixby
Company: Air Conditioning Contractors of America (ACCA)
Address: 48 Kenlauren Avenue, Greenville, SC 29607
Phone number: (301) 525-5503

Proposed language for TIA:

1105.0 General Requirements.

1105.1 Human Comfort. Cooling systems used for human comfort shall be in accordance with the return-air and outside-air provisions for furnaces in Section 904.7 and Section 904.8. Cooling equipment used for human comfort in dwelling units shall be selected in accordance with ACCA Manual S to satisfy the calculated loads determined in accordance with ~~the reference standards in Chapter 17~~ ACCA Manual J or other approved methods. Refrigerants used for human comfort shall be in accordance with Section 1104.6.

Substantiation:

Technical Merit: The 2015 edition of the UMC references ACCA Manual S (Residential Equipment Selection) and ACCA Manual J (Residential Load Calculation) in Appendix E, which is written in non-mandatory unenforceable language. Also, Manual S does not even appear in Table 1701.1. Recently, the 2014 edition of ACCA Manual S and the 2016 edition of Manual J were updated to include a Normative code-enforceable section. This means that ACCA Manuals S and J can be easily used by code officials for enforcement, and thus both Manuals need to be included in a mandatory section of the code and both referenced in Table 1701.1. The most applicable requirement to mandate Manuals S and J is under 1105.1, Human Comfort. ACCA Manual S and Manual J are ANSI standards and meet the requirements for a mandatory reference standards in accordance with Section 3-3.7.1 of IAPMO's Regulations Governing Projects.

Emergency nature: The emergency nature of this proposed TIA is supported by Section 5-2(a) "*The document contains an error or an omission that was overlooked during a regular revision process.*" Manuals S and J are not mandatory requirements in the 2015 UMC, and are only mentioned in non-mandatory Appendix E. Moreover, Manual S is not even in Table 1701.1. The use and enforcement of Manual S as mandated by the code is critical to determine the design, sizing and selection of heating and cooling equipment, plus the mandated use of Manual J is critical for calculating the cooling/heating loads to determine duct sizing and equipment selection. Without mandating Manuals S and J, the safety and performance of the HVAC system can be adversely affected and can potentially impact the health and safety of the occupants.

I hereby grant IAPMO all and full rights in copyright, in this proposal, and I understand that I acquire no rights in any publication of IAPMO in which this proposal appears in this or another similar or analogous form.

Submitter signature (required): David C. Bixby Date: 31 July 2017