

December 13, 2011

Florida Department of Business & Professional Regulation
1940 North Monroe Street
Tallahassee FL 32399

Attention: Mo Madani

Regarding: ASTM 1996-05 Equivalency Letter

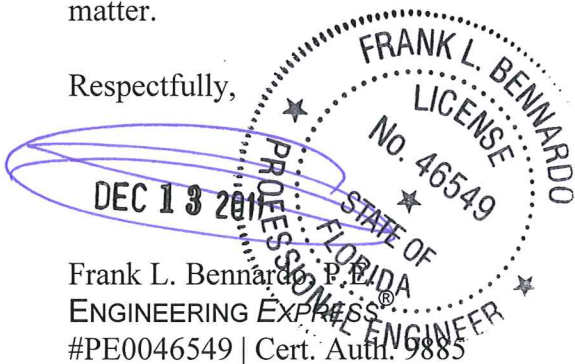
It has come to our attention that ASTM 1996-05 was omitted as a referenced standard in the 2010 Florida Building Code. This letter serves to request that rule 9N-3 be reopened to consider adding this standard as an equivalency to the referenced ASTM 1996-02 and ASTM 1996-06 which do appear as referenced standards.

After review of each of these standards, it is our opinion that ASTM 1996-05 is equivalent to 1996-02, and for impact protective devices is equivalent to 1996-06. At no time does it appear that ASTM E1996 has lessened since the '02 version. The measurable differences we see between ASTM 1996-02, ASTM 1996-05, and ASTM 1996-06 are:

- ASTM 1996-05 further details on how to retest during failures vs. '02 (section 4.1.1.3) which is carried into '06.
- Clarification of porous vs. non-porous additional safety factor for deflection in '06 (section 7.1).
- Porous product qualification as it relates to testing (sections 8.2, 8.3, 8.5) which are also carried into '06.
- Minor clarifications and changes not affecting the overall performance of the standard.

We request that the Department review this oversight for the betterment of the industry, and transition to the 2010 Florida Building Code. Thank you for your prompt attention to this matter.

Respectfully,



Frank L. Bennardo, P.E.
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