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Paula Ford, Agency Clerk
Florida Building Commission
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

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GENERAL COUNSEL'S OFFICE

**Petition for Declaratory Statement
From the Florida Building Commission**

RE: Section 2.12 –Definitions
Florida Building Code Residential

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FILING AND ACKNOWLEDGEMENT
FILED on this date, with the designated
Clerk, receipt of which is hereby
acknowledged.
Paula P. Ford 3/17/08
Paula P. Ford
Commission Clerk
Date

An interpretation is requested for the word "open" in the definition of a sunroom.

The Residential Building Code contains a definition for a sunroom. The definition for a sunroom states the following.

SUNROOM.

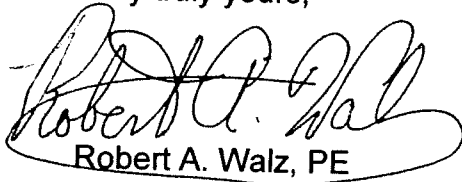
1. A room with roof panels that include sloped glazing that is a one-story structure added to an existing dwelling with an open or glazed area in excess of 40 percent of the gross area of the sunroom structure's exterior walls and roof.
2. A one-story structure added to a dwelling with structural roof panels without sloped glazing. The sunroom walls may have any configuration, provided the open area of the longer wall and one additional wall is equal to at least 65 percent of the area below 6 foot 8 inches (2032 mm) of each wall, measured from the floor.



The word "open" is confusing in that it does not define open to what elements. A solid glass window would be open to sunshine. An operable window would be open to sunshine and air. A sliding glass door would be 100% open if the only element in question was sunshine. The same door would only be 50% open if the elements in question included sunshine and air. Does "open" require a specific size to be "open" for a specific reason.

Clarification of this definition will provide a better understanding of a sunroom structure.

Very truly yours,



Robert A. Walz, PE