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0 CA08-DEC 204  
FILING AND ACKNOWLEDGEMENT  
FILED, on this date, with the designated  
Clerk, receipt of which is hereby  
acknowledged.  
Paula P. Ford 7/15/08  
Paula P. Ford Date  
Commission Clerk

July 11, 2008

Florida Building Commission  
Paula Ford  
2555 Shumard Oak Blvd.  
Tallahassee, FL 32399

RE: Request for Declaratory Statements Regarding Rule 9B-72

Dear Ms. Ford,

This is to confirm our understanding as a Product Validation Entity through our communication with Mr. Mo Madani and a request for declaratory statements on the following two items.

1. Please confirm that it is true that the final check on the "Administrative Validation Checklist" that states "*.....the Certification documentation submitted with this application indicates that the product, method, or system described in this application meets or exceeds the Florida Building Code requirements and reference standards listed in the application*" is intended for the Validation Entity to validate to the Commission product compliance ONLY with the test standards referenced in the Florida Building Code and is NOT intended to include the full scope of the Florida Building Code. Mr. Madani confirmed this to be the case during telephone discussions.
2. Please confirm that the Florida Building Commission is willing to accept "Administrative Validation Checklist" submittals from UL in which Check Box #12 is checked recognizing that Check Box #12 is not applicable to "Administrative Validation Checklist" submittals from UL.
  - Reason - Check Box #12 that states "*If the documentation indicates that rational analysis was used, verify whether that rational analysis is within the scope of the product certification and if not then verify that an evaluation report is submitted*" is not applicable to any of the applications that UL will be requested by its customers to validate. All Applications that UL will be requested to validate will not use rational analysis or have an evaluation report submitted with their submittal to the Commission. All Applications that UL will be requested to validate will use UL product certification. For this reason, Check Box #12 does not apply when UL submits the Validation Checklist. However, the Florida Building Commission electronic automated "Administrative Validation Checklist" submittal process has been programmed to require all Boxes to be checked to submit a Validation Checklist. During discussions with Mr. Madani, he agreed that for those applications for which UL will act as a Validation Entity, box #12 on the Validation Entity Checklist will not apply. He also explained that the electronic Checklist can not be reprogrammed to allow boxes to be left unchecked when they don't apply.
  - Solution - Please confirm that the Florida Building Commission is willing to accept submittals from UL in which Check Box #12 is checked recognizing that Check Box #12 does not apply.

Thank you for your consideration of these issues. We appreciate your development of Declaratory Statements to rectify each of the issues.

Best regards,

Robert Jamieson  
General Manager North America Fire, Security and Signaling Sector  
Underwriters Laboratories Inc.