

June 16, 2005

Paula Ford
Clerk of the Commission
Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399

DCA05-DEC-113
FILING AND ACKNOWLEDGEMENT
FILED, on this date, with the designated
Clerk, receipt of which is hereby
acknowledged.

Paula P Ford 6/17/05
Paula P. Ford Date
Commission Clerk

Petition for Declaratory Statement before the Florida Building Commission

Petitioner:
David G. Karins, P.E.
Karins Engineering Group, Inc.
2206 Jo-An Drive
Sarasota, FL 34231
(941)927-8525
Fax: (941)927-8075

Petitioner requests a Declaratory Statement regarding, generally, to part VII of ch. 553, "Florida Building Code."

Specifically, interpretation is requested of:

Section 1610 Deflections and 1612 High Velocity Hurricane Zones (HVHZ)– Deflection, Florida Building Code, Building Volume (2001, as amended June, 2003);

- and -

Section 1604.3 Serviceability and 1613 HVHZ – Deflection, Florida Building Code, Building Volume (2004)

As pertaining to composite aluminum/fiberglass (glass reinforced plastic) translucent panels used in skylight, translucent panelized wall and window applications that do not support brittle components finishes or other items.

The statutes, rules or orders will substantially affect the petitioner's client, Kalwall Corporation and manufacturers of similar products as to the structural requirements for the product components and consequently the cost of the product to the consumer.

Bearing in mind that no brittle materials would be supported by or fastened to the panels, and that the panels are able to deflect without damage to the panel or anchorage, and that the panels are tested for impact resistance, we request a finding by the Commission that the panels are not specifically identified and shall not be governed by the deflection limits listed in the Code Sections referenced above.

To bolster the case for granting this request, we request consideration of the following. It is our opinion that the deflection requirements of the Code exist to prevent risk to health and welfare as well as risk of expense due to failure of building components and finishes, or due to breaching the building envelope as result of deflection exceeding the limits prescribed by the Code. Where panels are constructed of materials that are

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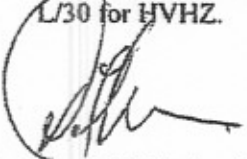
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able to withstand deflections without such damage, failure or breach of envelope, the intent of the code is satisfied. Specific and clear examples of this reasoning exist in the Code.

The panels are analogous to structural cladding as described by the Second Note under Table 1610.1 of FBC2001 and note a. under Table 1604.3 of FBC2004. This note specifies that total load deflection shall not exceed L/60 for structural roofing and siding made of formed metal sheets in the Non-HVHZ. Though different materials, the panels are similar to the specified cladding in that they attach to the building structural components, in that no finishes are fastened to them and in that deflection on the order of L/60 would not damage the panels or anchorage.

Within the HVHZ, no specific deflection limits are specified to govern cladding. However, where the panels are tested to resist impact, the effect of the panels on the building is analogous to storm shutters in that deflection that does not result in a breach of the building envelope or any effect on other building components is permitted to be L/30.

Consequently we request a declaration that deflection requirements listed above are not applicable to panels as described herein. Alternately, if this declaration is not supported by the Commission, we request a declaration establishing the limits of deflection for panels as described herein as L/60 for Non-HVHZ and L/30 for HVHZ.



David G. Karins, PE
President
Karins Engineering Group, Inc.
FL Registration #52677



"Linda Cavalieri"
<lc@keg-engineering.com>
06/17/2005 12:19 PM

To <paula.ford@dca.state.fl.us>
cc
bcc
Subject Petition for Declaratory Statement before the Florida Building
Commission

Dear Ms. Ford,

RE: FL4097, Skylights; FL4229, Windows; FL4230, Panel Walls

Attached please find a "Petition for Declaratory Statement before the Florida Building Commission" pertaining to Product Approval projects for Kalwall Corporation: FL4097, Skylights; FL4229, Windows; FL4230, Panel Walls. The processing of this document for review by the commission during this current session is appreciated.

Please do not hesitate to provide your additional questions, comments or directions to us via phone, fax or email. Thank you again for your assistance in this matter

Linda Cavalieri

Linda M. Cavalieri, Assistant to David G. Karins, PE Mark A. de Stefano, PE John F. Bonacci, PhD
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