**Roofing Technical Advisory Committee – Comments**

**7th Edition (2020) Florida Building Code, Building**

**CHAPTER 15 ROOF ASSEMBLIES AND ROOFTOP STRUCTURES**

R- Ch. 15- Comment #1

**From:** Rodriguez, Gaspar (RER) [mailto:Gaspar.Rodriguez@miamidade.gov]   
**Sent:** Thursday, December 19, 2019 11:15 AM  
**To:** Madani, Mo  
**Subject:** Comment on 2020 FBC Draft

Good afternoon Moe,

Upon reviewing of the 2020 FBC Draft I noticed the following faults, which I would like to address.  Mainly we are dealing with issues that are just typo fixes.

1. First page of attachment is from the Draft Code Pg471, there is the simple SF instead of SSF.
2. Second page attachment is from the Draft Code Pg473, there are additional zones that should be added.
3. Third page of attachment is from the Draft Code Pg474, there are several subscripts that need correction and NOA should be replaced with Product Approval.

Please advise me on whether this is sufficient documentation for the comment period or is there another format I should follow.

(See attachment 2)

**TAC Recommendation:**

**Commission Action:**

R- Ch. 15- Comment #2

**From:** Mike Silvers [mailto:Silvers@floridaroof.com]   
**Sent:** Thursday, December 19, 2019 6:53 PM  
**To:** Madani, Mo  
**Cc:** T. Eric Stafford; Keeler, Greg; Rick Olson; Lisa Pate; Meghan Roth  
**Subject:** Comments on the draft 7th Edition (2020) update to the FBC - Tile Underlayment

Mo,

After a thorough review of the new “Sealed Deck” underlayment requirements, we discovered a unintended consequence of the change and a potentially troubling issue. The modifications are 7696 and R7694. I have talked to the proponent, as well as those who offered amendments and they agree this should be corrected. I have attached our proposed changes to the applicable sections of the two modifications. The specific sections shown in blue should be removed. The language in 1507 Requirements for Roof Coverings, 1507.3 Clay and concrete tile, 1507.3.3 Underlayment states:

***Unless otherwise noted****, underlayment shall be applied according to the underlayment manufacturer’s installation instructions or the recommendations of the FRSA/TRI Florida High Wind Concrete and Clay Roof Tile Installation Manual, ~~Fifth~~ Sixth Edition where the basic wind speed Vasd, in accordance with Section 1609.3.1 or the recommendations of RAS 118, 119 or 120.*

The term “Unless otherwise noted” could make the new underlayment additions to 1507.1.1.2 a code acceptable option by being the “otherwise noted”. These new options were not intended to be a stand alone option for roof tile underlayment and would lead to substandard installations.

Roof tile underlayment as described in the FRSA/TRI Manual must comply with the appropriate uplift pressures of ASCE 7. It is the only steep slope underlayment to do so. The only information in the previous underlayment section was in the table and referred you to 1507.3.3. This requested change will bring us back to that approach.

In my narrative I referred to the Building sections of the code. The same change will need to be made in Residential section also.

Respectfully submitted,

**Mike Silvers, CPRC**

Director of Technical Services

FRSA, PO Box 4850, Winter Park, FL 32793

Requested Change to Modification 7696 (Changes in Blue) Note: R7694 will have the same changes.

(7696 A1+A2+A3+Original + handout/Commission)/ (R7580)/ (R8061)

**1507.1.1.2 Underlayment for concrete and clay tile.** Underlayment for concrete and clay tile shall comply with **1507.3.3** ~~one of the following~~:

1. ~~The entire roof deck shall be covered with an approved self-adhering polymer modified bitumen underlayment complying with ASTM D1970 installed in accordance with both the underlayment manufacturer’s and roof covering manufacturer’s installation instructions for the deck material, roof ventilation configuration and climate exposure for the roof covering to be installed.~~
2. ~~A minimum 4-inch-wide (102 mm) strip of self-adhering polymer-modified bitumen membrane complying with ASTM D1970, installed in accordance with the manufacturer’s instructions for the deck material, shall be applied over all joints in the roof decking. An underlayment complying with Section R905.3.3 shall be applied over the entire roof over the 4-inch-wide (102 mm) membrane strips.~~
3. ~~A minimum 3 ¾-inch wide (96 mm) strip of self-adhering flexible flashing tape complying with AAMA 711-13, Level 3 (for exposure up to 176° F (80° C), installed in accordance with the manufacturer’s instructions for the deck material, shall be applied over all joints in the roof decking. An underlayment complying with Section 1507.3.3 shall be applied over the entire roof over the 4-inch-wide (102 mm) flashing strips.~~
4. ~~Two layers of ASTM D226 Type II or ASTM D4869 Type III or Type IV underlayment shall be installed as follows: Apply a 19-inch (483 mm) strip of underlayment felt parallel to and starting at the eaves, fastened sufficiently to hold in place. Starting at the eave, apply 36-inchwide (914 mm) sheets of underlayment, overlapping successive sheets 19 inches (483 mm), end laps shall be 6 inches and shall be offset by 6 feet. The underlayment shall be attached to a nailable deck with corrosion-resistant fasteners with one row centered in the field of the sheet with a maximum fastener spacing of 12 inches (305 mm) o.c., and one row at the end and side laps fastened 6 inches (152 mm) o.c. Underlayment shall be attached using annular ring or deformed shank nails with metal or plastic caps with a nominal cap diameter of not less than 1 inch. Metal caps are required where the ultimate design wind speed, V~~~~ult~~~~, equals or exceeds 170 mph.  Metal caps shall have a thickness of not less than 32-gage sheet metal. Power-driven metal caps shall have a minimum thickness of 0.010 inch. Minimum thickness of the outside edge of plastic caps shall be 0.035 inch. The cap nail shank shall be not less than 0.083 inch for ring shank cap nails. Cap nail shank shall have a length sufficient to penetrate through the roof sheathing or not less than 3/4 inch into the roof sheathing.~~

~~Exception: Compliance with Section 1507.1.1.2 is not required where~~ ~~a~~ ~~fully adhered~~ ~~underlayment is~~ ~~applied in accordance with Section 1507.3.3.~~

**TAC Recommendation:**

**Commission Action:**

R- Ch. 15- Comment #3

**Bryan P. Holland, MCP, AStd.**

**Southern Region Field Representative**

**Revise Section 1510.11**

**1510.11 Cable- and Raceway-Type Wiring Methods.** Cable- and raceway-type wiring methods installed on rooftops~~, when~~ and not encased in a structural concrete ~~environment,~~ shall be supported above the roof system and covering. Cable- and raceway-type wiring methods installed in locations under metal-corrugated sheet roof decking shall be supported so there is not less than 38 mm (11/2 in.) measured from the lowest surface of the roof decking to the top of the cable or raceway. A cable or raceway shall not be installed in concealed locations in metal-corrugated sheet decking–type roof.

**REASON FOR COMMENT AND RECOMMENDED CHANGES:**

* This is a purely editorial change to add clarity and conciseness to the new rule. The term “environment” is not needed and does not have any meaning in the context of this requirement.

**TAC Recommendation:**

**Commission Action:**

**CHAPTER 35 REFERENCED STANDARDS**

R- Ch. 35- Comment #1

**From:** Amanda Hickman [mailto:amanda@thehickmangroup.com]   
**Sent:** Thursday, January 2, 2020 4:06 PM  
**To:** Madani, Mo  
**Cc:** The Hickman Group  
**Subject:** Comments on: Standard update, Mod S7982, Mod 8137 & 8139

Hi Mo,

Happy New Year!  Attached are our comments for the Florida code.  Please confirm that you received.

Thanks,

Amanda

Amanda Hickman  
President/Consultant

Chapter 35 Referenced Standards

ASTM

D6754/D6745M—~~10~~ 15

Standard Specification for Ketone Ethylene Ester Based Sheet Roofing…………………..1507.13.2

The D6754-10 was found to have significant errors in the calculations for determining 2-sigma values for the physical properties.  In fact, the 2010 version only used 1-sigma values and they were determined to be too tight for standard manufacturing process.  If an architect or consultant states in their specification that the product must meet the code mandated standard, that puts the manufacture in a bind unnecessarily. The D6754 standard was re-balloted in 2015 with the new physical properties set at 2-sigma like the other membrane standards and was ratified accordingly. Therefore, we propose updating the standard to the 2015 version.

**TAC Recommendation:**

**Commission Action:**

**7th Edition (2020) Florida Building Code, Residential**

**CHAPTER 9 ROOF ASSEMBLIES**

R- Ch. 9- Comment #1

**From:** Mike Silvers [mailto:Silvers@floridaroof.com]   
**Sent:** Thursday, December 19, 2019 6:53 PM  
**To:** Madani, Mo  
**Cc:** T. Eric Stafford; Keeler, Greg; Rick Olson; Lisa Pate; Meghan Roth  
**Subject:** Comments on the draft 7th Edition (2020) update to the FBC - Tile Underlayment

Mo,

After a thorough review of the new “Sealed Deck” underlayment requirements, we discovered a unintended consequence of the change and a potentially troubling issue. The modifications are 7696 and R7694. I have talked to the proponent, as well as those who offered amendments and they agree this should be corrected. I have attached our proposed changes to the applicable sections of the two modifications. The specific sections shown in blue should be removed. The language in 1507 Requirements for Roof Coverings, 1507.3 Clay and concrete tile, 1507.3.3 Underlayment states:

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Respectfully submitted,

**Mike Silvers, CPRC**

Director of Technical Services

FRSA, PO Box 4850, Winter Park, FL 32793

Requested Change to Modification 7694 (Changes in Blue) Note: R7696 will have the same changes.

(R7694 A1+A2+Original + handout/ Commission)/(R7571)/(R7665)

**R905.1.1.2 Underlayment for concrete and clay tile.** Underlayment for concrete and clay tile shall comply with **905.3.3** ~~one of the following methods:~~

1. ~~The entire roof deck shall be covered with an approved self-adhering polymer modified bitumen underlayment complying with ASTM D1970 installed in accordance with both the underlayment manufacturer’s and roof covering manufacturer’s installation instructions for the deck material, roof ventilation configuration and climate exposure for the roof covering to be installed.~~
2. ~~A minimum 4-inch-wide (102 mm) strip of self-adhering polymer-modified bitumen membrane complying with ASTM D1970, installed in accordance with the manufacturer’s instructions for the deck material, shall be applied over all joints in the roof decking. An underlayment complying with Section R905.3.3 shall be applied over the entire roof over the 4-inch-wide (102 mm) membrane strips.~~
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~~4.  Two layers of ASTM D226 Type II or ASTM D4869 Type III or Type IV underlayment shall be installed as follows: Apply a 19-inch (483 mm) strip of underlayment felt parallel to and starting at the eaves, fastened sufficiently to hold in place. Starting at the eave, apply 36-inchwide (914 mm) sheets of underlayment, overlapping successive sheets 19 inches (483 mm), end laps shall be 6 inches and shall be offset by 6 feet. The underlayment shall be attached to a nailable deck with corrosion-resistant fasteners with one row centered in the field of the sheet with a maximum fastener spacing of 12 inches (305 mm) o.c., and one row at the end and side laps fastened 6 inches (152 mm) o.c. Underlayment shall be attached using annular ring or deformed shank nails with metal or plastic caps with a nominal cap diameter of not less than 1 inch. Metal caps are required where the ultimate design wind speed, V~~~~ult~~~~, equals or exceeds 170 mph.  Metal caps shall have a thickness of not less than 32-gage sheet metal. Power-driven metal caps shall have a minimum thickness of 0.010 inch. Minimum thickness of the outside edge of plastic caps shall be 0.035 inch. The cap nail shank shall be not less than 0.083 inch for ring shank cap nails. Cap nail shank shall have a length sufficient to penetrate through the roof sheathing or not less than 3/4 inch into the roof sheathing.~~

**~~Exception:~~** ~~Compliance with Section R905.1.1.2 is not required where a fully adhered underlayment is applied in accordance with Section R905.3.3.~~

**TAC Recommendation:**

**Commission Action:**

R-General - Comment #1

**From:** Neil Burning [mailto:nburning@ICCSafe.ORG]   
**Sent:** Thursday, January 02, 2020 1:50 PM  
**To:** Madani, Mo  
**Cc:** Campbell, Thomas  
**Subject:** Floridians for Safe Communities Coalition Comments regarding Draft 7th Edition of Florida Building Code

Mo,

I have attached our coalition’s comments regarding the draft 7th edition of the Florida Building Code.

Thank you,

**Neil Burning, CBO**

Vice President, Technical Resources

Government Relations (Florida)

International Code Council

(See Attachment 1)

**TAC Recommendation:**

**Commission Action:**