

Swimming Pool Technical Advisory Committee (TAC) – Comments

9th Edition (2026) Florida Building Code, Building

Errata – Consistency with the Commission's approved modification

SW – Ch. 4 - B Comment #1

Michael Weinbaum

I found three places where the draft FBC was inconsistent with the “R1” versions you posted on floridabuilding.org. They all involve SW11891

Please let me know your thoughts.

For rules 2 and 3, labels “a” and “b” are not in the proposal. It suggests we want rules signs that say 2a and 3a instead of simply 2 and 3. But I agree the proposal language should have had numbers. Here's my suggestion for 2 and 3:

If the pool is fenced,

2. No glass in the fenced pool area.
3. No animals, other than service animals, in the fenced pool area.

If the pool is not fenced (this will only apply to IWFs),

2. No glass within 50 feet of the pool.
3. No animals, other than service animals, within 50 feet of the pool.

The R1 version shows deletion of “Exception: Service animals as defined in s. 413.08, Florida Statutes All animals are prohibited to enter the pool water or onto the drained area of an interactive water feature”. Rule 4 should simply read:

4. Service animals may not enter the water or the splash zone.

SW11891-A5

The R1 version shows quotes around the rule, so that nobody is tempted to put the commentary on the rule sign. These quotes are also found on rules 8, 10, 11, and 12. It should read:

“Do not swallow the pool water, it is recirculated.” This statement shall be added to signs at pools that conduct alterations as that term is defined.

floridabuilding.org. They all involve SW11891

Proposed correction:

454.1.2.3.5 Rules and regulations signage. Rules and regulations for bathers shall be installed in minimum 1-inch (25.4 mm) letters that must be legible from the pool deck, and shall contain the following:

1. No food or beverages other than water in the pool or within 4 feet (1219 mm) of the pool.

Exception: This rule shall not be posted at a swim-up bar that meets the requirements found in Department of Health (DOH) Rule 64E-9.004, *Florida Administrative Code*.

~~2.~~ If the pool is fenced,

~~a. 2.~~ No glass in the fenced pool area.

~~b. 3.~~ No animals, other than service animals, in the fenced pool area.

~~3.~~ If the pool is not fenced (this will only apply to IWFs).

~~a. 2.~~ No glass within 50 feet (15 240 mm) of the pool.

~~b. 3.~~ No animals, other than service animals, within 50 feet (15 240 mm) of the pool.

4. Service animals may not enter the water or the splash zone.

~~**Exception:** Service animals as defined in Section 413.08, *Florida Statutes*. All animals are prohibited to enter the pool water or onto the drained area of an interactive water feature.~~

5. Bathing load: ___ persons.

6. Pool hours: ___ a.m. to ___ p.m.

7. Shower before entering.

8. Pools of 200 square feet (18.58 m²) in area or greater without an approved diving well configuration shall have “NO DIVING”, in 4 inch (102 mm) letters included with the above listed pool rules.

9. ~~“Do not swallow the pool water, it is recirculated.”~~ This statement shall be added to signs at pools that conduct alterations as that term is defined.

10. If the pool includes a sun shelf, “WARNING: DROP OFF AT SUN SHELF EDGE IS ___ FEET: ___ INCHES DEEP” in 2-inch (51 mm) letters. Not required where sun shelves transition to steps.

11. If the pool includes a sun shelf or a zero depth entry area, “DO NOT PLACE FURNITURE IN POOL.” Not required when all movable furniture on the deck or in the pool is entirely made from UV-resistant, inert plastic.

12. “POOL MAXIMUM DEPTH: ___ FEET: ___ INCHES,” in 2-inch (51 mm) letters

TAC Recommendation: Errata – AS – 9-3

Commission Action:

Glitch – Conflict with section 514.0315, Florida Statutes

SW – Ch. 4 - B Comment #2

Bob Vincent

I have provided below the **exceptions** that would relax the ANSI/APSP/ICC standard 16 for hair and body entrapment.

The Department of Health has concerns over a statutory conflict regarding the Florida Building Code 9th edition revision for cold plunge spas in section 454.1.

The 9th edition swimming pool TAC revision SW12252 AM/A2 underlined below conflicts with the 2025 Florida Statutes section 514.0315 for anti-entrapment safety features.

This section of state statutes requires compliance with the “successor standard” for anti-entrapment, which is “ANSI/APSP/ICC-16 2017, Suction Outlet Fitting Assemblies (SOFA) for use in Pools, Spas and Hot Tubs”.

The UL 1563, Electric Spas, allows **exceptions** for suction outlet anti-entrapment safety features in ANSI/APSP/ICC-16 at **UL 1563 section 40.10**, these are snipped below with conflict **exceptions** bolded.

2026 9th edition supplement 454.1 Public swimming pools and bathing places.

Public swimming pools and bathing places shall comply with the design and construction standards of this section.

Exceptions:

3. Portable self-contained factory manufactured cold-spa pools that are listed and labeled in accordance with UL 1563, and operated in accordance with manufacturer’s instructions, are exempt from the provisions of Section 454.1.

... (Step 2 – SW12252 AM/A2 – 2nd comment period)

CORRECTIVE ADDITION SUGGESTED for the 9th edition revision to 454.1 clause #3. After the current language “...listed and labeled in accordance with UL 1563,” please add the following: “and recirculation system suction outlets shall be certified compliant with Florida’s suction outlet anti-entrapment standard ANSI/APSP/ICC—16 2017,”...

2025 UL 1563 Standard for Safety Electric Spas, Equipment Assemblies, and Associated Equipment

Section 40.10 Suction openings 40.10.1 Each spa shall be provided with a minimum of two suction openings, **or one suction opening and a skimmer equipped with a vacuum break.** ...

Exception: A fitting with no marked flow rating need not comply with 40.10.1(a) if it complies with all the provisions of APSP-16 when installed in the spa. Controls shall be adjusted for the maximum water flow through the fitting.

This **exception** would relax the APSP standard #16 for hair and body entrapment.

40.10.5 Suction openings shall be installed in such a manner that it is unlikely both suction openings or a suction opening and skimmer on the same pump can be simultaneously blocked. **The installed fitting(s) and skimmer shall comply with the body entrapment requirements specified in APSP-16.**

Exception No. 1: Constructions where the spa is provided with features, electrical, mechanical, or both that release the pump vacuum in the event both fittings on a single pump are blocked. The functionality of these features shall be evaluated by the Body Entrapment Test in APSP-16. Mechanical or electrical construction features necessary for the function of the system shall be evaluated for reliability.

Exception No. 2: Suction outlets protected by either (1) a suction-limiting vent system with a tamper resistant atmospheric opening or (2) or gravity drainage system.

These **exceptions** would relax the APSP standard #16 for hair and body entrapment.

40.10.8 Skimmers represented by the general descriptions in (a) – (c) and conforming to the overall general shapes and designs (or the equivalent) illustrated in Figure 40.1 – Figure 40.3 are not required to comply with the requirements in 40.10.3 – 40.10.8.

a) Weir door style skimmer

b) Floating Weir Style Skimmer

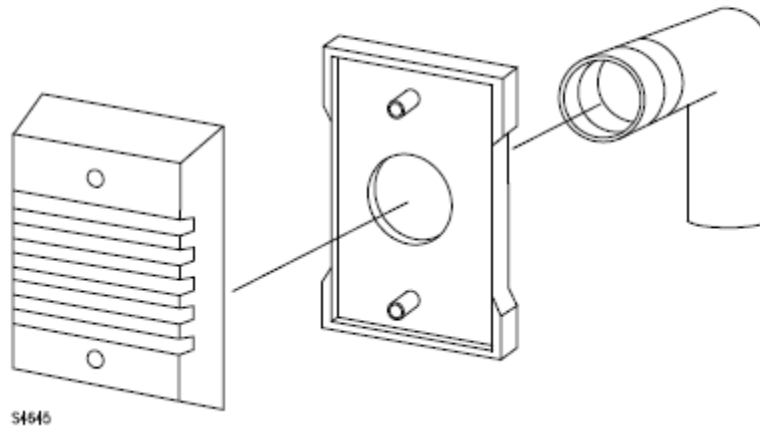
c) Strip Style Skimmer – A vertically-mounted, rectangular-shaped skimmer installed in the side wall of the spa shell. Two-piece construction (faceplate and threaded back plate). ...

Provided with a half inch plumbing connection attached to the threaded back plate. Faceplate is screwed to the threaded back plate and is provided with multiple openings ...

Additional openings are provided either on the tapered sides of the faceplate, or on the threaded back plate having a total area of approximately 3 inches (7.6 cm²). See Figure 40.3 for the general shape and design of strip style skimmer.

This **exception** would relax the APSP standard #16 for hair and body entrapment.

Figure 40.3
Strip Style Skimmer



40.11 Suction openings for cold tubs

40.11.1 A Cold Tub shall comply with 40.10, as applicable.

40.11.2 **As an alternative to 40.11.1, a Cold Tub with low flow water recirculation or filtration only and not provided with high flow jet pump(s) and massage jets, for example with a single skimmer with vacuum break that complies with 40.10.8 and 40.10.9, may be considered acceptable.**

This **exception** would relax the APSP standard #16 for hair and body entrapment.

Comment by Jennifer Hatfield (As approved by the TAC)

Alternatively, if the TAC believes an additional reference to APSP-16 is helpful, we would encourage you to consider revised language that is align with current terminology and other provisions within the Code, as follows:

Exceptions:

3. Portable self-contained factory manufactured cold-spa pools that are listed and labeled in accordance with UL 1563, and operated in accordance with manufacturer's instructions, are exempt from the provisions of Section 454.1. If installed, suction outlet fitting assemblies shall comply with APSP-16.

From: Jennifer Hatfield <jen@jhatfieldandassociates.com>

Date: Wednesday, August 19, 2026 at 9:18 PM

To: "mo.madani@myfloridalicense.com" <mo.madani@myfloridalicense.com>

Cc: Dallas Thiesen <dallas@fspa.com>

Subject: Information for Pool TAC mtg

Good evening Mo – I wanted to provide some information related to glitch comment #2 on the Pool TAC agenda for August 20. My apologies for not getting this to you and the TAC sooner, as I was working with both standard organizations cited within the comment to ensure accuracy in what I am providing.

On behalf of the Pool & Hot Tub Alliance (PHTA), we encourage the TAC to recommend disapproval of this comment, as it is not necessary and as drafted could cause confusion and misinterpretation. The current language does not “relax” anti-entrapment requirements that are provided for in ANSI/APSP/ICC-16 (APSP-16), which is required in order to meet both the Federal Virginia Graeme Baker Pool & Spa Safety Act (VGBA) and section 514.0315, Florida Statutes. Additional background and reasoning is as follows:

1. The current 9th edition exception to s. 454.1 provisions, for portable self-contained factory manufactured cold-spa pools (cold spas) meeting UL 1563 and operated in accordance with manufacturer’s instructions is aligned with federal and state law, **as is**, because UL 1563 requires compliance with ANSI/APSP/ICC-16, meaning UL 1563 requires any Suction Outlet Fitting Assemblies (SOFA) on a cold spa (or hot spa for that matter) to meet APSP-16.
2. APSP-16 covers Suction Outlet Fittings Assemblies (SOFAs) and does not include skimmers under its scope, per section 1.1.4. Please see attached letter confirming this fact from the Chairman of the ANSI/APSP/ICC-16 Standard, which is the successor standard recognized by the Consumer Product Safety Commission (CPSC) for purposes of both federal and state law.
3. Where UL 1563 addresses a configuration outside APSP-16 scope, such as a skimmer with vacuum break, it provides additional product-level safety requirements rather than relaxing APSP-16. Put another way, when a cold spa includes a skimmer, which is outside the scope of APSP-16, UL 1563 provides its own requirements.

A recurring problem in the submitted comment is that it treats APSP-16 as though it governs all suction system application and plumbing decisions. It does not. APSP-16 is a SOFA standard. It establishes requirements for suction outlet fitting assemblies. UL 1563 is the complete product safety standard that evaluates the factory-manufactured spa or cold tub as a listed product and addresses how those components are applied in the product.

This distinction matters. A provision in UL 1563 that addresses product application, paired use, a vacuum break, or skimmer-based architecture should not automatically be characterized as a relaxation

of APSP-16. In several instances, the cited UL 1563 text either directly requires APSP-16 compliance, directly uses APSP-16 testing, or addresses configurations outside APSP-16 scope.

Simply put, if a cold spa is *listed and labeled* to UL 1563, which is required to qualify for the exception adopted into the 9th edition, this means any installed SOFAs on a cold spa must meet APSP-16, per the VGBA and s. 514.0315, F.S. Therefore, glitch comment #2 is unnecessary. Further, PHTA believes comment #2 language, as drafted, will only cause confusion.

We encourage the TAC to recommend disapproval as there is no inconsistency with Florida Statute in the current exception language.

Alternatively, if the TAC believes an additional reference to APSP-16 is helpful, we would encourage you to consider revised language that aligns with current terminology and other provisions within the Code, as follows:

Exceptions:

3. Portable self-contained factory manufactured cold-spa pools that are listed and labeled in accordance with UL 1563, and operated in accordance with manufacturer's instructions, are exempt from the provisions of Section 454.1. If installed, suction outlet fitting assemblies shall comply with APSP-16.

Although we do not think this is necessary, this alternative language approach would be clearer to the code user and remain consistent with both Federal and State Laws.

I will be available on the call tomorrow and appreciate the TACs consideration.

TAC Recommendation: Glitch – AM – 11-1 (TAC included Jennifer Hatfield's amendment "if installed, suction outlet fitting assemblies shall comply with APSP -16)

Commission Action:

Glitch

E – Ch. 35 Comment #2

- Under NFPA 70-23 National Electric Code (NEC) published September 1, 2022, include TIA 23-9 (Effective Date April 10, 2023) - Douglas Dorr
- Respectfully urge the Florida Building Commission to expedite adoption of NEC Tentative Interim Amendment (TIA) 23-9 - **Florida House of Representatives Representative Griff Griffiths**

- Remove the phrase "as published September 1, 2022" from the Referenced Standards section - **Anthony Solino**

Hi Mo,

Attached please find the amended glitch/errata proposed change based on the threat to public safety criteria listed in the call for proposed modifications: Adoption of an updated edition of the National Electrical Code if the Commission finds that delay of implementing the updated edition causes undue hardship to stakeholders or otherwise threatens the public health, safety, and welfare

Best Regards

Doug Dorr

Technical Executive

Electric Power Research Institute

4011 Isle Vista Ave

Belle Isle, FL 32812

ddorr@epri.com

To: mo.madani@myfloridalicense.com

Subject: **Proposed Glitch Code Change:**

From: **Douglas Dorr**

As a member of the National Fire Protection Association (NFPA) experts panel for NEC Article 680.26 and as the Principal R&D Manager for the EPRI Swimming Pool Test Facility, I am proposing the expedited adoption into the Florida Building Code by December 31, 2026, of NEC TIA 23-9 for all new construction of commercial or residential pools.

More specifically this request is to revise Chapter 35 (Referenced Standards) of the Florida Building Code 9th Edition Draft as follows: Under NFPA 70-23 National Electric Code (NEC) published September 1, 2022, include TIA 23-9 (Effective Date April 10, 2023). For convenience, the specific language from TIA-23-9 is included both, as an attachment, and as the last several paragraphs in this proposal.

This proposed code change is requested according to the following Glitch Code Change requirement:
"Adoption of an updated edition of the National Electrical Code if the Commission finds that delay of

implementing the updated edition causes undue hardship to stakeholders or otherwise threatens the public health, safety, and welfare.”

The rationale for the proposed code change is based on the following:

- (a) The proposed code change falls within the glitch criteria stated above - because not including TIA 23-9 in the 9th Edition of the Florida Building Code threatens the public health, safety, and welfare of Floridians and visitors.
- (b) The proposed code change has a Florida specific need because the present Florida adoption does not consider or require minimum safe electric shock drowning criteria of the 2023 NEC, and particularly the published TIA 23-9.
- (c) The impact on small businesses is not significant or slightly beneficial as this early adoption of TIA 23-9 would result in fewer follow up visits and investigation costs to determine why shock complaints may be occurring at a newly constructed in ground swimming pool.
- (d) The proposed code change has a reasonable and substantial connection with the health, safety, and welfare of the general public and in particular fewer electric shock drowning possibilities. See [CPSC reference](#) and [USCG Electric Shock Drowning Report](#).
- (e) The proposed code change strengthens the Florida Building Code’s 9th Edition by bringing it back up to the minimum NEC requirements described in the TIA 23-9.
- (f) The proposed code change adds lower cost options for approved wire types such as approved steel wire mesh, and therefore, does not discriminate against materials, products, methods, or systems of construction.
- (g) The proposed code change strengthens a well-known and approved shock drowning risk mitigation method and as such improves – and does not degrade - the effectiveness of the Florida Building Code.

For reference, On the following pages, I have excerpted NEC TIA 23-9 below and have included the original as an attachment along with this letter.



Tentative Interim Amendment

NFPA[®] 70[®]

National Electrical Code[®]

2023 Edition

Reference: Definition of Pool, and 680.26

TIA 23-9

(SC 23-3-8 / TIA Log #1687)

Pursuant to Section 5 of the NFPA Regulations Governing the Development of NFPA Standards, the National Fire Protection Association has issued the following Tentative Interim Amendment to NFPA 70®, National Electrical Code®, 2023 edition. The TIA was processed by the NEC Code-Making Panel 17 and the NEC Correlating Committee, and was issued by the Standards Council on March 21, 2023, with an effective date of April 10, 2023.

1. *Revise the definition of "Pool" to read as follows:*

Pool. Manufactured or field-constructed equipment designed to contain water on a permanent or semipermanent basis and used by persons for swimming, wading, immersion, or therapeutic purposes, but not including bodies of water incorporated as part of an industrial process or lakes, lagoons, surf parks, or other natural and man-made bodies of water that may incorporate swimming and swimming areas. (680) (CMP-17)

Informational Note: Natural and man-made bodies of water, which includes lakes, lagoons, surf parks, or other similar bodies of water, are addressed in Article 682.

2. *Revise section paragraph 680.26 to read as follows:*

680.26 Equipotential Bonding.

(A) Performance. The equipotential bonding required by 680.26(B) and (C) to reduce voltage gradients in the pool area shall be installed for pools with or without associated electrical equipment related to the pool.

Informational Note No. 1: Some causes of voltage gradients originate outside the premises wiring system and are not within the scope of the NEC. Measures identified in Rule 097D2 of ANSI C2, National Electrical Safety Code, can also serve to address voltage gradients originating on the utility side of the service point.

Informational Note No. 2: By its nature, equipotential bonding of swimming pools and perimeter surfaces involves contact between various metallic materials and the earth. This can, in some cases, expose various specific metals to a corrosive environment, depending on factors such as the type and chemical content of the soil and the specific metal. Corrosive environments are also addressed in 680.14.

(B) Bonded Parts. ...

(1) Conductive Pool Shells. ...

(2) Perimeter Surfaces. The perimeter surface to be bonded shall be considered to extend for 4-m 900 mm (3 ft) horizontally beyond the inside walls of the pool ~~and~~ while also at a height between 900 mm (3 ft) above and 600 mm (2 ft) below the maximum water level. The perimeter surface shall include unpaved surfaces, concrete, and other types of paving. Perimeter surfaces separated from the pool by a permanent wall or building 1.5 m (5 ft) in height or more shall

Comments received:

From: Tarek Gadd <tarek.gadd@sce.com>

Sent: Wednesday, July 22, 2026 11:59 AM

To: Madani, Mo <Mo.Madani@myfloridalicense.com>

Subject: Proposed glitch Code Change: Support for E-Ch. 35 Comment #2

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From: **Tarek Gadd**, PE, Southern California Edison, Senior Engineer 1

I strongly support this comment and urge you to adopt TIA 23-9 into the Florida Building Code by December 31, 2026. The NEC is the minimum level of safety, and no other state has removed this emergency amendment from their adoption of the 2023 Edition or later. The utility companies have had to bear the burden and significant expense of diagnosing and resolving shocks on swimming pools until this misunderstood phenomenon was studied by the panel of experts at the NFPA. This increases electricity costs for all customers, because the problem is not with the delivery of power, but inadequate premises wiring, which clearly falls under the purview of the National Electrical Code.

It is now known that when shocking occurs on pool decks without adequate equipotential bonding, the only resolution is to remove the existing deck, install a steel or copper bonding grid, and reinstall the deck. The cost is substantial and will vary between one and two orders of magnitude more than installing a grid during initial construction.

Installing proper equipotential bonding in a pool is now considered an electrical safety blanket, protecting swimmers from fatal and harmful electrical faults even from pool equipment. Not protecting the public and forcing all customers to pay higher electricity costs is negligent.

Please adopt TIA 23-9 into the Florida Building Code by December 31, 2026.

Thank you,

Tarek Gadd, PE

Power Quality | Distribution Engineering | System Planning and Engineering

M. 626-260-0655

1851 W. Valencia, Fullerton, CA



From: Bill Byrd <wbyrd@privacomventures.com>

Sent: Wednesday, July 22, 2026 11:56 AM

To: Madani, Mo <Mo.Madani@myfloridalicense.com>

Subject: Fla. Building Code Changes.

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Fla. Board Members,

I strongly support this comment and urge you to adopt TIA 23-9 into the Florida Building Code by December 31, 2026. The NEC is the minimum level of safety, and no other state has removed this emergency amendment from their adoption of the 2023 Edition or later. The utility companies have had to bear the burden and significant expense of diagnosing and resolving shocks on swimming pools until this misunderstood phenomenon was studied by the panel of experts at the NFPA. This increases electricity costs for all customers, because the problem is not with the delivery of power, but inadequate premises wiring, which clearly falls under the purview of the National Electrical Code.

It is now known that when shocking occurs on pool decks without adequate equipotential bonding, the only resolution is to remove the existing deck, install a steel or copper bonding grid, and reinstall the deck. The cost is substantial and will vary between one and two orders of magnitude more than installing a grid during initial construction.

Installing proper equipotential bonding in a pool is now considered an electrical safety blanket, protecting swimmers from fatal and harmful electrical faults even from pool equipment. Not protecting the public and forcing all customers to pay higher electricity costs is negligent.

Please adopt TIA 23-9 into the Florida Building Code by December 31, 2026.

Bill

President

William A. Byrd, P.E., C.S.

803-781-7112

C/o PRIVACOM VENTURES, INC.

106 Larkspur Road

Columbia, SC 29212-2047

Gregory L. Olson

Mr. Mo Madani,

I strongly support this comment and urge you to adopt TIA 23-9 into the Florida Building Code by December 31, 2026. The NEC is the minimum level of safety, and no other state has removed this emergency amendment from their adoption of the 2023 Edition or later. The utility companies have had to bear the burden and significant expense of diagnosing and resolving shocks on swimming pools until this misunderstood phenomenon was studied by the panel of experts at the NFPA. This increases electricity costs for all customers, because the problem is not with the delivery of power, but inadequate premises wiring, which clearly falls under the purview of the National Electrical Code.

It is now known that when shocking occurs on pool decks without adequate equipotential bonding, the only resolution is to remove the existing deck, install a steel or copper bonding grid, and reinstall the deck. The cost is substantial and will vary between one and two orders of magnitude more than installing a grid during initial construction.

Installing proper equipotential bonding in a pool is now considered an electrical safety blanket, protecting swimmers from fatal and harmful electrical faults even from pool equipment. Not protecting the public and forcing all customers to pay higher electricity costs is negligent.

Please adopt TIA 23-9 into the Florida Building Code by December 31, 2026.

Thank you.

Gregory L. Olson, P.E., CP2

Gregory L. Olson, P.E., CPQ 2 Arrow Wood Ln 51 Sammys Beach Rd Savannah, GA 31411 East Hampton

Anthony L. Solino

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IAEI Treasure Coast Education Chair

ICC Certified Electrical Plans Examiner / Inspector

NFPA Electrical Inspector Member
UL TC 4, 758, 1563

From: Michael Nappa <michael.a.nappa@gmail.com>
Sent: Saturday, July 18, 2026 12:01 AM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: Pool NEC electrical code for bonding -support TIA

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Hi Mr. Madani,

I support TIA to say that single wire conductor is not sufficient for equipotential, and that the copper mesh be used. I live in NJ and have had experience in bonding since I was having stray voltage / mild shock issues from concrete decking to the water surface in my pool.

Please email me back if you have any questions. I wanted you to get this email by August so it can count towards the specific endeavor to change the building code in Florida.

I support improvement of more than just a single wire buried in concrete decking.

Thank you.

-Mike Nappa



Florida House of Representatives
Representative Griff Griffiths
District 6

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Subcommittee

Joint Committee on Public
Counsel Oversight

July 20, 2026

Florida Building Commission
c/o Department of Business & Professional Regulation
2601 Blair Stone Road Tallahassee, FL 32399

Dear Chair and Members of the Florida Building Commission,

I write today to respectfully urge the Florida Building Commission to expedite adoption of NEC Tentative Interim Amendment (TIA) 23-9 into the Florida Building Code (FBC) for all new commercial and residential swimming pool construction through the glitch/errata process.

As the sponsor of House Bill 405, which included similar language addressing electrical safety and equipotential bonding requirements for swimming pools, I remain committed to ensuring that Florida's Building Code reflects the most current and scientifically supported standards necessary to protect Floridians and visitors. The Commission's timely adoption of TIA 23-9 is essential to maintaining that commitment.

This proposed update meets the statutory requirement for glitch/errata, which allows adoption of an updated edition of the National Electrical Code when delay would cause undue hardship or threaten public health, safety, and welfare. In this case, delaying adoption of TIA 23-9 would do both.

TIA 23-9 addresses critical minimum safety requirements related to electric shock drowning (ESD). Failure to adopt this update leaves Florida pools governed by outdated bonding criteria that do not reflect current research or national safety standards. This poses a direct risk to the public.

Florida has one of the highest concentrations of residential and commercial pools in the nation, with year-round usage and unique environmental conditions. The current Florida Building Code does not incorporate the minimum safe ESD criteria established in the 2023 NEC and refined in TIA 23-9. Florida's pool environment warrants adoption of the most current protections. The proposed change directly supports the health, safety, and welfare of the general public by reducing the likelihood of electric shock drowning incidents.



Florida House of Representatives
Representative Griff Griffitts
District 6

TIA 23-9 expands acceptable bonding materials—including approved steel wire mesh—reducing costs and avoiding discrimination against specific construction materials or methods.

Conclusion

For these reasons, and consistent with the intent of House Bill 405, I respectfully urge the Florida Building Commission to adopt NEC TIA 23-9 into the Florida Building Code, 9th Edition, effective December 31, 2026. This action is necessary to maintain Florida's leadership in electrical safety, align with national standards, and protect the public from preventable electric shock drowning hazards.

Thank you for your consideration and for your continued service to the people of Florida. I stand ready to assist the Commission with any additional information or legislative context that may be helpful.

Sincerely,

A handwritten signature in blue ink, appearing to read "Griff", is positioned above the printed name.

Philip "Griff" Griffitts Jr.
Florida House Representative
District 6

Hello sir Please see my recommendations for (2) glitch changes relating to the 9th edition

Respectfully,

COMMENTS TO THE FLORIDA ELECTRICAL TECHNICAL ADVISORY COMMITTEE

Regarding the Proposed Referenced Standards Glitch Change
9th Edition (2026) Florida Building Code, Electrical

Submitted by

Anthony Solino

Chief Electrical Inspector/Plans Examiner
Martin County Building Department

Disclaimer

These comments are submitted in my individual professional capacity as a State of Florida Licensed Electrical Plans Examiner/Inspector. They are intended to assist the Florida Electrical Technical Advisory Committee in its deliberations and do not necessarily represent the official position or policy of Martin County or the Martin County Building Department.

Introduction

These comments are submitted in response to the proposed Referenced Standards Glitch Change for the 9th Edition (2026) Florida Building Code, Electrical.

During my review of the proposed Glitch Change, I identified concerns regarding both the proposed Referenced Standards language and the proposed amendment to Section 210.8(F) of the National Electrical Code (NFPA 70).

Accordingly, these comments address the following two issues:

- Issue 1 – The proposed Referenced Standards language adopting NFPA 70 "as published September 1, 2022."
- Issue 2 – The proposed amendment to Section 210.8(F).

Issue 1 – Referenced Standards

Administrative and Enforcement Considerations

The proposed language adopting NFPA 70 "as published September 1, 2022" presents significant

practical enforcement challenges.

While the intent appears to be preserving the First Printing of the 2023 National Electrical Code, this approach creates unnecessary administrative complexity.

Since publication of the 2023 National Electrical Code, NFPA has issued Tentative Interim Amendments (TIAs), Errata, and has published the 2026 edition of NFPA 70.

Today, NFPA LiNK and digital versions of the National Electrical Code have become the primary means by which the Code is accessed. Requiring enforcement of the First Printing of the 2023 NEC is impractical and will likely result in inconsistent enforcement throughout Florida.

Historically, Florida has adopted NFPA 70 in its entirety while amending only those individual sections where state-specific modifications were necessary. This approach has provided consistency, simplified code administration, and promoted uniform enforcement throughout the state.

If Florida determines that modifications to Sections 210.8(F), 680.26, or any other provisions are appropriate, those individual sections should be amended directly within the Florida Building Code. The Referenced Standards section should simply reference "NFPA 70-23" without the additional phrase "as published September 1, 2022." This approach preserves Florida's longstanding method of adopting NFPA 70 while clearly identifying the specific state amendments.

This approach would provide greater clarity for code officials, designers, contractors, manufacturers, and the public while avoiding unnecessary enforcement challenges.

Issue 2 – Proposed Amendment to Section 210.8(F)

Public Safety Considerations

The purpose of both the Florida Building Code and the National Electrical Code is the protection of persons and property from hazards associated with the use of electricity.

When evaluating any proposal that modifies a nationally recognized electrical safety requirement, it is important to remember why that requirement was introduced into the Code.

The legislative history of Section 210.8(F) traces back to Public Input 1206 during the development of the 2020 National Electrical Code.

That proposal was prompted, in part, by the tragic electrocution of a 12-year-old child who came into simultaneous contact with an energized residential outdoor air-conditioning condenser and a grounded metal fence.

One preventable fatality is unacceptable. The State of Florida has a longstanding history of leading the nation in building safety and code development. As code officials, we should carefully consider the consequences of reducing an established life safety requirement. If a future loss of life were to occur under circumstances this provision was intended to address, we should ask whether we are prepared to justify that decision.

For that reason, any proposal to amend the personnel protection required by Section 210.8(F) should be supported by clear technical substantiation demonstrating that the proposed amendment maintains an equivalent or greater level of public safety.

Recent advancements in high-frequency and special-purpose GFCI protective devices appear to address many of the operational concerns associated with nuisance tripping that developed following adoption of Section 210.8(F).

Given these technological advancements, the Committee should evaluate whether a Florida-specific amendment to Section 210.8(F) remains necessary while maintaining the level of public safety intended by the National Electrical Code.

Recommendations

1. Remove the phrase "as published September 1, 2022" from the Referenced Standards section. The Florida Building Code should simply reference "NFPA 70-23," consistent with Florida's longstanding practice of adopting NFPA 70 while amending only those individual sections requiring state-specific modification.
2. Evaluate whether the proposed amendment to Section 210.8(F) is supported by sufficient technical substantiation demonstrating that the amendment maintains an equivalent or greater level of public safety.

From: Muayad Tarabain <Muayad.TARABAIN@HydroOne.com>
Sent: Friday, July 24, 2026 4:47 PM
To: Madani, Mo <Mo.Madani@myfloridalicense.com>
Subject: Proposed glitch Code Change: Support for E-Ch. 35 Comment #2

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Hello,

I'm Muayad Tarabain, a professional engineer in the province of Ontario that has worked on investigating & mitigating hundreds of stray/contact voltage complaints for residential and farm properties. I'm also a member of the Section 10 Grounding subcommittee for the Canadian Electrical Code (CSA C22.1).

I wanted to share with you my view and support regarding the subject comment by Doug Dorr in the [Electrical TAC.pdf](#) comments.

I strongly urge you to adopt TIA 23-9 into the Florida Building Code by December 31, 2026. It's the appropriate safe measure that will provide a reasonable level of protection from electrical faults whether they're primary or secondary faults.

Thank you,

Muayad Tarabain, P.Eng

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TAC Recommendation: Not Glitch– Denial – 12-0

Commission Action:

