



**Informal Interpretation Report
Number 6567**



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Section 13-404.AB.2

Question:

Is it the intent of Florida Building Code - Building Section 13-404.AB.2 to require R-19 insulation in a building with exposed ductwork and no ceiling?

Answer

No. Because there is no ceiling, there is no plenum or ceiling cavity. Assuming that the space is not to be vented to the building exterior, both the thermal envelope and the pressure envelope are at the roof level. The R-19 requirement only applies to roofs above plenums.

Commentary:

The minimum roof R-value shall be not less than R-10 for commercial buildings, R-19 for multi-family residential buildings or as determined by the Method A performance calculation.

Notice:

The Building Officials Association of Florida, in cooperation with the Florida Building Commission, the Florida Department of Business & Professional Regulation, ICC, and industry and professional experts offer this interpretation of the Florida Building Code in the interest of consistency in their application statewide. This interpretation is informal, non-binding and subject to acceptance and approval by the local building official.