



**Informal Interpretation Report
Number 7226**



Date June 13, 2014

Edition 2010

Section R101.2 Exception 2

Question:

Is it the intent of R101.2 exception 2 to allow a designer to utilize the FEBC in lieu of the provisions of the FRC thereby making the provisions of R314.3.1 not applicable to a repair or alteration that would occur in accordance with the IEBC?

Answer

This seems to be a glitch in the base code. Looking at the 2009 IRC, these requirements were carried into the FBC-R from the base code, with the minor Florida changes, of course. Looking at the Existing Buildings Volume, smoke alarms are addressed at level 2 and beyond as well as for additions. This wording in both codes and sections R314 of the Residential as well as 704.4.3 and 1004 of the Existing should be harmonized and presented as change to ICC, probably.

Commentary:

In the meantime; Chapter 1 of the Florida Building Code requires that we use the Existing Buildings volume for structures that fit the definition of existing. With this in mind, there is no allowance or reference that permits application of R314.3.1 until the FBC-EB volume refers us to it. While it is recommended an attorney be contacted

for any legal opinion, the interpretation of the Building Official is the governing decision until a ruling, DEC statement, or interpretation is rendered by the Florida Building Commission on this one. Chapter 1 of the FBC-B states the most stringent rule applies, if the BO desires to apply it in that manner. This is not intended to provide legal advice!

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.