



**Informal Interpretation Report
Number 7648**



Date October 06, 2015

Edition 2014

Section 210.52

Question:

Is Declaratory Statement DCA09-DEC351 related to receptacle outlets in sunrooms applicable to the Florida Building Code, 5th Edition (2014)?

Answer

While declaratory statements by Florida Statute are for site specific cases, the AHJ may use a standing dec statement to assist in their interpretation of the code requirements. If the verbiage associated with the DEC statement is unchanged from one Code edition to the next, generally, yes. Please see the attached commentary for a full explanation.

Commentary:

We have reviewed the applicable code provisions and find that although the adopted edition of both the National Electrical Code, NFPA 70-11 (formerly 2008), and the Specifications for Sunrooms, AAMA 2100-11 (formerly 2002), have changed, there are no technical changes to either document that would affect the Declaratory Statement. In addition, the Florida Building Code definitions for the various categories of sunrooms were updated to reflect those of the updated edition of AAMA 2100. The updated definitions of the categories did not contain substantive technical changes that would affect the validity of the Declaratory Statement.

The current edition of the NEC-2011 Article 210.52(A) has not changed from the 2008 Edition of the NEC as it relates to receptacle outlets in sunrooms:

"NEC 2011 Article 210.52(A) General Provisions. In every kitchen, family room, dining room, living room, parlor, library, den, sunroom, bedroom, recreation room, or similar room or area of dwelling units, receptacle outlets shall be installed in accordance with the general provisions specified in 210.52(A)(1) through (A) (3).

The current edition of AAMA 2100-11 has not changed from the previously adopted edition (2002) regarding the requirements for receptacle outlets. The latest edition removes technical provisions related to receptacle outlet spacing and simply references the appropriate section of the NEC. The Exception regarding Category I, II, and III sunrooms did not change:

The definitions of the categories in the Florida Building Code are taken verbatim from AAMA 2100-11 and are updates without substantive technical changes, particularly to Categories I, II, and III. The changes have no impact on the Exception from the requirement for receptacle outlets.

Regarding the administrative provisions of the code upon which the Declaratory Statement was based, the Florida Building Code provisions related to general versus specific code provisions are unchanged (FBC-B 102.1) and the section related to the code versus adopted standards (FBC-B 102.4), while expanded for clarification, remains essentially the same.

In summary, there have been no changes to the technical or administrative provisions addressed by the Declaratory Statement. Stated differently, the basis relied upon by the Florida Building Commission in publishing its opinion has not changed and there should be no reason not to accept the Declaratory Statement as valid under the codes currently in effect. Requiring a builder to resubmit simply because code editions change is a disservice to the public.

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.