**Informal Interpretation Report**
**Number 7803**

**Date** August 05, 2016

**Edition** 2014

**Section** 202

## Question:

Is it the intent of FRC 5th edition definition of habitable space to include a Florida Room as a non-habitable room and therefore creating a change of use when a Florida Room is converted into a living room by virtue of removing or not removing the door that leads to the Florida room?

## Answer

More information may be necessary to provide a complete response, but we will try. "Florida Room" is a non defined term that could mean many different things to different people. Section R301.2.1.1.2 Sunroom design, from the Florida Building Code, Residential volume contains information that is related to this response. Changing a room from non-habitable to habitable is not in itself a change of occupancy,. A screen enclosure or Category I, II, and III are not considered habitable spaces. The key is the fact that they are non-conditioned. Sunrooms rise to Category IV and V when conditioning is added. If converting from non-conditioned to conditioned space, the FBC-EC applies, but this is not a change of occupancy.

## Commentary:

None

**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.