

To: Parties interested in enclosed booths

Subject: Proposed new ICC-ES Acceptance Criteria for Enclosed Booths for Installation Inside New and Existing Buildings, Subject AC519-1020-R2 (CA/MC), and the ICC-ES letter dated August 18, 2020

Framery, the proponent of this proposed new acceptance criteria AC519, supports approval by the ICC-ES Evaluation Committee of the criteria presented with the ICC-ES letter dated August 18, 2020.

Office phone booths and meeting booths are one the most recent innovations in the office furnishings industry. The products are designed to give privacy for occupants within an open office floor plan. However, as a product category, these booths fall in a grey area between office furnishings, electronic appliances and building products. Office furnishings equipped with electronic appliances are typically evaluated by certification bodies accredited by OSHA as Nationally Recognized Testing Laboratories (NRTLs). Specifically, these products are evaluated in accordance with UL962 (Standard for Household and Commercial Furnishings). Framery and other manufacturers have obtained UL 962 certification for office booths. However, UL962 addresses requirements applicable to electrical and commercial furnishings without taking into account provisions related to compliance with the model building codes.

The proposed new acceptance criteria AC 519 limits use to an occupiable space as defined in International Building Code® (IBC). The acceptance criteria also includes requirements for installation and operating instructions, maintenance, identification, interior finishes, floor finishes, occupancy, means of egress, accessibility, ventilation, interior space dimensions, structural, use with sprinkler systems, safety glazing, and upholstered furniture. While many of these requirements are derived from provisions currently in the IBC, some of the proposed requirements were developed based on unique characteristics associated with these innovative products. We understand this is possible based on the provisions described in IBC Section 104.11 for alternative materials, design and methods of construction and equipment.

This acceptance criteria will provide the industry, specifiers (design professionals), installers, customers including property owners, and authorities having jurisdiction (AHJs) with a clear set of requirements. Framery, as the pioneer of the office phone booth and meeting booth industry, believes there is an urgent need for the proposed new acceptance criteria AC519.

In conclusion, the industry has been growing rapidly in the last five years. Over the past ten years, Framery has delivered and installed more than 40,000 products globally and more than 13,000 products in the United States and Canada. Framery products have been installed in buildings located in all fifty states including in major cities such as New York (NY), Los Angeles (CA), San Francisco (CA), Santa Clara (CA), Santa Barbara (CA), Seattle (WA), Plano (TX), Phoenix (AZ), Philadelphia (PA) and Charlottesville (VA). Currently, these products are designed and produced by tens of manufacturers and sold, delivered and installed throughout the United States and Canada. Framery, as the pioneer of the industry, is working with ICC-ES to develop the proposed new acceptance criteria AC519 to move this industry forward. Therefore, we respectfully request that the ICC-ES Evaluation Committee approve the proposed new acceptance criteria AC519 during the hearing scheduled on October 6-7, 2020.

At Tampere, Finland, on 10th of September 2020,



Timo Inkinen

Head of Product Development & Quality

From: Taecker, John K. <John.K.Taecker@ul.com>
Sent: Thursday, September 10, 2020 9:40 PM
To: es
Subject: Written Comments on Proposed New ICC-ES Acceptance Criteria for Enclosed Booths for Installation Inside New and Existing Buildings, Subject AC519-1020-R2 (CA/MC)

Hi, Chris –

The following are comments for the ICC ES Committee to consider for the proposed subject AC 519 at the October 6th meeting.

1. Terminology – the industry that manufacture these types of products use different terms and thresholds than what is used in the proposed AC. “Enclosed booths” are considered as 16 square feet or less, and “room-in-room” is the term used for these types of products that are larger than 16 square feet. Use of established industry terminology for an emerging industry can provide consistency and clarity regarding the use and application of these requirements.
2. Size limitations – consider a size limit for what will be covered by AC519, such as square footage and maximum ceiling height, in order to eliminate any concerns with spanning more than one typical story in height.
3. a. Conditions of Use, Section 6.8(E) – the installation of both smoke detection and annunciation (horn-strobe) should be noted as mandatory when the space in which the Enclosed Booth is installed is protected by a fire alarm system. This should not be at the discretion of the building official.
b. Conditions of Use, Section 6.8(D) – the automatic fire sprinkler protection for an Enclosed Booth, as defined by this proposed AC, should be noted as mandatory when the space in which the Enclosed Booth is installed is protected by an automatic fire sprinkler system and the width of the Enclosed Booth is 4 feet or greater. This should not be at the discretion of the building official.
4. Floors – is a floor required to be part of the Enclosed Booth, or can the Enclosed Booth be permitted to use the floor of the space in which the booth is installed?
5. Informational Sign – besides the operating instructions required in Section 2.1.3, consider also requiring an "Informational Sign" to specify limitations and other safety requirements that must be followed. Operating instructions will probably not be readily available for those that are actually using these booths.
6. UL 325 and UL 864 (Rows 186 thru 189) – it is unclear why UL 864 is referenced as an alternative to power operated doors, considering those products are not covered by the scope of the standard. Also, instead of making UL 325 an exception to BHMA A156.10, consider writing the sentence as:

“Power operated swinging doors, power-operated sliding doors and power operated folding doors shall comply with BHMA A156.10 ~~or Exception: As an alternative to complying with BHMA A156.10, the door operator shall comply with either UL 325 or UL 864.~~”

7. Reference UL 962 – the standard UL 962 should be considered to be referenced in this proposed AC. UL 962 is an ANSI consensus standard. Over the last several years, new requirements have been developed for UL 962 to specifically address these types of products. The inclusion of these new requirements is in the last stages of development, and the new edition of UL 962 is anticipated to be published before the end of this year. This

standard has had input from industry. UL 962 addresses not only the various topics included in the proposed AC, but also includes specific product marking requirements and the applicable electrical requirements.

If there are any questions on these comments, please let me know.

Thank you for the opportunity to comment. I look forward to ICC ES Committee meeting in October.

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