NIST TECHNICAL STUDY OF SOFA SUPER STORE FIRE, October 2010

COMMENTS OF:
THE INTERNATIONAL CODE COUNCIL (ICC)
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The International Code Council (ICC) offers the following comments on the NIST Draft Report on the Technical Study of the Sofa Super Store Fire—South Carolina, June 18, 2007.

The International Code Council (ICC) is a membership association dedicated to building safety, fire prevention, and energy efficiency. The International Codes, or I-Codes, published by ICC, provide minimum safeguards for people at home, at school and in the workplace. Building codes benefit public safety and support the industry's need for one set of codes without regional limitations. The International Code Council also publishes the International Energy Conservation Code (IECC), which is referenced in the Energy Independence and Security Act (EISA) of 2007, and is a national requirement in section 410 of the American Recovery and Reinvestment Act of 2009. Fifty states and the District of Columbia have adopted the I-Codes at the state or jurisdictional level. Federal agencies including the Architect of the Capitol, General Services Administration, National Park Service, Department of State, U.S. Forest Service and the Veterans Administration also enforce the I-Codes for the facilities that they own or manage. The Department of Defense references the International Building Code for constructing military facilities, including those that house U.S. troops, domestically and abroad. Puerto Rico and the U.S. Virgin Islands enforce one or more of the I-Codes.

The International Code Council (ICC) was established in 1994 as a non-profit organization dedicated to developing a single set of comprehensive and coordinated national model construction codes. The founders of the ICC are Building Officials and Code Administrators International, Inc. (BOCA), International Conference of Building Officials (ICBO), and Southern Building Code Congress International, Inc. (SBCCI). Since the early part of the last century, these non-profit organizations developed three separate sets of model codes used throughout the United States. Although regional code development has been effective and responsive to our country's needs, the time came for a single set of codes. The nation's three model code

groups responded by creating the International Code Council and by developing codes without regional limitations; the International Codes.

We begin by congratulating NIST for the thorough investigation and analysis of this tragic fire. The review of all significant contributing factors to the ignition and spread of this fire that lead to the line of duty death of nine firefighters serves as a "lessons learned" document for all current and future firefighters and building and fire inspectors. Understanding of the circumstances that lead to this tragedy, and implementation of the NIST recommendations that are presented as a result of this investigation, will undoubtedly serve to prevent similar occurrences in the future.

The information contained in Chapter 5 of Volume I provides an accurate and concise history on the development and acceptance of model building and fire codes in the United States. We find the information about the ICC as a model code organization and the accompanying historical information about the three legacy model code organizations that merged to become the ICC to be accurate.

In addition, Chapter 5 provides the reader of th

The report Recommendations with respect to <u>Improving Model Standards, Codes and Practices</u> (Section 6.3) and the emphasis that effective code administration is a responsibility of building owners, design professionals and municipal building and fire inspectors is right on point. The first two recommendations clearly explain the importance of adopting and enforcing a correlated model building and fire code and the role all stakeholders play in that process.

In recommendation 3, the report recommends "