



MISSOURI ASSOCIATION OF CODE ADMINISTRATORS



CHARTER CHAPTER 26

202 NW 21 Rd., Warrensburg, Mo. 64093-7901
Ph. 660/422-9226; Fx. 775/640-4069
August 1, 2001

FILED

AUG 6 2001

Dale Hardy Roberts, Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo. 65102

Missouri Public
Service Commission

Re: The following Proposed Amendment to Rules concerning the Code
for Modular Units; to reflect changes in code editions; Case # MX-
2000-443; Rule #CSR 240-123.080

Dear Mr. Roberts:

The Missouri Association of Code Administrators (MACA), BOCA Charter Chapter # 26, representing over 130 jurisdictions in the State of Missouri, has the following comments concerning the above referenced proposed amendment to rules.

Since 2000, there has been only one family of codes published. All three of the major code groups have combined into one family of codes. A large portion of the jurisdictions in the State of Missouri have adopted or are in the process of adopting the new 2000 International Codes. See list attached.

MACA recommends that Section (3) subsection (A) and (B) be combined into one Section (3). Section (3) would read thus:

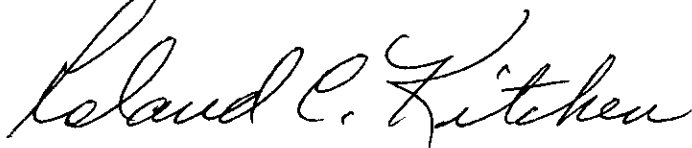
- (3) The structure shall be manufactured in accordance with and meet the requirements of the following International Codes: International Building Code/2000; International Plumbing Code/2000; International Mechanical Code/2000; International Fuel Gas Code/2000, and National Electric Code NFPA 70, 1999.
- (4) All modular units shall comply with the International Energy Conservation Code/2000.

Enclosed find two attachments. One is entitled, "Advantages of the International Codes". The second one is, "What's being said about the 2000 International Codes". You will find endorsements on both pages.

MACA believes it would further simplify the construction industry if all jurisdictions would adopt the International Codes as soon as possible. There would not be the confusion related to jurisdictional and regional differences that now exist.

Therefore, MACA asks the Commission to seriously consider adopting the International Codes as listed above.

Sincerely,

A handwritten signature in cursive script, reading "Roland C. Kitchen". The signature is written in dark ink and is positioned above the printed name and title.

Roland C. Kitchen C.B.O.
1st Vice President

MISSOURI

State of Missouri*
Ballwin*
Bella Villa*
Boone County*
Branson*
Cameron*
Cape Girardeu*
Central Taney County
 Fire Protection
 District*
Columbia
Clinton*
Cuba*
Ellisville*
Excelsior Springs*
Farmington*
Forsyth*
Gladstone*
Grandview*
Green County*
Hannibal*
Herculaneum*
Hollister*
Jefferson City
Jefferson County*
Joplin*
Kimberling
Kirksville
Kirkwood
Lake Winnebago
Macon*
Maryland Heights**
Mexico
Moberly*
Mountain Grove*
New Haven*
Olivette*
Osage Beach*
Pacific*
Peculiar*
Platte City*
Raymore*
Republic*
Rolla*
Sedalia*

Sikeston*
Springfield*
St. Charles County
St. Claire*
St. Louis**
St. Louis County**
St. Peters*
Sullivan*
University City
Warrensburg*
Webster Grove*
Governor's Commission
 for the Review and
 Formulation of Build-
 ing Code Implemen-
 tation recommended
 all jurisdictions adopt
 the *International*
 Plumbing Code and
 the *International*
 Mechanical Code.

Advantages of the International Codes that will benefit your municipality or state

- One set of consistent, comprehensive, correlated and contemporary building code regulations nationwide.
- Designed to work together and provide a natural transition from current, local and regional codes, retaining their best aspects and coordinated to eliminate conflicting provisions.
- User-friendly, uses established formatting found in previous code books.
- Convenient, requires reference to fewer codes by inspectors and contractors.
- Offers ease of adoption through the need for fewer potential amendments by adopting jurisdictions.
- Developed and will be continuously updated through a national governmental consensus process...YOU can be involved.
- Fully endorsed by the American Institute of Architects; National Council of Structural Engineer Associations; National Home Builders Association; National Multi-Housing Home Builders Association; and Federal Emergency Management Agency, among others.
- Will help keep individual states in step with other states with overlapping construction families or construction regulations.
- Eases the burden of code maintenance for local and regional jurisdictions which use amended versions of existing codes.
- Performance-oriented to stimulate economic development through acceptance of innovative design and construction methods...and to encourage new materials and new construction technologies.
- Saves contractors/builders time and money now spent complying with regional codes...one set of consistent building code regulations for contractors/builders working nationally!
- Makes it easier to produce products and services that will be accepted across state boundaries...easier to bid on jobs in other parts of the country...and easier to hire construction personnel or change jobs.
- International Code products, including Code Books, Codes on CD, Code Commentaries, Checklists, Videos and more, currently available from BOCA International.
- Nationwide education and certification programs based on the ICC Codes are currently being offered by BOCA International.
- Nationwide technical support, including code interpretations and plan reviews based on the ICC Codes are currently being offered by BOCA International.
- Evaluation reports of construction products and methods based on the ICC Codes currently available from BOCA Evaluations Services, Inc.

What's being sold about the 2000 International Codes

A single set of model codes is a means of achieving consistent and reasonable approach to code compliance or enforcement and streamlining the building regulatory system. ICC supports the public service objectives of the Get It TOGETHER Coalition, which is entirely consistent with ICC's mission.

—get it TOGETHER coalition

Federal Emergency Management Agency (FEMA) Director James Lee Witt urged states and communities to adopt, and especially enforce, new International Codes. Strong building codes are the foundation of Project Impact: Building Disaster Resistant Communities, FEMA's nationwide initiative to make prevention the focus of emergency management in the United States. Strong building codes are our first line of attack in prevention and code officials are our front-line soldiers in Project Impact. Witt acknowledged the cooperative efforts of BOCA, ICBO and SBCCI in coming together in the public interest to develop a single set of codes.

—Federal Emergency Management Agency (FEMA) Director James Lee Witt

The model code requirements developed by the ICC serve as a safe harbor for compliance with the requirements of the Fair Housing Act.

—Andrew Cuomo, Secretary, U.S. Department of Housing and Urban Development

The new family of ICC codes brings consistency in code enforcement and economies in code enforcement and real estate development. These codes are the only set of model codes specifically written to work together, and as a package they are very responsive to the needs and concerns of multi-family and senior housing industries. NMHC/ASHA/NAA support the adoption and enforcement of three ICC International Codes to provide cost effective, safe, affordable and accessible housing.

—Ron Nickson, Vice President of Building Codes The National Housing Council/
American Seniors Housing Association/National Apartment Association

Contributing years of experience, informed insights and dedication to the public health, safety and welfare, you have made it possible to create a comprehensive set of integrated building codes for the coming century. This singular achievement is a distinguished legacy that will serve future generations of design professionals, owners and the public by bringing order and efficiency to the regulatory process on a global scale.

—Michael Stanton, President, American Institute of Architects, Presidential Citation

In summary, the Missouri Seismic Safety Commission feels that it's important for the citizens of Missouri, that, as a minimum, all new buildings constructed in Missouri be designed and built in accordance with seismic provisions of a code, presumably the International Building Code which will shortly be the standard throughout the country.

—William Durbin, geotechnical engineer, representing the Missouri Seismic Safety Commission,
www.oa.state.mo.us/dc/BCC/Minutes

BOMA International supports the development and implementation of a single set of model building codes, the "International Codes", as a means of achieving more consistent, and more reasonable, regulation of the commercial real estate industry.

—www.boma.org/intcodes.htm

Within a year or two all 50 states and most local city and county building authorities will adopt the new International Building Codes. It's good news for masonry fireplaces and chimneys in several ways.

—Jim Buckley, A Commentary on Clearance-to-Combustibles and Other Issues Relating to
Masonry Fireplaces and Chimneys, www.rumford.com/code/article.html