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**To:** [CBSC@DGS](mailto:CBSC@DGS); [aphillips@asphaltroofing.org](mailto:aphillips@asphaltroofing.org)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Aaron R. Phillips  
**Date:** Wednesday, May 3, 2023 1:26:28 PM

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#### Commenter Contact Information

Name: Aaron R. Phillips

Date: 5/3/2023 12:00:00 AM

Representing: Asphalt Roofing Manufacturers Association (ARMA) Mailing Address Number and

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#### Proposed Building Standard

Title 24 Part #: Part 2.5

Section #: Chapter 3, Section R337.5.1

Proposing State Agency: State Fire Marshal This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):

Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

SFM 03/22, ITEM 3-2

Section R337.5.1 General.

The final phrase of the last sentence in Section R337.5.1 states, "...that is at least Class A rating fire classification." ARMA recommends rewording this phrase to state, "... that meets a Class A fire classification." Doing so will improve clarity and align the language in R337.5.1 with that proposed for CBC Section 705A.2.2 in SFM 02/22, Item 7-2.

This recommendation is based on Health and Safety Code Section 18930(a)(6), with an intent to reduce ambiguous and vague language in the proposal.

9 Point Criteria Info:

18930(a) 6