To: All Concerned Parties

From: Industrialized Buildings Commission

Date: November 14, 1995

Subject: Summary of issues and actions resulting from September 28 and 29 briefing sessions

As a result of the briefing sessions held by the Commission in Harrisburg, Pennsylvania, on September 28 and 29, inspection and evaluation agencies, as well as manufacturers, raised several issues which required action by the Commission. On October 12, 1995, during a regularly scheduled Rules Development Committee (RDC) meeting comprised of state, manufacturers, consumer and private evaluation and inspection agency representatives, the issues were discussed and actions were recommended to the Commission. During its October 13th meeting, the Commission adopted the RDC’s recommendations as submitted.

The following is a summary of those issues and the actions taken:

1. **Formal technical opinions.**
   To ensure that the participating states’ adopted standards, specifications and requirements are interpreted and enforced uniformly, the Commission has amended the Uniform Administrative Procedures (UAP) to include a procedure for issuing *Formal Technical Opinions.* (See Amendment #95-01 for full text.)

2. **Inspection Agency procedures in the compliance assurance manual.**
   The UAP states that an inspection agency must provide the manufacturer with a complete description of its compliance assurance activities to be included in the manufacturer’s compliance assurance manual. The participants could not agree on how extensive these procedures needed to be and what purpose they would serve. During the RDC meeting, it was pointed out that most of these procedures could be obtained by the manufacturer through the contractual relationship it has with its inspection agency. Consequently, the language which required these procedures to be provided to the manufacturer was deleted. (See Amendment #95-02 for full text.)

Currently, the UAP states that industrialized buildings inspector trainees must obtain their industrialized buildings inspectors certifications within two years of their effective date of employment. During the briefing session, the participants pointed out that, under the current requirement, the two-year grace period would start over any time a trainee switched employers. To ensure that the grace period does not exceed two years, the language in the UAP was revised to indicate that the two-year period would begin on the date the Commission designates a person as an industrialized buildings inspector trainee. (See Amendment #95-03 for full text.)

4. **Scope of building systems.**

During the previous RDC meeting, the third party and the manufacturer advisory committees were given the joint task of defining the scope of a building system. In response, the joint committee developed a document that illustrates how a building system for a typical one and two family dwelling ranch subsystem would be used by a manufacturer. This document is being provided for informational purposes for interested inspection and evaluation agencies and manufacturers.

5. **Red tag procedures.**

During the Commission’s briefing session on September 28, 1995, the designated agencies requested that the Commission’s reply to a public comment regarding red-tagging of unapproved floor plans be further clarified. Although the development of the scope of a building system alleviated some of the concerns [see item 4 above], the RDC decided to revise the language in the UAP. (See Amendment #95-04 for full text.)

6. **Readily removable.**

During the Commission’s briefing session on September 28, 1995, the participants agreed that it may be necessary to further define the term readily removable. After reviewing and discussing the specifics of the concerns, the RDC decided that the current requirements adequately addressed the issue.

7. **Submission of Monthly Production Reports indicating no production.**

Currently, the Commission’s Label Control Program procedures require a monthly production report to be submitted even when a manufacturer does not build any IBC certified units for a given month. Some inspection agencies requested that this requirement be revised since there are a number of manufacturers that build IBC labeled units only one or two months out of the year. The Commission agreed to revise the procedures to require a monthly production report only if a manufacturer has unused certification labels. An unused certification label is any label that has been assigned to a manufacturer by an inspection agency and has not been applied to a building. (See Formal Interpretation #95-05 for full text.)
8. **Identification of employees in charge of the compliance assurance program.**

Model Rules and Regulations (MRR), Part V, Section 2(A)(3) states, in part, that employees in charge of the compliance assurance program must be identified, and their training and qualifications specified. During the Commission’s briefing session, the participants could not agree whether this required the employees to be identified by name or by title. After much discussion, the RDC decided to recommend to the Commission that the compliance assurance manual identify by name both the person in charge of the compliance assurance program and the assistant or the second in charge, if there is no assistant. The compliance assurance manual must also indicate the total number of employees in the compliance assurance program and specify their titles and qualifications. (See Formal Interpretation #95-03 for full text.)

9. **P.E. and R.A. seals required on compliance assurance documents.**

During the briefing session, the Commission was made aware that manufacturers and evaluation agencies were not clear regarding which compliance assurance documents submitted to an evaluation agency for review are required to be sealed by Professional Engineers or Registered Architects. To clarify the requirements for sealing of compliance assurance documents, the Commission has issued a formal interpretation (FI #95-03). In summary, documents are not required to be sealed under the UAP or the MRR unless they are structural calculations prepared under the design program by the manufacturer (alternate method). However, the state in which the documents are prepared may have laws, administered and enforced by the State Board of Architects and Professional Engineers, that may require certain plans or structural calculations to be sealed. Additionally, some IBC states that reserve the right to perform plan reviews for particular use groups may require certain documents to be sealed.

10. **Size limitation for documents submitted to the Commission.**

On June 9, 1994, a formal interpretation was issued limiting the size of a document that can be submitted to the Commission. However, the Commission has continued to receive documents in excess of the limitations even though the scale of the designs were such that the documents could have been easily reduced. Therefore, the Commission has decided to reissue the formal interpretation to make the manufacturers aware that a size limitation has been established. (See Formal Interpretation #94-01 for full text.)

11. **Reporting of certification labels for relabeled units.**

The UAP contains a provision that allows certain units to be relabeled with IBC certification labels. It has come to the Commission’s attention that an appropriate form does not exist for an inspection agency to report the assignment and attachment of such labels. Enclosed is a copy of the new form approved by the IBC that should be used any time an inspection agency relabels an existing unit(s). (See Formal Interpretation #95-06 for full text.)
We, ______________ (name of inspection agency), Code # _____ , have relabeled existing units for the following company at the location indicated with IBC certification labels in accordance with the Uniform Administrative Procedures, Part IV, Section 4(A)(7).

**PART I: CORPORATION REQUESTING RE-LABELING**

Corporate Name: 

Mailing Address:  

City:  

State:  

Zip:  

Contact:  

Phone:  

**PART II: LOCATION OF RE-LABELED UNIT(S)**

Street Address:  

City:  

State:  

Zip:  

**PART III: DESCRIPTION OF RE-LABELED UNIT(S)**

<table>
<thead>
<tr>
<th>IBC Label No.</th>
<th>Model No./Size</th>
<th>Existing Label No</th>
<th>Date of Mfr.</th>
<th>Module Number</th>
<th>Use Group</th>
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C **IBC Label No.**: IBC Certification Label number affixed to unit.  

C **Model No./Size**: Model of unit from data plate. If unavailable, nominal size of unit.  

C **Existing Label No.**: If applicable, original state label number attached to unit.  

C **Date of Mfr.**: If available, date of manufacture from data plate.  

C **Module Number**: Module number per total number of modules that make up building (1 of 4, 2 of 4, etc.).  

C **Use Group**: Primary occupancy or use group designation per model building code.  

**PART IV: PAYMENT FOR IBC CERTIFICATION LABELS**

<table>
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<tr>
<th>MODULAR/CLOSED PANEL LABELS</th>
<th>Quantity</th>
<th>Fee</th>
<th>Amount (A)</th>
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<tr>
<td></td>
<td></td>
<td>$53.00</td>
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<table>
<thead>
<tr>
<th>COMPONENT LABELS</th>
<th>Quantity</th>
<th>Fee</th>
<th>Amount (B)</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>$29.00</td>
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Make Checks Payable to:  

INDUSTRIALIZED BUILDINGS COMMISSION  

505 Huntmar Park Drive, Suite 210  
Herndon, VA 20170  

**PART V: INSTRUCTIONS**

Inspection Agency:  

A completed form must be submitted along with payment no later than 30 calendar days after labels have been affixed.  

Complete all parts and make one copy.  

1. Retain copy for your records.  

2. Submit original along with check to:  

INDUSTRIALIZED BUILDINGS COMMISSION  
505 Huntmar Park Drive, Suite 210  
Herndon, VA 20170  

Revised 7/97
INSTRUCTIONS FOR COMPLETING
THE IBC RELABELING REPORT FORM

The form should be completed by the inspection agency and submitted to the Industrialized Buildings Commission within 30 calendar days after the labels have been affixed along with the payment for the labels.

**Corporate Name:** The name of the corporation which requested the units to be relabeled.

**Contact:** The representative of the corporation who has requested the relabeling.

**Mailing Address:** The mailing address of the corporation.

**Location of Units:** The physical location of the unit(s).

**IBC Label Number:** Label number of the IBC certification label assigned/attached to the unit.

**Model Name/Size:** If specified on the existing data plate, the model name of the unit. Otherwise, the nominal size of the unit.

**Old State Label Number:** If applicable, the number of the original state label that was attached to the unit(s).

**Date of Manufacture:** If available, the date the unit was originally manufactured as specified on the existing data plate.

**Module Number:** The module number per the total number of modules that make up the building.

**Use Group:** The primary occupancy or use group designation for the building as defined by the applicable Model Building Code.