STATE BUILDING CODE INTERPRETATION NO. 01-10

State Regulations for Barrier-Free Facilities

SECTION: Section 1105.4.9  Alarms

QUESTION: Section 1105.4.9 specifies that visible alarms be located in “all assembly areas; common-use areas, including toilet rooms and bathing facilities; hallways and lobbies; and hotel guest rooms…” The definition of COMMON USE AREAS in Section 1102 seems to encompass nearly all areas of the building. What is the application of the term common-use areas to the visible alarm requirements? What are examples of rooms or spaces which must have, or may be exempt from having, a visible alarm?

ANSWER: It was not the intent of the code to require visible alarms in all areas of a building. The state code language was based on the ADAAG Section 4.28.1 which reads in part “…visual signal appliances shall be provided…in each of the following areas: rest rooms and any other general usage areas (e.g., meeting rooms), hallways, lobbies and any other area for common use.”

Further clarifications from ADAAG imply that visible alarms would be required in any space where a deaf employee or non-employee might be expected to be alone in that space and not in the company of a hearing person familiar with that space. Such spaces would be as noted in Section 1105.4.9 and in meeting and conference rooms, classrooms, cafeterias, filing and photocopy rooms, employee break rooms, dressing, examination and treatment rooms, and similar spaces that are not used solely as employee work areas (which are covered by ADA Title I). Visible alarms would not be required in non-occupiable spaces such as mechanical, electrical and telephone closets and janitor’s closets that are not common-use areas nor in the exempted areas listed in Section 1105.4.9 Exceptions.

In determining the need to provide visual/visible alarms in spaces which are not common-use areas, the building official should consider the anticipated use of the space, including whether a deaf person (employee or not) could reasonably be expected to be in that space alone and not in the company of a hearing person who is familiar with that space or whether it is an assigned employee work space covered by ADA Title I or otherwise exempt.

See also Interpretation No. 01-09.

SUPERSEDES: Interpretation No. 93-80

REQUESTED BY: SBCC