STATE BUILDING CODE INTERPRETATION NO. I-03-15

February 6, 2015

The following is offered in response to your letter to me dated January 30, 2015, in which you ask for an official interpretation of the 2005 State Building Code referenced standard ICC/ANSI A117.1-2003.

Question: If a 36" high counter is provided for customers to receive goods, pay for goods, sign checks and/or credit card statements etc., does this counter in fact require a surface complying with section 904.4.3 Check Writing Surfaces (34 inches high)?

The typical businesses in question could be a CVS, hair salon, Seven Eleven or another type of convenience store as examples.

Answer: No (based on the typical business examples mentioned above). The subsection that you reference above 904.4.3 Check Writing Surfaces falls under section 904.4 Checkout Aisles. The provisions in this section, according to the ICC/ ANSI Commentary, were written for the standard conveyor belt to bagger type of checkout aisle commonly found in grocery stores. And if (not mandatory) they provided a check writing surface than this surface would have to be within 28" to 34" AFF or they can provide two check writing surfaces, one at a standard height and one at the accessible height.