## STATE BUILDING CODE INTERPRETATION I-19-07

## August 13, 2007

The following is offered in response to your July 27, 2007 letter to me in which you seek an official interpretation of the requirements of Section 1004.9 of the ICC/ANSI A117.1-2003 Standard as it applies to convenience receptacles located above countertops in Type B dwelling units.

**Question:** Is it the intent of the standard to require 34 inch high countertops in Type B kitchens in order to meet the receptacle reach ranges specified in Section 308.3.2 of the referenced standard?

**Answer:** No. Just as you contacted Mr. Martinelli for clarification of this issue, I took the opportunity to contact Kimberly Paarlberg, Accessibility Specialist for the International Code Council, who is the publisher of the ICC/ANSI A117.1-2003 Standard. Ms. Paarlberg stated that she does not believe that it was the intent of the committee to require 34 inch high countertops in Type B units, just as Mr. Martinelli stated to you. Ms. Paarlberg went on to state that a change in this requirement has been approved by committee for the next edition. Based on Mr. Martinelli's and Ms. Paarlberg's intimate involvement with development of the standard and their stated opinion of the intent of the standard, it is my interpretation that 34 inch countertops are not required to meet the receptacle reach ranges in Type B dwelling units. Receptacles located a maximum of 46 inches above the finished floor to any operable or usable part that are over standard 36 inch high countertops meet the intent of the code.