

March 5, 2007

OSHA Docket Office  
Docket No. S-778-B  
Room N-2625  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

**Re: Advance Notice of Proposed Rulemaking, Docket S-778B  
Application of Table 1005.1, entitled “Egress Width Per Occupant Served”, of the  
International Building Code and International Fire Code**

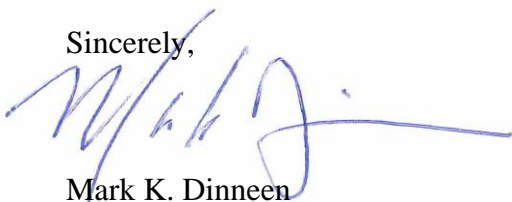
A commentator to this proceeding suggested a concern that Table 1005.1 of the 2003 International Building Code (IBC) and the 2003 International Fire Code (IFC) can be applied to permit construction and maintenance of a less than 28” egress pathway. Such use of this table is impermissible when the table is read and applied, as required, together with the text which introduces and references that table.

The text immediately preceding Table 1005.1, giving instruction to the use of the table, reads as follows (underscored emphasis added):

**1005.1 Minimum required egress width.** The means of egress width shall not be less than required by this section. The total width of means of egress in inches (mm) shall not be less than the total occupant load served by the means of egress multiplied by the factors in Table 1005.1 and not less than specified elsewhere in this code.

The operative language making this interpretation impermissible is **“and not less than specified elsewhere in this code.”** The table is not a stand-alone device for determination of a minimum width. It must be read and used in conjunction with specified minimums for various elements of means of egress as addressed in the provisions of Chapter 10 “Means of Egress” of the IBC and IFC. Proper use of this table creates egress conditions consistent with OSHA’s requirements at §§1910.34, 1910.36, and 1910.37.

Sincerely,



Mark K. Dinneen  
Vice President  
Congressional Relations