



UNITED STATES ACCESS BOARD

1331 F Street, NW
Suite 1000
Washington, DC
20004-1111

Voice
202-272-0080

TTY
202-272-0082

Fax
202-272-0081

Web
www.access-board.gov

May 17, 2011

J. George Sotter, P.E., Ph.D.
President
Sotter Engineering, Consultants
26705 Lorna Verde
Mission Viejo, CA 92691-6055

Dear Mr. Sotter:

Thank you for your letter dated April 20, 2011 following-up to the reply from Nancy Starnes to your March 12, 2011 letter. Ms. Starnes has asked me to respond to your most recent letter. As you may know, the very first accessibility standard developed in the United States, ANSI A117.1-1961 included a requirement that floors be "nonslip". More recent editions of this standard require walking surfaces to be "slip-resistant". Since 1961 no specific values have been established in the ANSI A117.1 to measure slip-resistance. The Access Board's guidelines are based on the 1986 edition of the ANSI A117.1 Standard and are harmonized with the 2003 edition. The International Code Council (ICC) references the 2003 edition in Chapter 11 of the International Building Code (IBC) which is used in all fifty states.

In 1988, prior to the 1991 publication of the Americans with Disabilities Act (ADA) Accessibility Guidelines, the Board funded research that included a limited sample of individuals with mobility impairments. The project attempted to quantify the amount of friction needed by the subjects during walking trials. Based on this research, the Board attempted to clarify the term "slip-resistant" as used in the guidelines and the ANSI A117.1 Standard. As Ms. Starnes mentioned in her previous letter, we did not reference a standard for slip-resistance in our 1991 guidelines. However, we did include a non-mandatory appendix note based on the recommendations in our research project. Later, in the 2004 edition of the Board's guidelines, we rescinded this advisory material. Consistent with that action, we are removing from our website the technical assistance bulletin on ground and floor surfaces that references the 1991 guidelines and its advisory note.

Although we understand that you would like the Board to establish a national standard for slip-resistance, we believe other agencies and organizations are better positioned to address issues pertaining to general public safety. The Access Board is authorized to establish guidelines for accessibility, not public safety. Although our research project suggested that some people with

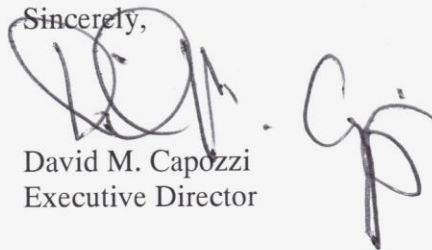
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disabilities may benefit from a higher coefficient of friction than is typically provided, we do not plan to establish criteria based on this study alone. To our knowledge, there have been no further studies pertaining specifically to the needs of individuals with disabilities. You may know that the Occupational Safety and Health Administration (OSHA) issued a Notice of Proposed Rulemaking on May 24, 2010. In part, the rulemaking sought comment on revisions to Subpart D of 29 CFR part 1910, Walking and Working Surfaces. OSHA did not propose that walking surfaces be slip-resistant in accordance with any measurable standard.

We urge you to submit comments to the ICC during their IBC 2012 code development cycle. Costs associated with this process are minimal. Comments can be submitted on-line and commenters need not be present at code development hearings. As Ms. Starnes mentioned in her previous letter, the deadline for code changes is January 3, 2012. Forms and directions are available at <http://www.iccsafe.org/cs/codes/Pages/cycle.aspx>.

If you wish to discuss this matter further, please feel free to contact Marsha Mazz, the Director of the Office of Technical and Information Services at (202) 272-0020 or mazz@access-board.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'DMC', is written over the word 'Sincerely,'. To the right of the signature is a large, stylized handwritten mark that resembles the letters 'CP'.

David M. Capozzi
Executive Director