



PM7-Neltner.doc

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# ICC CODES - PUBLIC COMMENT FORM

FOR PUBLIC COMMENTS ON THE "2008 REPORT OF THE PUBLIC HEARINGS"

PLEASE SEE BACK OF FORM FOR PROCEDURES ON SUBMITTING PUBLIC COMMENTS. ALL SUBMITTALS MUST COMPLY WITH THESE PROCEDURES.

**CLOSING DATE: All Comments Must Be Received by June 9, 2008. The 2008 Final Action Hearings will be held September 17-23, 2008 in Minneapolis, Minnesota**

1) Please type or print clearly: Public comments will be returned if they contain unreadable information.

|                         |  |        |    |         |              |        |
|-------------------------|--|--------|----|---------|--------------|--------|
| Name:                   | Tom Neltner  |        |    |         | Date:        | 6-8-08 |
| Jurisdiction/Company:   | National Center for Healthy Housing and Alliance for Healthy Homes |        |    |         |              |        |
| Submitted on Behalf of: |  |        |    |         |              |        |
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2) Copyright Release: In accordance with Council Policy #28 Code Development, all Code Change Proposals, Floor Modifications and Public Comments are required to include a copyright release. A copy of the copyright release form is included at the end of this form. Please follow the directions on the form. This form as well as an alternative release form can also be downloaded from the ICC website at [www.iccsafe.org](http://www.iccsafe.org). If you have previously executed the copyright release, please check the box below:

2007/2008 Cycle copyright release on file

3) Code Change Proposal Number:

Indicate the Code Change Proposal Number that is being addressed by this Public Comment: PM7-07/08

4) Public Comment: The Final Action requested on this Code Change Proposal is: (Check Box)

Approved as Submitted (AS):
  Approved as Modified by this Public Comment (AMPC):
  Approved as Modified by the Code Committee as Published in the ROH (AM):
  Approved as Modified by Assembly Floor Action as Published in the ROH (AMF):
  Disapproved (D):

5) Proposed Modification (AMPC only):

**505.4 Carbon monoxide alarms.** Every dwelling unit with an attached garage or fuel burning furnace, water heater, or appliance shall ~~install~~ have a carbon monoxide alarm. ~~The alarm should be installed according to the manufacturers instructions.~~

Modification Continued (Attach additional sheets as necessary)

6) Reason (State the reason and justification to support the Public Comment. Include a bibliography of any substantiating material. It is the responsibility of the commenter to make the material available at the Final Action Hearing):

See next page.

Reason Continued (Attach additional sheets as necessary)

PLEASE USE SEPARATE FORM FOR EACH PUBLIC COMMENT  
SUBMITTAL AS A DOCUMENT ATTACHED TO AN EMAIL IS PREFERRED  
SEE BACK OF FORM FOR DIRECTIONS ON WHERE TO SEND PUBLIC COMMENTS

## **Reasons for Proposed Modification**

The proposed modifications address the committee's concerns by replacing the word "install" with "have." The word "install" implied that the alarm needed to be part of construction. Instead, the alarms can be easily added to any home and need to be replaced every few years. They can be plugged into any outlet and do not need to be hard-wired. No structural changes are needed.

This provision will also allow the jurisdiction to align its property maintenance code with state and local laws that require carbon monoxide alarms. Twelve states and more than 100 communities have retroactively required carbon monoxide alarms in existing homes to save lives.

In addition, in rental property the requirement would be self-implementing since most state landlord-tenant laws require compliance with housing and property maintenance codes as a condition of all residential leases.

Carbon monoxide is an odorless, tasteless, invisible gas that kills more than 200 people in homes each year. Thousands more go to the hospital with carbon monoxide poisoning. People in all regions of the country experience carbon monoxide poisoning. After several revisions directed by the Consumer Products Safety Commission, carbon monoxide alarms now reliably and cost effectively warn residents of the presence of life threatening levels of carbon monoxide. The alarms cost about \$25 each.