



Department of Permitting Services
Division of Building Construction
 255 Rockville Pike, 2nd Floor, Rockville, Maryland 20850

CODE INTERPRETATION/POLICY

Code/Year	Section of Code	Title of Code Section/Subsection/Policy
IBC - 2015 Edition	712.1.16	Vertical Openings – Openings otherwise permitted.
<p>Statement/Background of Issue:</p> <p>Section 712 of the 2015 IBC does not recognize the provisions for Communicating Spaces of NFPA 101 (8.6.6 of the 2015 edition), and the inconsistencies between NFPA 101 and the IBC create significant design challenges to protect vertical openings compliant with both codes.</p> <p>Under the 2015 IBC, protection of a vertical opening that connects three contiguous stories would require a shaft, or compliance with the requirements for Atriums which includes smoke management.</p> <p>Under the 2015 NFPA 101, protection of a vertical opening that connects three contiguous stories can additionally be protected as a Communicating Space. The Communicating Space provisions of NFPA 101 are an established method (predating the 1985 Life Safety Code) of protecting vertical openings that connect three or fewer contiguous stories.</p> <p>Division Interpretation/Policy:</p> <p>Compliance with the Communicating Space provisions of 2015 NFPA 101-8.6.6 (as amended by Montgomery County) shall be considered acceptable for compliance with 2015 IBC Section 712 under 712.1.16, Openings otherwise permitted.</p> <p>Application of NFPA 101-8.6.6 for compliance with Section 712 shall be in accordance with the requirements and provisions of the applicable NFPA 101 occupancy classification(s) that is equivalent to the project IBC use group and occupancy classification(s).</p>		
Interpretation/Policy No. BCP 17-01	Date September 19, 2017	Division Chief Steve Thomas 