

E45-21

Proposed Change as Submitted

Proponents: John Woestman, Kellen Company, representing Builders Hardware Manufacturers Assoc. (BHMA)
(jwoestman@kellencompany.com)

2021 International Building Code

Revise as follows:

1010.2.4 Locks and latches. Locks and latches shall be permitted to prevent operation of doors where any of the following exist:

1. Places of detention or restraint.
2. In Group I-1, Condition 2 and Group I-2 occupancies where the clinical needs of persons receiving care require containment or where persons receiving care pose a security threat, provided that all clinical staff can readily unlock doors at all times, and all such locks are keyed to keys carried by all clinical staff at all times or all clinical staff have the codes or other means necessary to operate the locks at all times.
3. In buildings in occupancy Group A having an *occupant load* of 300 or less, Groups B, F, M and S, and in *places of religious worship*, the main ~~door or~~ doors are permitted to be equipped with key-operated locking devices from the egress side provided:
 - 3.1. The doors are the main exterior doors to the building, or the doors are the main doors to the tenant space.
 - ~~3.2.1.~~ The locking device is readily distinguishable as locked.
 - ~~3.3.2.~~ A readily visible durable sign is posted on the egress side on or adjacent to the door stating: THIS DOOR TO REMAIN UNLOCKED WHEN THIS SPACE IS OCCUPIED. The sign shall be in letters 1 inch (25 mm) high on a contrasting background.
 - ~~3.4.3.~~ The use of the key-operated locking device is revocable by the *building official* for due cause.
4. Where egress doors are used in pairs, *approved* automatic flush bolts shall be permitted to be used, provided that the door leaf having the automatic flush bolts does not have a doorknob or surface-mounted hardware.
5. Doors from individual *dwelling* or *sleeping units* of Group R occupancies having an *occupant load* of 10 or less are permitted to be equipped with a night latch, dead bolt or security chain, provided such devices are operable from the inside without the use of a key or tool.
6. *Fire doors* after the minimum elevated temperature has disabled the unlatching mechanism in accordance with *listed fire door* test procedures.
7. Doors serving roofs not intended to be occupied shall be permitted to be locked preventing entry to the building from the roof.
8. Other than egress *courts*, where occupants must egress from an exterior space through the building for *means of egress*, exit access doors shall be permitted to be equipped with an approved locking device where installed and operated in accordance with all of the following:
 - 8.1. The maximum *occupant load* shall be posted where required by Section 1004.9. Such signage shall be permanently affixed inside the building and shall be posted in a conspicuous space near all the exit access doorways.
 - 8.2. A weatherproof telephone or two-way communication system installed in accordance with Sections 1009.8.1 and 1009.8.2 shall be located adjacent to not less than one required exit access door on the exterior side.
 - 8.3. The egress door locking device is readily distinguishable as locked and shall be a key-operated locking device.
 - 8.4. A clear window or glazed door opening, not less than 5 square feet (0.46 m²) in area, shall be provided at each exit access door to determine if there are occupants using the outdoor area.
 - 8.5. A readily visible, durable sign shall be posted on the interior side on or adjacent to each locked required exit access door serving the exterior area stating, "THIS DOOR TO REMAIN UNLOCKED WHEN THE OUTDOOR AREA IS OCCUPIED." The letters on the sign shall be not less than 1 inch (25.4 mm) high on a contrasting background.
 - 8.6. The *occupant load* of the occupied exterior area shall not exceed 300 occupants in accordance with Section 1004.
9. Locking devices are permitted on doors to balconies, decks or other exterior spaces serving individual dwelling or sleeping units.
10. Locking devices are permitted on doors to balconies, decks or other exterior spaces of 250 square feet (23.23 m²) or less serving a private office space.

Reason: What is now Item 3 in 2021 IBC Section 1010.2.4 permits doors to be locked not allowing ingress or egress from certain occupancies while the space is not occupied. Item 3 was revised per proposal E63-12 to recognize the main doors to a space may not be exterior doors – for example doors to a tenant space from an indoor shopping mall corridor. Unfortunately, removing the word “exterior” in what is now Item 3 has resulted in BHMA members seeing interpretations that the “main doors” can be just about any door to a space within a building. Our understanding is that this

broad interpretation and application of the provisions in Item 3 are not as intended with the revisions approved in proposal. This proposal attempts to clarify Item 3 is limited to the main exterior doors a space, or the main doors to the tenant space

Cost Impact: The code change proposal will increase the cost of construction

The code proposal may increase the cost of construction if doors which were capable of being locked with a key-operated lock on the egress side would not be permitted to be locked, and a different, higher cost, lock was needed. On the other hand, this proposal may decrease the cost of construction as the locations where the key cylinder locks may be permitted may decrease slightly.

E45-21

Public Hearing Results

Committee Action:

Disapproved

Committee Reason: The proposal was disapproved. The proposed text as written appears to not be applicable to spaces with one means of egress. There was a question as to if there could be more than one door in the path of egress travel - from the tenant and then again from the building. (Vote: 9-4)

E45-21

Individual Consideration Agenda

Public Comment 1:

IBC: 1010.2.4 (IFC:[BE]1010.2.4)

Proponents: John Woestman, representing Builders Hardware Manufacturers Assoc. (BHMA) (jwoestman@kellencorpany.com) requests As Modified by Public Comment

Modify as follows:

2021 International Building Code

1010.2.4 Locks and latches . Locks and latches shall be permitted to prevent operation of doors where any of the following exist:

1. Places of detention or restraint.
2. In Group I-1, Condition 2 and Group I-2 occupancies where the clinical needs of persons receiving care require containment or where persons receiving care pose a security threat, provided that all clinical staff can readily unlock doors at all times, and all such locks are keyed to keys carried by all clinical staff at all times or all clinical staff have the codes or other means necessary to operate the locks at all times.
3. In buildings in occupancy Group A having an *occupant load* of 300 or less, Groups B, F, M and S, and in *places of religious worship*, the main door or doors are permitted to be equipped with key-operated locking devices from the egress side provided:
 - 3.1. The doors are the main exterior doors to the building, or the doors are the main doors to the tenant space.
 - 3.2. The locking device is readily distinguishable as locked.
 - 3.3. A readily visible durable sign is posted on the egress side on or adjacent to the door stating: THIS DOOR TO REMAIN UNLOCKED WHEN THIS SPACE IS OCCUPIED. The sign shall be in letters 1 inch (25 mm) high on a contrasting background.
 - 3.4. The use of the key-operated locking device is revocable by the *building official* for due cause.
4. Where egress doors are used in pairs, *approved* automatic flush bolts shall be permitted to be used, provided that the door leaf having the automatic flush bolts does not have a doorknob or surface-mounted hardware.
5. Doors from individual *dwelling* or *sleeping units* of Group R occupancies having an *occupant load* of 10 or less are permitted to be equipped with a night latch, dead bolt or security chain, provided such devices are openable from the inside without the use of a key or tool.
6. *Fire doors* after the minimum elevated temperature has disabled the unlatching mechanism in accordance with *listed fire door* test procedures.
7. Doors serving roofs not intended to be occupied shall be permitted to be locked preventing entry to the building from the roof.

8. Other than egress *courts*, where occupants must egress from an exterior space through the building for *means of egress*, exit access doors shall be permitted to be equipped with an approved locking device where installed and operated in accordance with all of the following:
 - 8.1. The maximum *occupant load* shall be posted where required by Section 1004.9. Such signage shall be permanently affixed inside the building and shall be posted in a conspicuous space near all the exit access doorways.
 - 8.2. A weatherproof telephone or two-way communication system installed in accordance with Sections 1009.8.1 and 1009.8.2 shall be located adjacent to not less than one required exit access door on the exterior side.
 - 8.3. The egress door locking device is readily distinguishable as locked and shall be a key-operated locking device.
 - 8.4. A clear window or glazed door opening, not less than 5 square feet (0.46 m²) in area, shall be provided at each exit access door to determine if there are occupants using the outdoor area.
 - 8.5. A readily visible, durable sign shall be posted on the interior side on or adjacent to each locked required exit access door serving the exterior area stating, "THIS DOOR TO REMAIN UNLOCKED WHEN THE OUTDOOR AREA IS OCCUPIED." The letters on the sign shall be not less than 1 inch (25.4 mm) high on a contrasting background.
 - 8.6. The *occupant load* of the occupied exterior area shall not exceed 300 occupants in accordance with Section 1004.
9. Locking devices are permitted on doors to balconies, decks or other exterior spaces serving individual dwelling or sleeping units.
10. Locking devices are permitted on doors to balconies, decks or other exterior spaces of 250 square feet (23.23 m²) or less serving a private office space.

Commenter's Reason: Item 3 in 1010.2.4 permits the main doors of a space to be locked with a key operated lock preventing egress (and ingress) when locked. Traditionally, this provision was applied to the main exterior doors to a business or restaurant, and the main doors would be locked all times other than business hours. Employees of the business or restaurant would know to enter or leave by one of the other doors, or a few employees would have the key needed to unlock the doors for egress.

Prior to the 2015 IBC, the applicability of Item 3 was limited to the **main exterior doors** of a building for the listed occupancies. And, the sign required by this section stated: THIS DOOR TO REMAIN UNLOCKED WHEN **THIS BUILDING** IS OCCUPIED.

However, for the 2015 IBC, proposal E63-12, as modified by the committee, revised item 3 to be applicable to the **main doors** to a space for the same listed occupancies. And, the sign required by this section stated: THIS DOOR TO REMAIN UNLOCKED WHEN **THIS SPACE** IS OCCUPIED. The proponent's intent of E63-12 was to permit the provisions of Item 3 to be applicable to, for example, where the main doors to a restaurant open into a mall.

Unfortunately, over the last several years, we have been observing that Item 3 is being interpreted as broadly as written: any doors that could be described as the main doors, to any space in the listed occupancies, regardless of the size or use of the space and regardless of how far into the bowels of the building, could be locked with a key operated lock preventing ingress **and / or egress**.

This proposal is intended to bring the scope of the applicability of Item 3 to be more closely aligned to the proponents stated intent of E63-12. Item 3 would be applicable to the **main exterior doors to the building**, or the doors are the **main doors to the tenant space**.

Cost Impact: The net effect of the public comment and code change proposal will increase the cost of construction

This code proposal may increase the cost of construction if doors which were capable of being locked with a key-operated lock on the egress side would not be permitted to be locked, and a different, higher cost lock was needed. On the other hand, this proposal may decrease the cost of construction as the locations where the key cylinder locks may be permitted may decrease.

Public Comment# 2793