

## **FAIR BUILDING TECHNOLOGY**

[www.fairbuildingtechnology.com](http://www.fairbuildingtechnology.com)

September 25, 1015

RE: Support for Public Comments to FS 170-15 and FS 171-15 proposals

Dear International Code Commission Voting Representative:

Fair Building Technology LLC (FBT) supports the approval of the referenced proposals as modified by public comments.

For 35 years I have been involved with the development and implementation of fire and life safety requirements in building codes across the United States, inclusive of many building types and below-grade construction conditions that require insulation. In these conditions the position of below-grade insulation between soil and concrete walls or floor slabs is concealed from the sources of fire ignition. The use of fire retardant treatment on this insulation is not necessary.

The below-grade use of foam plastic insulation material results in an efficient, safe installation without compromising fire safety. Accordingly, FBT supports proposals FS 170-15 and FS 171-15. These proposed code changes but would allow a choice of using below-grade foam plastic insulation with or without chemical fire retardants.

We recommend that you cast supporting votes for FS 170-15 and FS 171-15 to reduce exposure to unneeded toxic chemical fire retardants.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Fair", with a long horizontal flourish extending to the right.

Fair Building Technology LLC  
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