
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2018-11-2014 IBC-1003.3.3

Building or Fire Safety Law Interpreted

Section 1003.3.3 of the 2014 Indiana Building Code [675 IAC 13-2.6](#).

Issue

Whether section 1003.3.3 of the 2014 Indiana Building Code (2014 IBC) applies to projections in standard office conference rooms.

Interpretation of the State Building Commissioner

The restriction on projections in section 1003.3.3 of the 2014 IBC applies to all three elements of the **means of egress system** (the exit access, the exit, and the exit discharge), and standard conference rooms are part of the exit access. However, this does not mean that projections over 4 inches are prohibited everywhere. The language in Section 1003.3.3 prohibiting structural elements, fixtures, or furnishings from projecting horizontally "from either side more than 4 inches (102 mm) over any walking surface" is interpreted to apply only to projections of more than 4 inches over either side of the walking surface of the circulation path necessary for egress from the space.

Rationale

The intent of 1003.3.3 is to protect occupants from colliding with projections when they occur in the egress path. This is reflected in the 2014 IBC commentary, which provides as examples only corridors and passageways, and does not refer at all to individual work spaces, including the typical office conference room. While the exclusion of exit access spaces from the commentary's examples does not exclude them from application of the code requirement, it does indicate the focus of the code's attention and intent, which is egress. Not all occupant movement within an exit access is made with the intent of egress from the space.

Additionally, the wording of 1003.3.3 itself is indicative of the intent to apply the restriction in corridor and passageway conditions, rather than in rooms, per se, as it refers to prohibitions on projections "from either side". This indicates to us that it is considering a linear space with only two walls, opposite each other, with a prescribed travel direction along its axis, perpendicular to the direction of any projecting device or equipment – in short, characteristics that aren't always found in the layout of individual work spaces or even small conference rooms, but which are the primary physical characteristics of exit corridors and passageways.

The sole intent of the restrictions on projections is for the safety of those with visual disabilities. Commentary reinforces this, as it discusses the benefits of the restriction only in terms of protection for those who use canes as a navigational aid due to eyesight restrictions. This need for, and type of, protection falls squarely within the handicapped access code in IBC Chapter 11, which in fact has just such a restriction of its own. However, IBC 1103.2.3 states that the end of required accessibility is at the door of the individual office or workstation. Compliant access must be provided to the office, and through its entrance, but not within the office itself.

Finally, research into subsequent editions of the International Building Code show a small but significant change in the language of 1003.3.3, beginning with the 2015 edition. The location of the prohibited projections is no longer described as above the "walking surface", but rather as above the "circulation path". While neither the 2015 nor 2018 model codes are the currently adopted code in Indiana, the change reinforces our belief that a path or aisle used for egress must exist in the space before the prohibition on projections can be applied. Taken in tandem with our thoughts about non-egress movement by occupants of individual offices and small conference rooms, we believe there is a workable solution to be found in applying the prohibition over those circulation paths that are necessary for egress from the space. This would also allow the local official some leeway in application, permitting them to exercise their judgment. Under this application, if the space in question has a viable circulation path that doesn't require travel directly adjacent to the projection in question, that projection would not necessarily result in a violation.

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