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**FIRE PREVENTION AND BUILDING SAFETY COMMISSION**  
**Department of Homeland Security**

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2019-20-2014 IBC-907.5.2.3.1

**Building or Fire Safety Law Interpreted**

**[675 IAC 13-2.6](#) 2014 Indiana Building Code Section 907.5.2.3.1 Public and common areas.** Visible alarm notification appliances shall be provided in public areas and common areas.

**Issue**

Whether areas exterior to the building can be considered "public areas" or "common areas" as they are used in this section.

**Interpretation of the State Building Commissioner**

Yes. Areas exterior to a building can be considered "public areas" or "common areas" under Section 907.5.2.3.1 of the 2014 Indiana Building Code, where visible alarm notification appliances must be provided, if the intended occupants of the exterior area are required to re-enter the building in order to traverse to the public way.

**Rationale**

Section 907.5.2.3.1 is clear in its requirements for visible alarm notification appliances in "public areas" and "common areas". While those specific terms are not defined in the code, the definitions of "common use" and "public use" both refer to exterior conditions as well as interior.

The question in this instance becomes whether the terms are intended to encompass exterior spaces as well as interior, or put another way, whether persons in an exterior space can, under specific circumstances, also need alarm notification.

"Exit discharge" is defined as that portion of a means of egress system between the termination of an exit and a public way. Until an occupant has unencumbered access to the public way, they have not proceeded through the exit discharge and as such we believe they remain occupants of the building. Examples include enclosed exterior courts or occupied rooftops. It would also include an exterior gathering area from which access to the public way is encumbered or prevented, whether by a complete constructed enclosure, or simply a gate that in its design or function does not meet the egress requirements of Chapter 10. In such cases, occupants' immediate awareness of a concurrent fire event can be critical to their decision to act, whether that action is sheltering in place, or re-entering the building to seek exit discharge and escape to the public way.

*Posted: 09/18/2019 by Legislative Services Agency*

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