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

**Written Interpretation Of the State Building Commissioner**

**Interpretation #:** CEB-2021-17-2014 IBC-903.3.1.2.1

**Building or Fire Safety Law Interpreted**

**[675 IAC 13-2.6](#) Indiana Building Code 2014 Edition**

**Section 903.3.1.2.1 Balconies and decks.** Sprinkler protection shall be provided for exterior balconies, decks and ground floor patios of *dwelling units* where the building is of Type V construction, provided there is a roof or deck above. Sidewall sprinklers that are used to protect such areas shall be permitted to be located such that their deflectors are within 1 inch (25 mm) to 6 inches (152 mm) below the structural members and a maximum distance of 14 inches (356 mm) below the deck of the exterior balconies and decks that are constructed of open wood construction.

**Issues**

- (1) Whether the sprinkler protection required by Section 903.3.1.2.1 of the *2014 Indiana Building Code* (IBC) applies to an attached, roofed exterior porch accessed from and associated with a community room in a Class 1, Type V construction, R-2 multifamily structure with an automatic fire suppression system installed throughout in accordance with the 2010 NFPA 13R standard.
- (2) Whether the 2010 NFPA 13R Standard Section 6.6.5 exemption from sprinkler installation in open, attached porches overrides the requirement for balcony, deck and patio sprinkler protection under Section 903.3.1.2.1 of the 2014 IBC.

**Interpretations of the State Building Commissioner**

- (1) The sprinkler protection required by Section 903.3.1.2.1 of the 2014 IBC does not apply to an attached, roofed exterior porch accessed from and associated with a community room in a Class 1, Type V construction, R-2 multifamily structure with an automatic fire suppression system installed throughout in accordance with the 2010 NFPA 13R standard.
- (2) The NFPA 13R exemption for sprinkler protection of open, attached porches does not override the requirements of Section 903.3.1.2.1 of the 2014 IBC.

**Rationale**

On the first issue, the text of Section 903.3.1.2.1 limits its application to only those enumerated exterior spaces that are specifically associated with dwelling units. The term "dwelling unit" is defined in the 2014 IBC:

**DWELLING UNIT.** DWELLING UNIT means any building or portion thereof which contains living facilities, including provisions for sleeping, eating, cooking and sanitation, as required by this code, for not more than one (1) family, or congregate resident for sixteen (16) or fewer persons.

Common-use areas in Class 1 multifamily structures do not meet this definition. Even when they are part of the R occupancy group, they are not themselves *dwelling units*, nor are they portions of dwelling units. Since the requirements of the section in question apply only to specific outdoor areas that are associated with dwelling units, similar spaces associated with common-use areas are not covered by the section.

On the second issue, the code that references adopted standards generally acts as the scoping statement for that standard, and in many cases actively modifies the standard's application and effect. The 2014 IBC references the NFPA 13R Standard, and as such, the standard should be viewed as applicable in the manner and to the extent specified by the IBC. It is this type of modification of the effect of the standard that IBC Section 903.3.1.2.1 does when it requires protection in those specific areas that may otherwise be exempted by NFPA 13R. The published International Code Council commentary on Section 903.3.1.2.1 of the *2012 International Building Code* confirms the intent of the section is to require this additional degree of protection for these spaces.

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