
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2021-14-2014 IBC-1018.1-Exc 1-(RWTC)

Note: For the purpose of making technical corrections, this interpretation replaces LSA Document #21-171.

Building or Fire Safety Law Interpreted
[675 IAC 13-2.6](#) Indiana Building Code, 2014 Edition

Section 1018.1 Construction. *Corridors shall be fire-resistance rated in accordance with Table 1018.1. The corridor walls required to be fire-resistance rated shall comply with Section 708 for fire partitions.*

Exceptions:

1. A fire-resistance rating is not required for corridors in an occupancy in Group E where each room that is used for instruction has at least one door opening directly to the exterior and rooms for assembly purposes have at least one-half of the required means of egress doors opening directly to the exterior. Exterior doors specified in this exception are required to be at ground level.

[Exceptions 2 through 5 omitted for lack of relevance to the request.]

Issue

Whether, for the purposes of applying Exception 1 of Section 1018.1 of the 2014 Indiana Building Code (IBC), a small break room is considered a room used for assembly purposes.

Interpretation of the State Building Commissioner

No, for the purposes of applying Exception 1 of Section 1018.1 of the 2014 IBC, break rooms in general are not considered rooms used for assembly purposes.

Rationale

For an E occupancy structure to be exempted from the requirement for fire-resistance-rated corridors by Exception 1 to Section 1018.1, two conditions must be met: 1) all instructional spaces must have at least one door opening directly to the exterior at ground level, and 2) rooms used for assembly purposes must have at least one-half of their required means of egress doors opening directly to the exterior at ground level. A room used for assembly purposes without a grade-level egress door opening to the exterior of the structure fails to meet that second condition.

The interested person has argued that the break room is considered part of the educational (E) occupancy and is not an assembly (A) occupancy by virtue of Sections 303.1.2 and 303.1.3 of the IBC, and therefore the exterior exit requirement does not apply. While this is an accurate representation of the content of Sections 303.1.2 and 303.1.3, it is irrelevant to the question at hand. Section 1018.1 Exception 1 makes no reference to occupancy classification at all, but rather the purpose or intended use of the space. Even if Sections 303.1.2 and 303.1.3 result in a Group E occupancy classification for assembly spaces rather than Group A, the purpose of the spaces addressed by those regulations remains assembly use, which is all that Section 1018.1 Exception 1 addresses when it refers to "rooms for assembly purposes." This view is reinforced by the ICC commentary to Section 303.1.3, which reads in part, "These assembly spaces, where classified as a portion of the Group E occupancy, are still considered as assembly in nature and must comply with assembly space requirements specified for accessibility and means of egress." Further, if, as the interested person argues, the application of the exception were limited to only those spaces classified as Group A occupancies, then all assembly use spaces, even a large auditorium, would be excused from the exterior exit requirement of the exception, as long as the assembly space in question was associated with an E occupancy. And since the exception in question applies *only* to E occupancies, there would literally never be a scenario in which the assembly space requirement of the exception would be applicable.

Since the text of the exception eliminates actual occupancy group classification as a relevant factor, the only other consideration in this dispute is whether a break room constitutes an intended use that can best be described as "assembly." The term "assembly" is not formally defined in the code, and as such we must turn to the word's standard and customary meaning for us to determine intent in applying the regulation in question.

Merriam-Webster's online dictionary defines "assembly" as "a company of persons gathered for deliberation and legislation, worship or entertainment" (Merriam-Webster, <https://www.merriam-webster.com/dictionary/assembly> last viewed April 13, 2021). While no information is offered in the definition regarding the number of persons

required to make up a "company," the word is unquestionably a collective noun, as it is a practical impossibility for a single individual to assemble. This leads us to examine the way a space is utilized for its intended function, and whether that function can be fully realized by an individual, or if the space must be occupied by more than one person.

While a break room might be sized to accommodate a small group simultaneously, it can still be fully utilized as intended when it is occupied by a single person. This differs from, for example, a meeting room, conference space or an auditorium, which all require more than one occupant for them to be utilized as intended. If the ability of an individual to fully utilize a given space for its intended use is not considered relevant, and a small break room is therefore determined to be an assembly use, then why wouldn't a large toilet room be considered one as well, particularly if it were sized to accommodate even more occupants than the break room? If we can agree that a toilet room is not an assembly use, yet we still wish to consider a small break room as one, we must ask what life safety benefit is served in doing so. In this case, in which the occupants are few (or even just one) in number, and likely to be adults familiar with the building, we cannot see such a benefit.

Posted: 06/16/2021 by Legislative Services Agency

An [html](#) version of this document.