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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2019-32-2012 IPC-420.3

**Building or Fire Safety Law Interpreted**

[675 IAC 16-1.4](#), 2012 Indiana Plumbing Code, Section 420.3

**Issue**

Whether toilet seats in individual R-1 hotel/motel guest bathrooms are required to be open-front in design as designated by code for use in public toilet rooms.

**Interpretation of the State Building Commissioner**

Toilet seats in individual R-1 hotel/motel guest bathrooms are not required to be of open-front design.

**Rationale**

2012 IPC Section 420.3 states that the seats of water closets provided for "public or employee facilities" shall be of open-front design. No other statement about seat design is provided, so we may presume that seats provided in locations other than "public or employee facilities" may be of other designs. Since the bathrooms of individual hotel and motel rooms are clearly not intended to be "employee facilities," the code's provided definition of "public" becomes critical in determining the proper design requirement for these locations. That definition is provided here in its entirety:

**PUBLIC OR PUBLIC UTILIZATION.** In the classification of plumbing fixtures, "public" applies to fixtures in general toilet rooms of schools, gymnasiums, hotels, airports, bus and railroad stations, public buildings, bars, public comfort stations, office buildings, stadiums, stores, restaurants and other installations where a number of fixtures are installed so that their utilization is similarly unrestricted.

The definition above includes the "general toilet rooms" of hotels and motels, among other specifically listed use types. It also adds a final characteristic common to uses considered "public" – where the number of fixtures contributes to the unrestricted use of the facility. In other words, in addition to the intended "general" users, any facility where more than one user of the type of fixture can be accommodated at a single time is also considered "public."<sup>1</sup>

Individual guest room bathrooms do not meet either of these criteria – they are not intended for use as "general toilet rooms" in hotels and motels, nor is their utilization unrestricted by virtue of the presence of multiple fixtures available for simultaneous use at a single point in time. Therefore, they are not considered "public" and their seats are exempt from the open-front design requirement of public fixtures stated in IPC Section 420.3.

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<sup>1</sup> This is also consistent with our prior "public/private" toilet room interpretation, #CEB-2019-06-2012 IPC-202 [[20190410-IR-675190199NRA](#)].

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