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October 19, 2008

Gabriella M. Davis, Secretary  
IAPMO Standards Council  
IAPMO  
5001 E. Philadelphia Street  
Ontario, CA 91761

**Appeal Petition ROP Item # 191, ROC Seq # 85**

Chapter 14, Table 14-1 see ROP page 221, ROC page 220 and Technical Meeting Convention (minutes and actions have not been posted as yet.)

On behalf of myself I speak in favor of retaining the action of the Technical Committee at this past 2008 meeting in Denver, CO. The TC voted to accept the inclusion of the proposed IAPMO IGC's within Chapter 14, Table 14-1 based on the information given in the Comments substantiation. Additionally I would like to point out that I recently proposed the inclusion of IAPMO IGC 161-2007 Waterless Urinals to the National Standard Plumbing Code process that was not accepted. One of the reasons for not accepting the IGC was "IAPMO does not list any of their own IGCs in the UNIFORM PLUMBING CODE™(UPC™)." The criteria also was not accepted because of a procedural and content problem.

These criteria should be listed in Table 14-1 so that the various testing and listing agencies have criteria on which to base the testing of products that are currently manufactured and installed within many plumbing installations in this country and around the world. By having the criteria listed in Table 14-1 and the listing of the products the Authority Having Jurisdiction called upon to consider and approve products or materials for installation in their jurisdiction will now have a criteria to base their decision. Additionally when the criteria is listed in Table 14-1 it is more likely to be accepted by other codes as other standards and criteria that are developed by ASSE and other recognized standards developers.

I have made this request to retain the action of the TC at their meeting because at the 2008 Technical Meeting Convention the membership voted to overturn the TC action and to remove the IGC's from the 2009 edition of the code. Additionally since the final actions of the membership and the TC voting on the memberships action have not been published I feel it is important at this time to make my comments known should the memberships action move forward.

The only person or persons that I think might be materially affected by any change in this code section language would be the manufacturers of products addressed in these IGC's. Additionally if a jurisdiction has adopted this new proposal before it has been officially adopted in its final form by the Standards Council and published.

Thank you for your consideration in this matter and should you have any questions please contact me.

Signed,

John M. Halliwill, REHS  
Principal

**Attachments:** None