

June 6, 2008

International Code Council
IMC Birmingham District Office
IRC Attn: Annette Sundberg
900 Montclair Road
Birmingham, AL 35213-1206

Re: Proposed Changes to the International Code Council's (ICC) International Residential Code (IRC) -
RB57-07/08 R311.6.1

Dear Ms. Sundberg:

On behalf of the American Occupational Therapy Association, Inc. (AOTA), which represents the professional interests of more than 38,000 occupational therapists and occupational therapy assistants throughout the United States, we are writing to submit comments on proposed changes to the International Code Council's (ICC) International Residential Code (IRC), specifically the changes to RB57-07/08 R311.6.1.

The acceptance of a 1:8 slope instead of the previous 1:12 slope for ramps in private homes may present problems not apparent to the owner who is able bodied. However, since anyone can sustain a temporary or permanent injury or illness during their lives, safe access to all environments, especially those with ramps must be considered. Here are some collective comments from our knowledgeable members who are working with people who may or may not use wheelchairs and walkers.

"The proposed change in slope could also lead to runaway or tipped power mobility devices. The specs for power chairs and scooters usually state a maximum incline of 8.7% for safe operation. Steeper inclines pose the risk of tipping (either forward or backward). The braking mechanism may also be inadequate on steeper slopes. I've also seen some homemade ramps with a 1:8 ratio where the power wheelchair or scooter did not make it up the ramp, even at full power."

AOTA recommends that when the construction of a 1:12 (8.3%) or better slope is feasible in any residential setting, the ramp must be constructed no steeper than 1:12. When not feasible due to site constraints that are unsolvable, only then would a steeper slope be allowed up to a maximum slope of 1:8. For most people a 1:8 (12.5%) slope is too steep and unsafe for walking or pushing a baby carriage, as well as propelling a wheelchair due to the greater risk of tipping or destabilizing the movement of the wheelchair.

AOTA requests that due consideration be given to this request. Should you have any questions or comments, please contact AOTA Staff member Chuck Willmarth at (301) 652-6611 extension 2019 or via email at cwillmarth@aota.org.

Sincerely,



Penny Moyers Cleveland, EdD, OTR/L, BCMH, FAOTA
President
American Occupational Therapy Association

Shoshana Shamberg, OTR/L, MS
AOTA Representative
to ANSI 117.2 Committee