

To Whom It May Concern:

I was just made aware of the petition concerning this matter today and I have only just become aware that the comment period has expired. Nonetheless, I hope that you will see fit to include my comments and to consider them.

As an architect who is often asked to review plans of new buildings or to survey an existing site or facility for compliance with the Accessibility Standards of the ADA, I occasionally have to consider automatic doors or power assisted doors where the referenced standard is either ANSI/BHMA A156.10-1999 or ANSI/BHMA A156.19-1997 or ANSI/BHMA A156.19-2002. Other referenced standards that relate to accessibility include ASME standards (for vertical transport), ASTM standards (generally related to material testing and the suitability of materials for access by the disabled), ICC/IBC (International Building Codes), and NFPA (the National Fire Alarm Code).

It is not uncommon for architects to have the IBC and NFPA code documents in their libraries. It is very unusual, however, for architects to spend the money to procure the other referenced standards and their updates and revisions given that they play such a relatively minor role in the practice of architecture. The ANSI/BHMA, ASME and ASTM standards apply more broadly to manufacturing of certain products and the details of these standards are frequently of little or no value to an architect in the course of designing a building. It is for that reason that we do not feel that it is fair to be burdened with the purchase of those standards, their supplements and updates, and it is for that reason that we do not generally believe that those particular publications are "reasonably available."

Architects, who have a critical role in the design of many types of facilities, are nonetheless a relatively small "class of persons affected" by the requirements of the ADA Standards with respect to the referenced standards. There are many more building owners, building managers, interested citizens and affected citizens who may have a covered disability and who may need only one-time access to those referenced standards. But whether the need for access to those standards is infrequent or not, should the 2010 ADA Standards, which are reasonably and readily available, direct an interested party to a publication which is clearly NOT reasonably or readily available? I think not and there are many other architects and other citizens who feel likewise.

Since the portions of the referenced standards that I mention in paragraph two above --- the standards and codes that are not usually to be found in architects' offices --- that actually apply to accessibility by disabled individuals, are generally a small portion of the whole document, why could not those sections be made available to the public electronically in the same way that the Federal Register and the 2010 ADA Standards are available?

Thank you for your consideration.

**Jim**

**James B. Pettit, Jr., AIA, CSI**  
Senior Associate

**Penza Bailey Architects, Inc.**  
401 Woodbourne Avenue

Baltimore, Maryland 21212  
410.435.6677 extension 118  
410.435.6868 Fax  
410.908.1716 Cell  
<http://www.PenzaBailey.com>