
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2021-30-2014 IMC-603.18

Building or Fire Safety Law Interpreted

[675 IAC 18-1.6](#) 2014 Indiana Mechanical Code, Section 603.18 Registers, grilles and diffusers. Duct registers, grilles and diffusers shall be installed in accordance with the manufacturer's installation instructions. Volume dampers or other means of supply air adjustment shall be provided in the branch ducts or at each individual register, grille or diffuser. Each volume damper or other means of supply air adjustment used in balancing shall be provided with access.

Issue

Does a remote damper control device located below a fixed, permanent ceiling assembly satisfy the access requirement for an above-ceiling supply-air adjustment device under Section 603.18 of the *2014 Indiana Mechanical Code* (IMC)?

Interpretation of the State Building Commissioner

No, a remote damper control device below a fixed, permanent ceiling assembly does not satisfy the access requirement for an above-ceiling supply-air adjustment device under Section 603.18 of the *2014 IMC*.

Rationale

The code requirement in this case is straight-forward. Section 603.18 says each device used for air supply adjustment must be provided access; it does not elaborate why such access is required, and it would be an error to assume it is solely for the purpose of operation and adjustment of the device. There are other reasons access is required. International Code Council published commentary on the *IMC* definition of "access" discusses these additional needs, and summarizes them as follows (emphasis added):

Access can be described as the capability of being reached or approached for the purpose of *inspection, observation, maintenance, adjustment, repair or replacement*.

A remote operating device may provide adjustment successfully, but alone it does not provide the ability to inspect, observe, maintain, repair or replace the supply-air adjustment device. Therefore, it is not an acceptable substitute for code-required access.

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