

# Public Comments Report: Formal Actions on all Public Comments and Committee Comments

November 30, 2020

## Foreword

This document is the **Public Comments Report** (PCR). The contents of this document fulfill the reporting requirements for documenting final committee actions on public comments and committee comments on the development of the 2020 edition of ANSI Z765 Square Footage: Method for Calculating. It summarizes the steps of the Public Comment phase of the development process and the Ballot Comment consideration process, including the development of the Second Draft Standard for the purpose of receiving public comments on the changes made to the First Draft Standard.

The roster of the Consensus Committee at the time of voting on comments is provided. This document is released as information to the Consensus Committee and public as to the Formal Action taken on the comments.

Prior to the Public Comments phase of development, the Consensus Committee took action on Proposed Changes submitted by the Public and on Committee Proposals. This work on the development of the 2020 edition of ANSI Z765 Square Footage: Method for Calculating is reported in the Public Proposals Report (PPR) and the First Draft Standard that were released to the public on February 7, 2020. Both documents and all other relevant records, including this report, are posted at [www.homeinnovation.com/Z765](http://www.homeinnovation.com/Z765).

A formal “Call for Public Comment” on the First Draft Standard was released on February 7, 2020. The call was posted in the February 7, 2020 edition of the ANSI Standards Action (Vol. 51, #6) and announced via a Home Innovation Press Release (February 18, 2020). The 45-day period for submitting Public Comments closed on March 23, 2020.

After the close of the “Call for Public Comment”, all comments were grouped for review to assist the Consensus Committee in taking Formal Action on all comments.

On July 22, 2020 a public hearing was held via a Zoom Teleconference. The Consensus Committee heard public testimony, reviewed the Public Comments, and took Formal Action on each Public Comment.

The Second Draft Standard was published and a formal “Call for Public Comment” on the Second Draft Standard occurred on October 9, 2020. The call was posted in the October 9, 2020 edition of the ANSI Standards Action (Vol. 51, #41) and announced via a Home Innovation Press Release (October 9, 2020). The 30-day period for submitting Public Comments closed on November 8, 2020 for the Second Draft Standard.

Concurrent with the public comment period, a Ballot Period on the Formal Actions taken at the February meeting of the Consensus Committee started on August 24, 2020 and was extended to November 27, 2018. After the close of the “Call for Public Comment” on the Second Draft Standard, all public comments on the Second Draft Standard were circulated to the Consensus Committee, for a period of ten calendar days, on November 17, 2020. All Committee Actions taken at the July 22, 2020 public teleconference were upheld through the ballot and the circulation ballot.

The following information is included on each comment considered by the Consensus Committee:

- (1) The name of the submitter of the comment;
- (2) The entity represented;
- (3) The text of the comment;
- (4) The Formal Action taken by the Consensus Committee;
- (5) Any Consensus Committee statement on the Formal Action;
- (6) Number of Consensus Committee members eligible to vote;
- (7) Number voting in the affirmative;
- (8) Identification of negative voters and stated reasons for each negative vote;

- (9) Identification of those who have abstained, and reasons for each abstention;
- (10) Identification of those who have not returned ballots.

**Held Comments.** In accordance with the development procedures, one Public Comments was classified as “Held”. Public Comments were only allowed on the changes shown in the First Draft Standard or the Second Draft Standard (changes shown in legislative format). Public Comments on a section or parts of a section that were not changed were designated as Held. The one Held comment is reported at the end of this document. The release of this report is considered notification to a submitter of a Held comment. At the discretion of the submitter, a Held comment can be retained and be processed as a proposed change during the next revision of the standard. The submitter must inform the Home Innovation Research Labs Standards Coordinator of this request or the comment is considered discharged.

**Notification of Committee Action.** The release of this report is considered notification to a submitter of a public comment or a ballot comment as to the committee action on the comment. The submitter of a public comment may inform the Standards Coordinator that they remain unresolved by the action of the Consensus Committee. For the submitter of a negative ballot comment, only those items on which the member indicates to the Standards Coordinator that his or her objection is resolved are classified as a resolved objection. (Please see “Classification as an Unresolved Objection” below.)

**Objections.** The consideration of public comments in accordance with Section 4.4.5.7 and Section 4.4.6.8, and related ballot comments in accordance with Section 4.4.5.10 of the Home Innovation Research Labs’ development procedures is considered an effort and attempt to resolve all expressed objections. The committee action and statement (reason) supporting the Formal Action reported in this document is notification to the submitter of a comment as to the reason for acceptance or rejection of the comment. Those comments that are not supported by an affirmative action on the part of the Consensus Committee are considered non-persuasive.

**Resolution of Objections.** The consideration of public comments and ballot comments in accordance with Sections 4.4.5.1 and 4.4.6.1 is considered an effort and attempt to resolve all expressed objections. As noted in Section 4.4.7.3, the committee action and statement (reason) supporting the Formal Action reported in a PCR in accordance with Section 4.4.7.2 is notification to the submitter of a public comment as to the reason for acceptance or rejection of the comment. Those comments that are not supported by an affirmative action on the part of the Consensus Committee are considered non-persuasive.

**Classification as an Unresolved Objection.** Unresolved objections as classified as follows:

(a) **Public Comments:** For submitters of public comments, only an appeal filed on a specific substantive change or committee action is tentatively classified as an unresolved objection; or notification from the submitter of a public comment that they remain unresolved by the action of a Consensus Committee is classified as an unresolved objection.

(b) **Ballot Comments:** For negative ballots cast by a Consensus Committee member, only those items on which the member indicates to the Standards Coordinator that his or her objection is resolved are classified as a resolved objection.

Unless otherwise indicated, those committee members who submitted a negative ballot vote on a specific Public Comment remain unresolved by the action of the Consensus Committee.

**Appeals.** Persons who have directly and materially affected interests and who have been or will be adversely affected by any procedural action or inaction by the Secretariat with regard to the development of a proposed standard or the revision, reaffirmation or withdrawal of an existing standard, have the right to appeal. Appeals shall be based on compliance with or interpretation of the Home Innovation Research Labs’ Procedures. An appeal shall be submitted by registered mail to the Standards Coordinator and shall be received no later than December

30, 2020. The appeal shall identify and address the original source of the objection. The appeal shall specify the cause of the appeal, the applicable section(s) of the procedures related to the appeal, and a proposed corrective action. The appeal shall be accompanied by a filing fee of \$500.00. This fee may be waived or reduced upon sufficient evidence of hardship. Appeals will be considered by the Appeals Panel at a hearing on the premises of the Home Innovation Research Labs. The appeals hearings are planned for the week of January 19, 2020 (the dates are subject to change and appellants will be notified of the specific date and time). Please see the Home Innovation Research Labs' development Procedures for further information on appeals.

Address:

Standards Coordinator  
Home Innovation Research Labs  
400 Prince George's BLVD Upper Marlboro, MD 20774

**Home Innovation Research Labs' Procedures.** A copy of the Home Innovation Research Labs' ANSI-accredited development "Procedures for Consensus Developed Standards", and all other information on the development of the 2020 ICC 700 - National Green Building Standards is available at <http://www.homeinnovation.com/NGBS>.

## Committee Roster

### **2D Homes (P)**

Primary Rep: Victor Drozd

### **BM Appraisals (U)**

Primary Rep: Byron Miller

### **City of Winter Park, Florida (G)**

Primary Rep: Kristopher Stenger

### **Consumer Reports (G)**

Primary Rep: Jim Nanni

### **Freitag Appraisals & Consulting (U)**

Primary Rep: Mark Freitag

### **J. Wright Building Company (P)**

Primary Rep: Jeremy Wright

### **Meritage Homes (P)**

Primary Rep: Brian Juedes

### **Mississippi Coalition of Appraisers (U)**

Primary Rep: Jean McCarty

### **Myers Law, LLC (G)**

Primary Rep: Daniel Myers

### **National Association of Home Builders (P)**

Primary Rep: Cesar Lujan

### **Reynolds & Associates (U)**

Primary Rep: Bryan Reynolds

### **Tekboys (U)**

Primary Rep: Darwin Ernst

### **W.M. Foley Construction Corp. (P)**

Primary Rep: Wayne Foley

<b>Total</b>	<b>13</b>
General	3
Producer	5
User	5

## Summary of Public Comments on First Draft Standard

Item #	Section	Committee Action Ballot II
PC 01	Section 2.2 Finished Area	Disapprove (12-0-0)
PC 02	Section 2.2 Finished Area	Approve as Modified (12-0-0)
PC 03	Section 2.2 Finished Area	Disapprove (12-0-0)
PC 04	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 05	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 06	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 07	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 08	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 09	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 10	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 11	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 12	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 13	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 14	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 15	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 16	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 17	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 18	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 19	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 20	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 21	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 22	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 23	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 24	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 25	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 26	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 27	Section 4.3 Areas Not Considered Finished Square Footage	Disapprove (12-0-0)
PC 28	Section 4.3 Areas Not Considered Finished Square Footage	Disapprove (12-0-0)
PC 29	Commentary – Finished Stairs	Approve (11-1-0)
PC 30	Commentary – Staircases	Disapprove (12-0-0)
PC 31	Commentary – Staircase and Elevator	Disapprove (12-0-0)
PC 32	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 33	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 34	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 35	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 36	Section 3.2 Attached Single-Family Finished Square Footage	Disapprove (11-1-0)
PC 37	Section 3.2 Square Footage – Attached Single-Family Finished Square Footage	Disapprove (11-1-0)
PC 38	Section 3.4 Openings to the Floor Below	Disapprove (11-1-0)
PC 39	Section 3.7 Finished Areas Connected to the House	Disapprove (12-0-0)
PC 40	Section 3.6 Ceiling Height Requirements, Figure 5	Disapprove (12-0-0)
PC 41	Section 3.6 Ceiling Height Requirements, Figure 5	Approve as Modified (12-0-0)
PC 42	Commentary – Flooring Requirements	Non-Responsive
PC 43	Section 4. Statement of Finished Square Footage	Non-Responsive
PC 44	Section 4. Statement of Finished Square Footage	Non-Responsive

### Summary of Public Comments on Second Draft Standard

Item #	Section	Associated PC
PC 100	Section 2.2 Finished Area	PC 02
PC 101	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 102	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 103	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 104	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 105	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 106	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 107	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 108	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 109	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 110	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 111	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 112	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41
PC 113	Section 3.6 Ceiling Height Requirements, Figure 5	PC 41

### Held Comments on Second Draft Standard

Item #	Section	Associated PC
PC 114	Section 3. Calculation of Square Footage	N/A

## Public Comments on First Draft Standard

PC 01 – Section 2.2 Finished Area		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Steve Kahane, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	An enclosed area in a house that is suitable for year-round use based upon its location, embodying walls, floors, and ceilings that conform to or exceed in quality, utility and climate control (HVAC) to the remainder of the house, regardless of use.	
<b>Reason:</b>	In the public comments, there were concerns about the use of the room (closets, walk-in refrigerators, laundry) in determination of GLA. There was also discussion about the need for permanent heating or cooling per locale. One commenter asked if closets on a 2nd story knee wall were included. We wouldn't consider excluding closets on the 1st floor, why would we on the second? While a walk-in freezer is not living area, neither is the space taken up by a standard refrigerator and we wouldn't consider removing that area. Lastly regarding HVAC. If the space meets the criteria, it is gla, regardless of use. Climate control is a measure of conformity, quality and utility. As long as it meets or exceeds that of the remainder of the house it should be included, assuming all other criteria are met.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	Location is referring to geographical location, not location within the house.	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 02 – Section 2.2 Finished Area		<i>Final Formal Action: Approve as Modified</i>
<b>Submitter:</b>	Tom Blankenship, Steve Gregory Appraisals	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	An enclosed area in a house that is suitable for year-round use based upon its <u>geographic region or location within the country</u> , embodying walls, floors, and ceilings that are similar to the rest of the house.	
<b>Reason:</b>	Provides clarification as to what "location" refers.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Approve as Modified	
<b>Modification of Comment:</b>	An enclosed area in a house that is suitable for year-round use based upon its <u>geographic region</u> <del>location</del> , embodying walls, floors, and ceilings that are similar to the rest of the house.	
<b>CC Reason:</b>	Clarification.	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0	



Non-Voting:	1
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PC 03 – Section 2.2 Finished Area		Final Formal Action: Disapprove
<b>Submitter:</b>	Melissa Bond, Self	
<b>Requested Action:</b>	Delete without substitution	
<b>Proposed Change:</b>	<b>Staff Note:</b> Reverses previously approved change, Log 02. <del>based on its location-</del>	
<b>Reason:</b>	By adding the words "based on its location" you have added a tremendous layer of confusion. The definition is clearly understood exactly as it is written. What exactly does "based on its location" mean... in Gross Living Area?, in Gross Building Area?, location on the site?, location in the region of the country?. Please reconsider adding this ambiguous phrase. I am a Continuing Education Provider in multiple states (on-site) and across the country (online) and I can see the plethora of questions that this very unnecessary phrase will cause. Either fully clarify what "based on its location" means or, even better, strike it from the new edition.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 02.	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 04 – Section 3.6 Ceiling Height Requirements, Figure 5		Final Formal Action: Disapprove
<b>Submitter:</b>	Robert N. Mossuto Jr	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	<p>I am not revising the ceiling height section of ANSI; but am providing some critical thought as to the usefulness of this document from an appraiser's view when considering upper floor living space.</p> <p>There are millions of homes across this country that were built before international building code development and acceptance of international building code by the US, individual states, and municipalities within individual states in the US.</p> <p>A large number of homes built with second floors in the US have fully finished second floors with bedroom and bathrooms in which no part of the 2<sup>nd</sup> floor ceiling is 7 feet from floor to ceiling!</p> <p>So, in essence, ANSI is telling Real Estate Agents, Appraisers, Lenders, and the Consumer that that 500, 600, 700, 800 or more square feet and those 2, 3, and 4 bedrooms and many times a bathroom or half bath are all nonexistent in millions of homes across the country if we rely on ANZI standards!</p> <p>As an example, a home built in 1915 with 1,650 square feet of living space is listed and sold. The home has 4 bedrooms and 2 bathrooms. But, 3 of the bedrooms and 1 of the bathrooms are on the 650 square foot second floor. And the max ceiling height of the 2<sup>nd</sup> floor is 6 feet. So, by ANZI standards, the home is a 1,000 square foot (40% smaller), 1-bedroom, 1-bathroom home!</p>	

	<p>An appraisal report indicating the smaller scenario would definingly confuse the consumer, tick the real estate agent off, and likely guarantee the appraiser would not get further business form the lender.</p> <p>So why would any of us rely on ANZI standards when listing, selling, appraising, or lending on the millions of homes that fall under this category? In my opinion, this standard kind of defeats the purpose of having a standard at all.</p> <p>Someone needs to rethink this one!</p>										
<b>Reason:</b>	The ceiling height of 7 feet excludes living area, bedrooms, and bathrooms in literally millions of homes across the united states and does not reflect market reaction. It is a poor standard and one that will confuse consumers, kill sales transactions, and cause significant issues in appraisal reporting. Given this, appraisers would not use ANZI standards when appraising one of these millions of homes. So what is the point of having a standard! You need to rethink this!										
<b>Substantiating Documents:</b>											
<b>CC Action:</b>	Disapprove										
<b>Modification of Comment:</b>											
<b>CC Reason:</b>	In favor of action on PC 41										
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>	Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13										
Agree with Committee Action:	12										
Disagree with Committee Action:	0										
Abstain:	0										
Non-Voting:	1										

<b>PC 05 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>										
<b>Submitter:</b>	Darval Rash, SRA, Self											
<b>Requested Action:</b>	Revise as follows											
<b>Proposed Change:</b>	<p>Include all stud walls for finished one half story living areas</p> <p>The proposal for a single wall does not make sense due to cost associated with <u>all walls and does not reflect the inclusion of dormers</u></p>											
<b>Reason:</b>	Construction cost all knee walls and dormers											
<b>Substantiating Documents:</b>												
<b>CC Action:</b>	Disapprove											
<b>Modification of Comment:</b>												
<b>CC Reason:</b>	In favor of action on PC 41											
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13											
Agree with Committee Action:	12											
Disagree with Committee Action:	0											
Abstain:	0											
Non-Voting:	1											

PC 06 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	James Hollenberg, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	There needs to be some clarification on Measuring upper levels with sloped ceilings. This section on page 10 of the draft is slightly confusing. It will become more confusing since it appears by the diagrams that we measure one outside wall and not the other. Typically if the outside wall goes to the outside and not an attic or open space I measure like the main level to the outside wall but if it goes to an open space in the attic I would only measure to the inside wall.	
<b>Reason:</b>	This needs verbiage to explain the diagram and the measurements of second levels. Just like the verbiage that states only measure at the 5 foot level and the that half the are must be 7 feet height.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 07 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Patricia K Fogle, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	Very confusing, adding for exterior wall on one side of sloped ceiling! Need to either add for both or not add at all.	
<b>Reason:</b>	Very confusing.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 08 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Calvin Nay, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	Sketch of level with sloped roof seems to indicate that one wall is to be included in the GLA at the 5' level This will increase confusion among appraisers	

<b>Reason:</b>	Either add the both imaginary wall thickness or don't add EITHER wall thickness. Add a clarifying statement that clearly indicates what the standard is. Please do not confuse the issue further by adding the thickness of one wall to this measurement.
<b>Substantiating Documents:</b>	
<b>CC Action:</b>	Disapprove
<b>Modification of Comment:</b>	
<b>CC Reason:</b>	In favor of action on PC 41
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1

<b>PC 09 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Patrick Williams, Williams Appraisal, Inc	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	For a level that extends below a 5' ceiling height, only measure to the 5' line, do NOT include any sidewalls measurements.	
<b>Reason:</b>	Sidewall dimensions can vary greatly. Including only one sidewall does not make sense, so why do it.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

<b>PC 10 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Desirae P Gartman, Self	
<b>Requested Action:</b>	Delete without substitution	
<b>Proposed Change:</b>	I am a residential appraiser. I feel that the change would create more confusion. I think that the standard should clearly state that either the studs are counted on both walls or neither wall. One wall is confusing.	
<b>Reason:</b>	I think that this change would cause more inconsistencies between appraisers' measurements of similar properties.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		

<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote:	13
	Agree with Committee Action:	12
	Disagree with Committee Action:	0
	Abstain:	0
	Non-Voting:	1

<b>PC 11 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Brad Bassi, SRA, Self	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	I don't understand the sketch on the left under new figure 5 and why only one exterior stud wall is included. This current configuration will lead to a significant amount of confusion and interpretation. I understand right sketch due to wall and slope of ceiling. Left sketch is confusing and I don't understand the need for just one wall.	
<b>Reason:</b>	I am appraising and this revision will lead to confusion. There should be either both sides include exterior wall thickness or neither should have it, not just one side.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote:	13
	Agree with Committee Action:	12
	Disagree with Committee Action:	0
	Abstain:	0
	Non-Voting:	1

<b>PC 12 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Thomas Ingersoll, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	The figure shows a knee wall at the 5 ft height. One of the other walls should show a knee wall at a height of less than 5 ft, to indicate if the knee wall thickness is only included for heights of 5 ft and above.	
<b>Reason:</b>	The sketch as drawn, leaves an ambiguous situation, as to if you are considering one side as finished all of the time.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote:	13
	Agree with Committee Action:	12
	Disagree with Committee Action:	0
	Abstain:	0

Non-Voting:	1
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PC 13 – Section 3.6 Ceiling Height Requirements, Figure 5		Final Formal Action: Disapprove
<b>Submitter:</b>	Tom Blankenship, Steve Gregory Appraisals	
<b>Requested Action:</b>	Delete and substitute as follows	
<b>Proposed Change:</b>	Delete the newly proposed Figure 5 to the annex and add the following language to the end of Section 3.6:  <u>In rooms with sloped ceilings where actual side wall height at the ceiling is less than the 5 foot requirement, finished square footage calculations shall assume and add actual wall thickness to the dimension between the points where ceiling height is 5 feet</u>	
<b>Reason:</b>	This will clarify much better than the proposed change.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 14 – Section 3.6 Ceiling Height Requirements, Figure 5		Final Formal Action: Disapprove
<b>Submitter:</b>	Christi Adams, CAdams Real Estate/Louisiana	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	Please specify where you start measuring a 5ft ceiling height (as square footage) on a second story. Why would you include the thickness of one wall and not the other? or why not none at all?	
<b>Reason:</b>	Makes a confusing situation, more confusing, as opposed to clarifying the correct way to measure a 2nd story with ceiling heights of less than 5 feet	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 15 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Becky Ruskowski, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	Add a statement about whether you include or don't include an imaginary knee wall at the 5' height and what that thickness is.	
<b>Reason:</b>	on the sloped ceiling, It should say include or not include the imaginary wall at the 5 foot wall. Also, it should say what wall thickness should be used so that we are all consistent. As a Kentucky appraiser, we are required to use ANSI standards for measuring. This needs to be easily interpreted by the users. I don't care which way it reads as long as it is clear so we are all on the same page. Thanks for the consideration.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 16 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Melissa Bond, Self	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	Your illustration in regarding the ceiling height and its measurement is perfectly understood and appears to need no further commentary. However, please add clarification regarding the measurement from side-to-side of the room. On the right side (because the wall height is 5') the measurement is from the outside wall (encompassing the studs and exterior building component) BUT, the left side stops at the 5' mark (not accounting for the "invisible stud wall). Please provide additional commentary to the Standard such as <u>When measuring side-to-side in the sloped ceiling room, include any wall and exterior building material when the ceiling height is at least 5' or greater. When the ceiling height is less than 5' due to a sloped ceiling, do not include an additional measurement for a stud wall or the exterior building materials.</u>	
<b>Reason:</b>	Currently, there is a confusion for adding an "invisible stud wall" or not when an Appraiser measures sloped ceiling rooms that are less than 5' in some areas. Adding this statement would provide definitive direction and more conformity in use of the Standard. Left as it is, the lack of sufficient commentary causes the user of the Standard to rely on his/her personal judgement for measuring. Thereby, causing a lack on continuity in calculating square footage. All I'm asking for is that commentary be included that aligns with your illustration.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	

<b>Ballot II Results on Committee Action:</b>	Eligible to vote:	13
	Agree with Committee Action:	12
	Disagree with Committee Action:	0
	Abstain:	0
	Non-Voting:	1

<b>PC 17 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Robert Premecz, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	<p>As both an Emeritus Realtor and SRA designated appraiser, I offer the following:</p> <p>After reviewing the proposed changes, some confusion will remain with how sloped ceilings should be measured based on the revised Figure 5.</p> <p>The five (5') foot minimum in Figure 5 considers starting the measurement beyond or on the other side of the supporting five (5') foot knee wall. However, it creates an imaginary line at the five (5') foot point on the sloped ceiling. This creates a confusing bi-polar approach. In my opinion, this solution fails to follow the spirit of this standard which acknowledges and includes supporting or exterior walls in the balance of the standard.</p> <p>I suggest either two solutions to maintain internal consistency within the standard.</p> <ol style="list-style-type: none"> <li>1) Measure from the five (5') foot interior point, then add for a typical supporting wall (Preferred).</li> <li>2) Measure from the five (5') foot interior point(similar to the method most condominiums employ - ignores supporting walls).</li> </ol> <p>Finally, the edits to abbreviate measurements should not be done as it neither enhances the understanding or clarity of the standard, nor provides a universally accepted abbreviation for these measurements. For example, I personally use "SF" to mean square feet and have never used "sq. ft." in a form report due to space limitations.</p>	
<b>Reason:</b>	See public comment. Please contact me if what I propose remains unclear.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote:	13
	Agree with Committee Action:	12
	Disagree with Committee Action:	0
	Abstain:	0
	Non-Voting:	1



PC 18 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Thomas Harwood, Self	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	Add a definition of outside wall.	
<b>Reason:</b>	Clarification	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 19 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Paul Cooper, Self	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	<p>In order to decrease confusion, when it comes to sloped ceilings, please simplify the process. My suggestion would be to keep the 5' height rule and the 70% of area rule and measure the area as if it was a condo. Very simple measurement. Measure from the inside at the 5' marks. Then everyone will have the same measurement; no guess work as to the thickness of the outside wall, whether it be one wall or two walls. All appraiser's and realtor's will produce the same square footage for the measured area, provided they do the math correctly. I very much appreciate your consideration of this idea, and thank all of you for your continued effort to standardize these measurements.</p>	
<b>Reason:</b>	Change sloped ceiling measurement standards.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 20 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Glynn M Bergeron, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	I would like to comment on the proposed changes to ANSI. As a Real Estate Appraiser I strongly recommend that you do don't keep the proposed changes to second floor square foot calculation method of splitting the count from inside one wall to the outside of the opposite wall. Either keep it	

	<p>where we include the outside studs in the square footage or not count the studs in the square footage. BUT PLEASE DO NOT MAKE IT HALF AND HALF ! This will create much confusion in the real estate industry! As a teacher and trainer of Real Estate Agents and Appraiser Trainees I would highly recommend that you chose one or the other! Counting from one inside wall to the other outside wall studs will not be a good idea!</p> <p>Thank you for your consideration! Please feel free to call on me for input!</p> <p>Glynn Michael Bergeron Glynn Michael Appraisals LLC</p> <p>985 381-2530</p>										
<b>Reason:</b>	The reason for my above statement tot help avoid confusion in the industry!!										
<b>Substantiating Documents:</b>											
<b>CC Action:</b>	Disapprove										
<b>Modification of Comment:</b>											
<b>CC Reason:</b>	In favor of action on PC 41										
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>	Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13										
Agree with Committee Action:	12										
Disagree with Committee Action:	0										
Abstain:	0										
Non-Voting:	1										

<b>PC 21 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b><i>Final Formal Action: Disapprove</i></b>										
<b>Submitter:</b>	Patricia A Ploen, Self											
<b>Requested Action:</b>	Delete and substitute as follows											
<b>Proposed Change:</b>	When measuring side to side in a sloped ceiling room, include any wall and exterior stud when the ceiling height is at least 5 ft. When the ceiling height is less that 5 ft, do not include additional measurements for stud.											
<b>Reason:</b>	Less confusing											
<b>Substantiating Documents:</b>												
<b>CC Action:</b>	Disapprove											
<b>Modification of Comment:</b>												
<b>CC Reason:</b>	In favor of action on PC 41											
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13											
Agree with Committee Action:	12											
Disagree with Committee Action:	0											
Abstain:	0											
Non-Voting:	1											

PC 22 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Jonathan Harrison, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	The thickness of the structure's exterior walls shall be added to the dimensions beginning at the 5' height below a sloping ceiling.	
<b>Reason:</b>	When measuring regular GLA, we include the exterior wall dimensions. Ditto, the basement dimensions. What if there is, in fact, a physical wall at the 5' height and it is, in fact, an exterior wall. It has to be included for the sake of consistency.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 23 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Cheryl B. Bella, Self	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	Chimneys, windows, and other finished areas that protrude beyond the exterior finished surface of the outside walls and do not have a <u>finished</u> floor on the same level cannot be included in the calculation of square footage.	
<b>Reason:</b>	When a ceiling slopes to 5', an exterior wall thickness adjustment should be included. This makes the measurement consistent with other measurements taken to the exterior wall. The drawings indicate to exclude perimeter wall fireplaces, however in sec. 3.8 it indicates "Chimneys, windows, and other finished areas that protrude beyond the exterior finished surface of the outside walls AND do not have a floor on the same level cannot be included" A fireplace does have a floor, so this appears to contradict. If the argument is that a fireplace floor is not considered finished, then maybe the word "finished" floor should be included.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41. Chimney comment was out of scope for this round of comments.	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 24 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Kristi D Cox, Kristi D Cox Appraisal Services	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	Regarding the new measurement for the second story. Please make it from the wall to wall or add thickness of the wall, either or but not both. This appears to be very confusing and lacks consistency. Thanks	
<b>Reason:</b>	Please consider this for consistency as a yes or no statement to avoid confusion.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 25 – Section 3.6 Ceiling Height Requirements, Figure 5		<i>Final Formal Action: Disapprove</i>
<b>Submitter:</b>	Tina Langton, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	<p>Log 11, Section 3</p> <p>Bryan Reynolds: Section 3. Ceiling Height - This proposed change will create more confusion than clarity in the valuation profession and for other users. As a national instructor, I witness many students are already confused with this section and this attempt for clarity will fail. I strongly recommend this change not be made to this section. Darwin Ernst:</p> <p>The drawing I provided in my ballot response is more clear than the one that was provided in the ballot, but I would offer an updated version of this edited figure/image (see attached) to members based on my opinion that the upper floor measurement of all sloped ceiling heights should be restricted to the point of the sloped ceiling at the 5' mark above the floor, regardless of whether there is an exterior wall, pony wall, or any other type of wall beyond the point where the upper floor's ceiling height is 5' above the floor, so there is consistency in the upper floor measurement by all users of the standards. The proposed modification (see below) in item 11 to include the width of an exterior wall on upper floors beyond where the ceiling height reaches a point on the slope of an upper floor ceiling at a point 5' above the floor will be confusing to many potential users, so I am hopeful that we can discuss this motion further.</p>	
<b>Reason:</b>	Agree that measuring the actual space within the 5' height requirement is the most logical and easily explained to homeowners, realtors, lenders, etc.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	

<b>Ballot II Results on Committee Action:</b>	Eligible to vote:	13
	Agree with Committee Action:	12
	Disagree with Committee Action:	0
	Abstain:	0
	Non-Voting:	1

<b>PC 26 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Jimmy Hudspeth, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	The thickness of the wall should be added for areas with a sloped ceiling having walls at or above the 5 ft. mark. For areas with a sloped ceiling in which the wall is below the 5 ft. mark, the thickness of the wall should not be added. (See New Figure 5)	
<b>Reason:</b>	There seems to be much confusion and disagreement on whether to add for the thickness of a wall or "imaginary" wall in areas with sloped ceilings when measuring to the 5 ft. mark. I believe the above addition/modification would help to clarify whether or not to add for the thickness of a wall or "imaginary" wall. In my opinion, if a sloped ceiling extends below 5 ft., as required to be considered finished living area, then there should be no addition for an "imaginary" wall. Section 3.6 as it is, leaves a grey area which could be left up to individual interpretation. While New Figure 5 appears to clarify the intent, specific verbiage for clarification in Section 3.6 would help to insure that everyone would be more consistent in the measurement of areas with sloped ceilings.	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Disapprove	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>	In favor of action on PC 41	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote:	13
	Agree with Committee Action:	12
	Disagree with Committee Action:	0
	Abstain:	0
	Non-Voting:	1

<b>PC 27 – Section 4.3 Areas Not Considered Finished Square Footage</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Steve Kahane, Self	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	Jurisdictional exceptions may apply for finished living areas not connected that otherwise conform in quality and utility to the remainder of the house and that are commonly included in the square footage in both the tax records and MLS listings.	
<b>Reason:</b>	In my area, there is a subdivision where many of the houses have a detached living area often referred to as a casita. The area usually consists of a bedroom and bath that are similar in quality to the main dwelling. The spaces are usually attached somehow, either by a common wall or roof but are only accessible by walking outside the main dwelling. The houses are bought and sold with this space included in the gla and have been since the houses were new 15-20 years ago. Tax records and MLS typically include the casitas in the gla. I wouldn't typically consider this detached space part of the gla, but I do in this subdivision because the market considers it gla. This is only possible if we have the flexibility to make our own determinations of what is considered gla in a specific market.	

<b>Substantiating Documents:</b>											
<b>CC Action:</b>	Disapprove										
<b>Modification of Comment:</b>											
<b>CC Reason:</b>	CC prefers the current language in the standard.										
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>	Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13										
Agree with Committee Action:	12										
Disagree with Committee Action:	0										
Abstain:	0										
Non-Voting:	1										

<b>PC 28 – Section 4.3 Areas Not Considered Finished Square Footage</b>		<b>Final Formal Action: Disapprove</b>										
<b>Submitter:</b>	Steve Kahane, Self											
<b>Requested Action:</b>	Add new as follows											
<b>Proposed Change:</b>	Areas not connected to the house refer to spaces that are not accessible from a finished area of the primary dwelling.											
<b>Reason:</b>	"Not connected to the house" lacks specificity. Does "connected" refer to any part of the structure, the roof or just finished common walls? Does a living area conform in utility and appeal if you have to walk outside to get to it? Are quarters that share a common wall and roof connected if you have to exit the main dwelling to get there? What if it is connected only by a breezeway, is that connected? What about a finished/converted garage bay accessible only by walking through an unfinished portion of the garage?											
<b>Substantiating Documents:</b>												
<b>CC Action:</b>	Disapprove											
<b>Modification of Comment:</b>												
<b>CC Reason:</b>	CC prefers the current language in the standard.											
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13											
Agree with Committee Action:	12											
Disagree with Committee Action:	0											
Abstain:	0											
Non-Voting:	1											

<b>PC 29 – Commentary – Finished Stairs</b>		<b>Final Formal Action: Approve</b>
<b>Submitter:</b>	Melissa Bond, Self	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	...of the floor from which they descend.	
<b>Reason:</b>	The statement "Finished stairs suitable for year round use ascending to an unfinished upper area are included in the square footage calculation" is just not a finished thought. Please consider adding the words " of the floor from which they descend" to the end of your sentence. This added phrase would provide a complete clarification of what level the stair calculation is to be added to. So basically, the finished stair calculation is added to an UNFINISHED upper level in the example that you have provided in the Standard Commentary. All I'm asking is that this statement be as clear and definitive as the statement that is before it.	

<b>Substantiating Documents:</b>	
<b>CC Action:</b>	Approve
<b>Modification of Comment:</b>	
<b>CC Reason:</b>	
<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 11 Disagree with Committee Action: 1 Abstain: 0 Non-Voting: 1
<b>Ballot Comments</b>	
<b>Agree with Committee Action:</b>	
<b>Disagree with Committee Action:</b>	<p><b>Daniel Myers:</b> This makes sense for stories above the first story. However, it does not have the same logic when applied to the stairs descending from the first story to the basement. The main focus point of the home is the story in which one enters primarily, usually the first story (sometimes the only story). No matter how many stories a home has, it always has a first story. The stairs between 1<sup>st</sup> and 2<sup>nd</sup> story provide utility to the 2<sup>nd</sup> story way more than they do the 1<sup>st</sup> story, so this change makes sense there.</p> <p>However, I think that we ought to write it as “However, the area of both stair treads and landings proceeding from the first floor to a floor below is included in the finished area of the floor to which they descend, and the area of both stair treads and landings proceeding from the first floor or any other floor to a floor above is included in the finished area of the floor to which they ascend.”</p> <p>This is because stairs between 1<sup>st</sup> story and basement give utility to the basement in the home. Additionally, if the basement is unfinished, and the stairs’ only purpose is to provide access to an unfinished area of the home, why would we could the stairs toward any of the finished square foot areas? Stairs are arguably less useful than finished flat floor area, except for the thing they provide access to. In my opinion, the stairs should count toward the area that they provide access, and utility, to, from the first floor, or in relation to the first floor. This should be looked at from the perspective of a home begins on the first floor, and stairs service the other floors that they give access to from the first floor or higher floors.</p> <p>Materially, at least in cases I’ve handled, this is a bigger issue in relation to square footage of first floor versus unfinished basements. From a consumer’s perspective, whether square footage is in the first floor versus second floor is immaterial because it is still finished square footage area. However, whether area of stairs going to an unfinished basement is included matters because the unfinished basement generally is not included in most people’s understandings, nor the standards’ understanding, of finished square feet, so why would the stairs. I really thing this should be written in relation to the access / utility provided from the first floor, with an emphasis on situations where the basement is unfinished.</p>
<b>Abstain</b>	

<b>PC 30 – Commentary – Staircases</b>		<b><i>Final Formal Action: Disapprove</i></b>
<b>Submitter:</b>	Kelly Jo Kosse, Self	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	We count stairs on the first floor leading to unfinished basement and crawl spaces, therefore we would include stairs on the second floor leading to unfinished bonus rooms or attics on the third floor.	

<b>Reason:</b>	modify this rule										
<b>Substantiating Documents:</b>											
<b>CC Action:</b>	Disapprove										
<b>Modification of Comment:</b>											
<b>CC Reason:</b>	In favor of action on PC 29.										
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>	Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13										
Agree with Committee Action:	12										
Disagree with Committee Action:	0										
Abstain:	0										
Non-Voting:	1										

<b>PC 31 – Commentary – Staircase and Elevator</b>		<b>Final Formal Action: Disapprove</b>										
<b>Submitter:</b>	Kelly Jo Kosse, Self											
<b>Requested Action:</b>	Revise as follows											
<b>Proposed Change:</b>	We include staircases as we move among floors, therefore we would include elevators											
<b>Reason:</b>	Revise											
<b>Substantiating Documents:</b>												
<b>CC Action:</b>	Disapprove											
<b>Modification of Comment:</b>												
<b>CC Reason:</b>	Elevator shafts are already included in the standard.											
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13											
Agree with Committee Action:	12											
Disagree with Committee Action:	0											
Abstain:	0											
Non-Voting:	1											

## Emails and Letters as Public Comments

<b>PC 32 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Hamp Thomas, Carolina Appraisers	
<b>Requested Action:</b>	Request for Clarification/Modification	
<b>Proposed Change:</b>	<p>September 30, 2019</p> <p>Mr. Wayne Foley</p> <p>ANSI Consensus Committee</p> <p>Dear Mr. Foley and Committee Members:</p>	



Hello. I just finished reviewing the proposed changes for 2020. The majority of changes seem logical and beneficial, but I would like to offer a different perspective on the measurement of rooms with sloped ceilings.

I have studied the topic of square footage for over fifteen years. After speaking to agents, appraisers, assessors, builders, and many others all across the country, I have heard many different perspectives on measuring rooms with sloped ceilings. As I'm sure you understand, this is a topic with very strong opinions on all sides. While absolutely no changes are necessary to ANSI, if changes are to be made, the goal should be to help create the most consistency in measurements among real estate professionals.

The differences between methods of measuring sloped ceilings is only a difference of between 10-30 square feet in the majority of rooms. It's not a huge difference, but a difference in professionalism. It is a measurement that makes appraisers look bad amongst agents because the appraisers do not all handle it the same way. Under the current standard, we can have two people who are adamant that they strictly adhere to the ANSI standard. They both measure from the five-foot point on one wall to the five-foot mark on the opposite sloped ceiling. The first appraiser uses the measurement as it is, without the addition of any exterior wall. The second appraiser adds five-tenths (6") for both exterior walls, and they are both convinced they follow the ANSI Standard. That is a problem. I believe that the addition of one line would clear up this confusion. One line which states that you either "add five-tenths or six-inches for both exterior walls," or; "the measurement stops at the five-foot point on both sloped walls, without the addition of any exterior dimensions." Most appraisers don't really care which method is used, only that we all have the same rules that are easy to interpret and simple to explain to agents and homeowners. This rule needs to be simplified and not made more complicated.

In my opinion, the proposed change, which provides for the addition of the width of one exterior wall, would only create mass confusion among practitioners who are already confused by this measurement and it would only serve to increase the debate over this measurement. Rather than to help simplify the measurement and allow for more consistency among professional measurements, this could end up having the exact opposite effect.



We currently only have one state that mandates the ANSI standard for appraisers and none for real estate agents. After over twenty-three years in existence, there is no national acceptance of this standard, which should be able to bring together all professionals who calculate square footage for the public. I believe one of the reasons more states have not mandated ANSI is due to issues just like this, where there is a degree of subjectivity rather than a precise rule or guideline. This measurement could be a very positive change for ANSI and help to bring about more acceptance throughout the industry.

I authored the ANSI, Home Measurement, and the Power of Price-Per-Square-Foot CE course that is being taught online and live, and one of the most frequent comments we get is about the measurement of rooms with sloped ceilings. I sincerely hope you will take this opportunity to make this measurement simple and consistent and help promote consumer protection through the use of the ANSI Standard 2020. We continue to promote ANSI Z765 and are working to try to get more states to consider mandating the ANSI Standard. This change could help in our quest to bring about one language of real estate among professionals. It seems hard to imagine that one change could make such a dramatic difference, but in this case it could be just the change that tips the scales enough to help ANSI become a nationally mandated measurement standard.

After taking into consideration all the conversations and student comments over many years, I believe the best option is to consider the following text.

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	<p>Per ANSI Z765-2013</p> <p>Section 3 Calculation of Square Footage</p> <p>Ceiling Height Requirements</p> <p>To be included in finished square footage calculations, finished areas must have a ceiling height of at least 7 feet (2.13 meters) except under beams, ducts, and other obstructions where the height may be 6 feet 4 inches (1.93 meters); under stairs where there is no specified height requirement; or where the ceiling is sloped. If a room's ceiling is sloped, at least one-half of the finished square footage in that room must have a vertical ceiling height of at least 7 feet (2.13 meters); no portion of the finished area that has a height of less than 5 feet (1.52 meters) may be included in finished square footage.</p> <p>(Add this line)</p> <p>The measurement stops at the five-foot point on both sloped walls, without the addition of any exterior dimensions.</p> <p>-----</p> <p>I believe this method provides for the most consistent measurements in residential dwellings and especially in older homes where sloped ceilings and measurements can be very complex. This is the method we currently teach in our classes and seems to be the consensus among most agents and appraisers. I urge you to consider the simplification of this measurement and the change that best serves the home buying and selling public. I thank you for your time and efforts and look forward the updated ANSI Standard.</p> <p>Respectfully,</p> <p>Hamp Thomas</p> <p>Carolina Appraisers</p> <p>AppraiserELearning.com</p> <p>Whispering Pines, NC 28327</p> <p>pinehurstappraiser@gmail.com</p>										
<b>Reason:</b>	See above.										
<b>Substantiating Documents:</b>											
<b>CC Action:</b>	Disapprove										
<b>Modification of Comment:</b>											
<b>CC Reason:</b>	In favor of action on PC 41.										
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>	Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13										
Agree with Committee Action:	12										
Disagree with Committee Action:	0										
Abstain:	0										
Non-Voting:	1										

PC 33 – Section 3.6 Ceiling Height Requirements, Figure 5		Final Formal Action: Disapprove										
Submitter:	Craig Morley, National Association of Appraisers											
Requested Action:	Request for Clarification/Modification											
Proposed Change:	<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="text-align: center;">  <p><b>National Association of Appraisers</b> Unity • Strength • Professionalism</p> </div> <div style="text-align: right;"> <p>7113 San Pedro Ave, Suite 508 San Antonio, TX 78216 (210) 570-4950 <a href="mailto:info@naappraisers.org">info@naappraisers.org</a> <a href="http://www.naappraisers.org">www.naappraisers.org</a></p> </div> </div> <p>October 1, 2019</p> <p>TO: Nay Shah Home Innovation Research Labs 400 Prince George's Blvd. Upper Marlboro, MD 20774 301.430.6233 <a href="mailto:nshah@HomeInnovation.com">nshah@HomeInnovation.com</a></p> <p><b>RE: Square Footage - Method for Calculating: ANSI Z765</b></p> <p>Dear Mr. Shah-</p> <p>The National Association of Appraisers (NAA) is a nonprofit, 506c (6) association representing more than 1,500 appraisers across the country. While we support many of the changes proposed to ANSI Z765, we write today to express our concern about the changes proposed in Log #11.</p> <p>The proposal as written creates more confusion than clarity and the treatment of sloped ceilings should remain the same as written in ANSI Z765-2013. The proposal to add the thickness of one hypothetical wall makes little sense and to add the thickness of both walls leads to the question, how thick are the hypothetical walls? It is our belief the intent of the committee was to add value to the Standards by providing clarification and consistency where it can be found. This particular proposal provides neither.</p> <p>We appreciate the efforts made by the committee and support proposed changes to Logs 2, 25, CC01-4 and CC02-4. We thank you for your consideration of our comments and please feel free to contact us with any questions.</p> <p>Sincerely,</p>  <p>Craig Morley President, National Association of Appraisers</p> <hr style="border: 1px solid black;"/> <p>NAA * 7113 San Pedro Ave, Ste. 508, San Antonio, TX 78216 * (210) 570-4950 * <a href="mailto:info@naappraisers.org">info@naappraisers.org</a></p>											
Reason:	See above.											
Substantiating Documents:												
CC Action:	Disapprove											
Modification of Comment:												
CC Reason:	In favor of action on PC 41.											
Ballot II Results on Committee Action:	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Eligible to vote:</td> <td style="text-align: right;">13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td style="text-align: right;">12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td style="text-align: right;">0</td> </tr> <tr> <td>Abstain:</td> <td style="text-align: right;">0</td> </tr> <tr> <td>Non-Voting:</td> <td style="text-align: right;">1</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13											
Agree with Committee Action:	12											
Disagree with Committee Action:	0											
Abstain:	0											
Non-Voting:	1											

PC 34 – Section 3.6 Ceiling Height Requirements, Figure 5		Final Formal Action: Disapprove
Submitter:	Kimberly DeFilippis	
Requested Action:	Request for Clarification/Modification	
Proposed Change:	Please do not make any confusing changes regarding measurement to determine square footage where a sloped ceiling exists. FNMA is instituting appraisal waivers, or inspections by unqualified personnel to measure and photograph homes. Instituting changes that will further confuse individuals who are not properly trained in the first place will result in improper reflects of square footage, therefore further polluting the data pool.	
Reason:		
Substantiating Documents:		
CC Action:	Disapprove	
Modification of Comment:		
CC Reason:	In favor of action on PC 41.	
Ballot II Results on Committee Action:	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1	

PC 35 – Section 3.6 Ceiling Height Requirements, Figure 5		Final Formal Action: Disapprove
Submitter:	Michael Long, self	
Requested Action:	Revise as follows	
Proposed Change:	<p>Suggestions</p> <ol style="list-style-type: none"> <li>1. Crop border to make better use of paper space</li> <li>2. Increase text size for dims</li> <li>3. Increase text size for explanatory text</li> </ol> <p>–Thank you to all for their work –</p>	
Reason:	<p>SQUARE FOOTAGE—METHOD FOR CALCULATING: ANSI Z</p> <p>Staff Note: New Figure 5.</p>	

<b>Substantiating Documents:</b>											
<b>CC Action:</b>	Disapprove										
<b>Modification of Comment:</b>											
<b>CC Reason:</b>	In favor of action on PC 41.										
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>	Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13										
Agree with Committee Action:	12										
Disagree with Committee Action:	0										
Abstain:	0										
Non-Voting:	1										

## New Public Comments Post Aug 2019 Meeting from CC Members

PC 36 – Section 3.2 Attached Single-Family Finished Square Footage		Final Formal Action: Disapprove								
<b>Submitter:</b>	Brian Juedes									
<b>Requested Action:</b>	Revise the calculation of finished square footage to <b>exclude</b> exterior finishes of siding, stucco, brick and stone masonry, etc.									
<b>Proposed Change:</b>	<p>Change the words “exterior finished surface” to “exterior edge of the structure”.</p> <p><i>For detached single-family houses, the finished square footage of each level is the sum of finished areas on that level measured at floor level to the <del>exterior finished surface</del> exterior edge of the structure of the outside walls.</i></p> <p><i>For attached single-family houses, the finished square footage of each level is the sum of finished areas on that level measured at floor level to the <del>exterior finished surface</del> exterior edge of the structure of the outside walls or from the centerlines between houses, where appropriate.</i></p>									
<b>Reason:</b>	<p>To bring the ANSI Z765 finished square footage calculation in alignment with the standard of practice calculation for livable area from Architectural firms working in production housing.</p> <p>Exterior finishes often change for different Elevation Styles offered for the same standard plan. Under ANSI Z765-2013 a change from siding to brick masonry across the front of the home changes the finished square footage for the same standard plan. This creates complexity for the homebuilding industry and confusion for consumers.</p> <p>Under the proposed change, a standard plan would have the same finished square footage regardless of the exterior finishes.</p>									
<b>Substantiating Documents:</b>	SF Calculation Matrix – 2019-06-25									
<b>CC Action:</b>	Disapprove									
<b>Modification of Comment:</b>										
<b>CC Reason:</b>	Current language in standard is clear and this change is inconsistent with other areas of the standard.									
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>11</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>1</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	11	Disagree with Committee Action:	1	Abstain:	0
Eligible to vote:	13									
Agree with Committee Action:	11									
Disagree with Committee Action:	1									
Abstain:	0									

	Non-Voting: 1
<b>Ballot Comments</b>	
<b>Agree with Committee Action:</b>	
<b>Disagree with Committee Action:</b>	<b>Bryan Juedes:</b> The reason given for disapproval was that the AIA was not willing to participate in the original document over 20 years ago. This is not a valid reason for disapproval. The proposed change should be judged on it's merit.
<b>Abstain</b>	

<b>PC 37 – Section 3.2 Square Footage – Attached Single-Family Finished Square Footage</b>		<b>Final Formal Action: Disapprove</b>										
<b>Submitter:</b>	Brian Juedes											
<b>Requested Action:</b>	Revise the calculation of finished square footage to <b>add</b> another calculation method for measuring to the common walls of attached single-family homes.											
<b>Proposed Change:</b>	<p>Add the sentence “When the common wall between houses consists of two separate framed walls (one for each home) the finished area shall be measured to the outer (closest to the centerline) edge of the framed wall for that house”.</p> <p><i>For attached single-family houses, the finished square footage of each level is the sum of finished areas on that level measured at floor level to the exterior finished surface of the outside walls or from the centerlines between houses, where appropriate. When the common wall between houses consists of two separate framed walls (one for each home) the finished area shall be measured to the outer (closest to the centerline) edge of the framed wall for that house.</i></p>											
<b>Reason:</b>	<p>To bring the ANSI Z765 finished square footage calculation in alignment with the standard of practice calculation for livable area from Architectural firms working in production housing.</p> <p>Buildings of more than 2 attached units (houses) will have interior and end units, often with the same standard plan. Under ANSI Z765-2013 an interior unit will have more finished square footage than an end unit of the same standard plan because it measures to the centerline between houses on both sides. This creates complexity for the homebuilding industry and confusion for consumers.</p> <p>Under the proposed change, a standard plan would have the same finished square footage regardless of if it was an interior unit or end unit.</p>											
<b>Substantiating Documents:</b>	SF Calculation Matrix – 2019-06-25											
<b>CC Action:</b>	Disapprove											
<b>Modification of Comment:</b>												
<b>CC Reason:</b>	Already addressed in standard, would add unnecessary confusion.											
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>11</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>1</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	11	Disagree with Committee Action:	1	Abstain:	0	Non-Voting:	1
Eligible to vote:	13											
Agree with Committee Action:	11											
Disagree with Committee Action:	1											
Abstain:	0											
Non-Voting:	1											
<b>Ballot Comments</b>												
<b>Agree with Committee Action:</b>												

<b>Disagree with Committee Action:</b>	<b>Bryan Juedes:</b> The reason given for disapproval was that the AIA was not willing to participate in the original document over 20 years ago. This is not a valid reason for disapproval. The proposed change should be judged on it's merit.
<b>Abstain</b>	

PC 38 – Section 3.4 Openings to the Floor Below		Final Formal Action: Disapprove										
<b>Submitter:</b>	Brian Juedes											
<b>Requested Action:</b>	Revise the calculation of area at stairs so that the area of both stair treads and landings is included in the finished area of the floor from which the stairs <b>ascend</b> .											
<b>Proposed Change:</b>	Delete the words “proceeding to the floor below”, change the word “descend” to “ascend” and delete the words “not to exceed the area of the opening in the floor”.  <i>However, the area of both stair treads and landings <del>proceeding to the floor below</del> is included in the finished area of the floor from which the stairs <del>descend</del> <b>ascend</b>, <del>not to exceed the area of the opening in the floor</del>.</i>											
<b>Reason:</b>	To bring the ANSI Z765 finished square footage calculation in alignment with standard of practice calculation for livable area from Architectural firms working in production housing.  Under ANSI Z765-2013 on a simple 2-story home without a basement, the area of the stair treads and landings is included on the second floor AND the first floor. This varies from current and historical architectural standard of practice. This creates complexity for the homebuilding industry and confusion for consumers.  Under the proposed change, the stair calculation could be moved from under “Openings to the Floor Below” to its own “Stairs” heading for added clarity.											
<b>Substantiating Documents:</b>	SF Calculation Matrix – 2019-06-25 (Excel Sheet)											
<b>CC Action:</b>	Disapprove											
<b>Modification of Comment:</b>												
<b>CC Reason:</b>	In favor of action on PC 29.											
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>11</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>1</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	11	Disagree with Committee Action:	1	Abstain:	0	Non-Voting:	1
Eligible to vote:	13											
Agree with Committee Action:	11											
Disagree with Committee Action:	1											
Abstain:	0											
Non-Voting:	1											
<b>Ballot Comments</b>												
<b>Agree with Committee Action:</b>	<b>Daniel Myers:</b> I oppose this definition in relation to second stories, but approve in in relation to stairs ascending from the basement. The standard should, in some way, consider the story served by the stairs existing. For example, stairs that ascend to an unfinished second or third story don't serve or make more appealing the first story—their utility is solely to give access to the second story. So in relation to stairs going to a story from the main entrance story, it makes sense to count them toward the story that they provide utility. However, for basement stairs, the stairs provide utility to the basement mostly, so that one can leave the basement, or access the basement, as opposed to utility to the main story or entrance story. I'd suggest an edit that counts stairs toward square footage of the story they ascend to, except that stairs from the basement to the main story count toward the basement square footage.											

<b>Disagree with Committee Action:</b>	<b>Bryan Juedes:</b> The reason given for disapproval was that the AIA was not willing to participate in the original document over 20 years ago. This is not a valid reason for disapproval. The proposed change should be judged on it's merit.
<b>Abstain</b>	

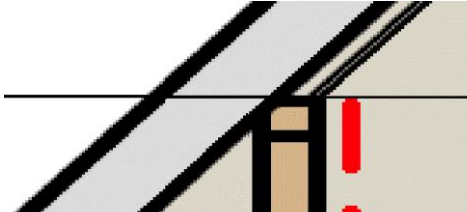
<b>PC 39 – Section 3.7 Finished Areas Connected to the House</b>		<b>Final Formal Action: Disapprove</b>										
<b>Submitter:</b>	Jean McCarty											
<b>Requested Action:</b>	Could we further address our previous discussion on unheated/cooled utility rooms and large walk in closets or storage rooms in older houses											
<b>Proposed Change:</b>	Could we clarify how these rooms should be treated.											
<b>Reason:</b>	<p>To be included in the calculated square footage, a room must be suitable for year round use. New construction typically puts h/a vents in large walk-in closets and utility rooms in our area. In older homes we find some rooms converted to large closets with no ventilation or h/a and we find utility rooms with no h/a. This leads to individual interpretation as to whether or not they are suitable for year round use. I, for one, do not count these storage rooms or utility rooms if they do not have h/a facilities <u>similar to the rest of the house.</u></p> <p>This also leads to the question as to the size of the room. At what size would a closet or storage room be considered an individual “enclosed space, suitable for year round use and embodying walls, ceilings and floors similar to the rest of the house” rather than an extension of the room it services? A 2 x 5 closet is merely an extension of the room it services, but a 120 SF walk in closet or storage room off habitable space is another matter.</p> <p>We require a 5 X 6 bathroom to have similar h/a facilities as the rest of the house in order to be included in the square footage. However, if that same area had a washer and dryer instead of toilet and bathing facilities, would we? I think we should.</p>											
<b>Substantiating Documents:</b>												
<b>CC Action:</b>	Disapprove											
<b>Modification of Comment:</b>												
<b>CC Reason:</b>	Addressed in current standard. CC believes current language is acceptable.											
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>		Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13											
Agree with Committee Action:	12											
Disagree with Committee Action:	0											
Abstain:	0											
Non-Voting:	1											

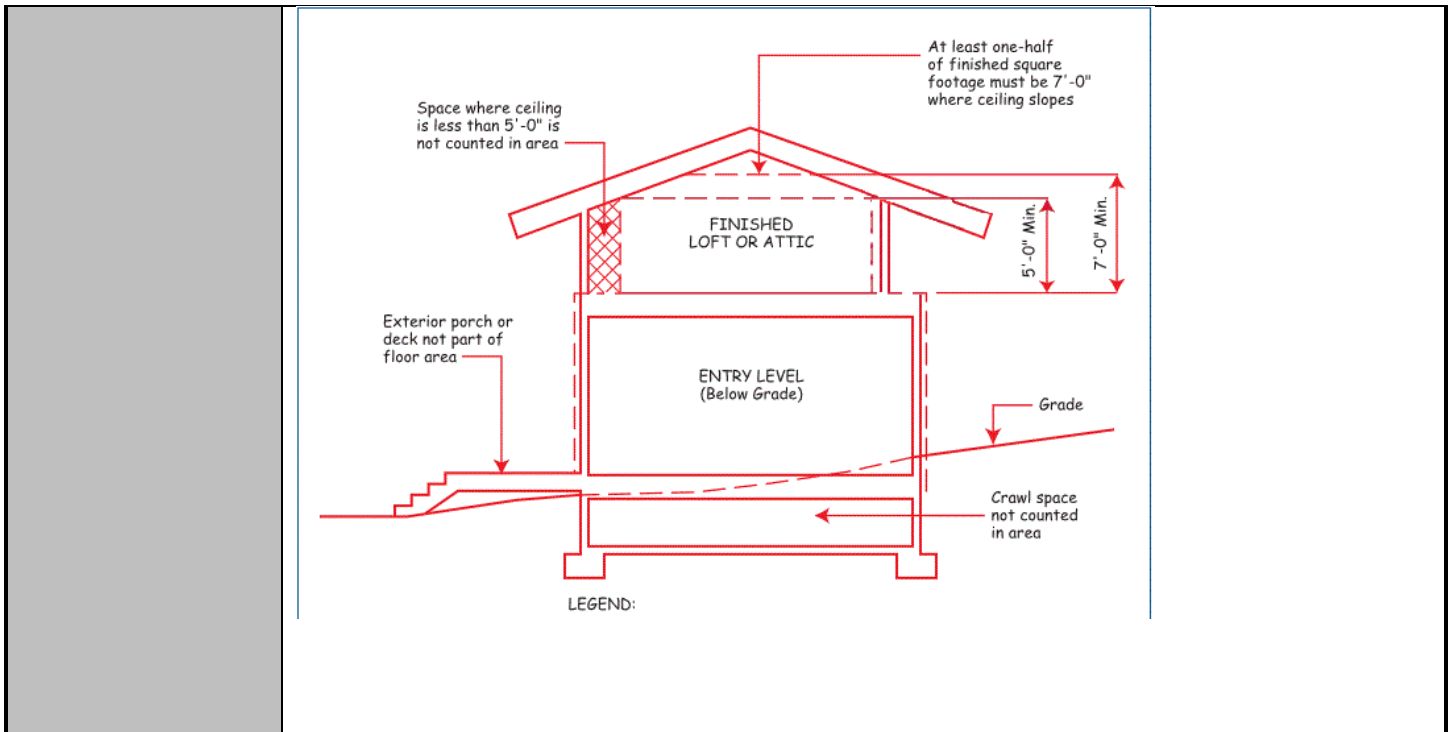
## Negative Ballot Comments as Public Comments from Ballot I

<b>PC 40 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Disapprove</b>
<b>Submitter:</b>	Bryan Reynolds	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	Section 3. Ceiling Height - This proposed change will create more confusion than clarity in the valuation profession and for other users. As a national instructor, I witness many students are already confused	



	with this section and this attempt for clarity will fail. I strongly recommend this change not be made to this section.										
<b>Reason:</b>	Negative Ballot Comment										
<b>Substantiating Documents:</b>											
<b>CC Action:</b>	Disapprove										
<b>Modification of Comment:</b>											
<b>CC Reason:</b>	In favor of action on PC 41.										
<b>Ballot II Results on Committee Action:</b>	<table> <tr> <td>Eligible to vote:</td> <td>13</td> </tr> <tr> <td>Agree with Committee Action:</td> <td>12</td> </tr> <tr> <td>Disagree with Committee Action:</td> <td>0</td> </tr> <tr> <td>Abstain:</td> <td>0</td> </tr> <tr> <td>Non-Voting:</td> <td>1</td> </tr> </table>	Eligible to vote:	13	Agree with Committee Action:	12	Disagree with Committee Action:	0	Abstain:	0	Non-Voting:	1
Eligible to vote:	13										
Agree with Committee Action:	12										
Disagree with Committee Action:	0										
Abstain:	0										
Non-Voting:	1										

<b>PC 41 – Section 3.6 Ceiling Height Requirements, Figure 5</b>		<b>Final Formal Action: Approve as Modified</b>
<b>Submitter:</b>	Darwin Ernst	
<b>Requested Action:</b>	Revise as follows	
<b>Reason:</b>	Negative Ballot Comment	
<b>Proposed Change:</b>	 <p>The drawing I provided in my ballot response is more clear than the one that was provided in the ballot, but I would offer an updated version of this edited figure/image (see attached) to members based on my opinion that the upper floor measurement of all sloped ceiling heights should be restricted to the point of the sloped ceiling at the 5' mark above the floor, regardless of whether there is an exterior wall, pony wall, or any other type of wall beyond the point where the upper floor's ceiling height is 5' above the floor, so there is consistency in the upper floor measurement by all users of the standards.</p> <p>The proposed modification (see below) in item 11 to include the width of an exterior wall on upper floors beyond where the ceiling height reaches a point on the slope of an upper floor ceiling at a point 5' above the floor will be confusing to many potential users, so I am hopeful that we can discuss this motion further.</p>	

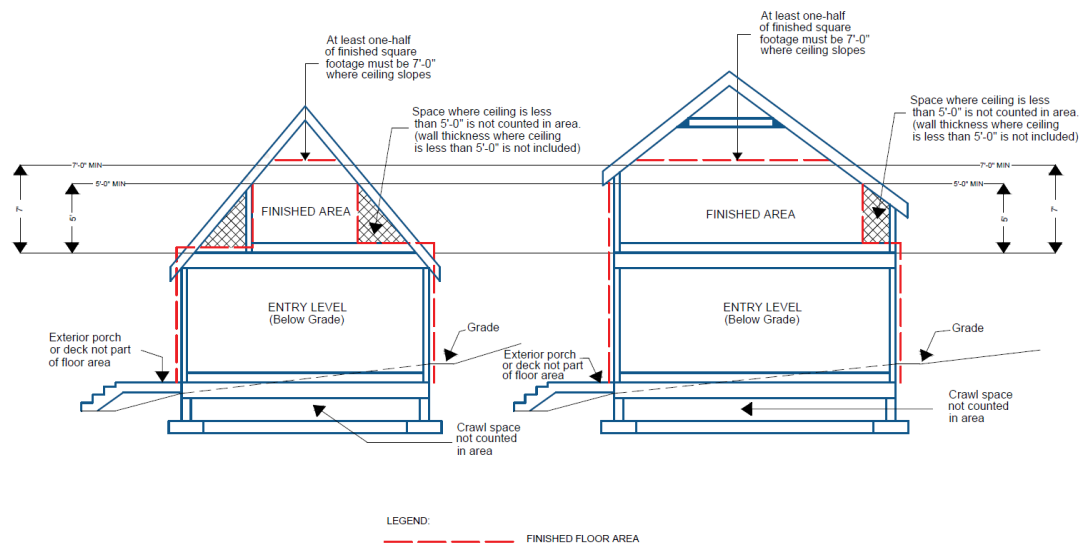


**Reason:** Negative Ballot Comment

**Substantiating Documents:**

**CC Action:** Approve as Modified

**Modification of Comment:** Replace Figure 5 with the following. See Appendix for Larger Figure.



**CC Reason:** CC agreed with the submitter that the figure needed edits and was unclear. Modifications kept the figure simple but added needed clarity.

<b>Ballot II Results on Committee Action:</b>	Eligible to vote: 13 Agree with Committee Action: 12 Disagree with Committee Action: 0 Abstain: 0 Non-Voting: 1
<b>Ballot Comments</b>	
<b>Agree with Committee Action:</b>	<p><b>Darwin Ernst:</b> There is this statement on the revised diagram of Figure 5, which is in two places: “Space where ceiling is less than 5’0” is not counted in area. (wall thickness where ceiling is less than 5’0” is not included)”</p> <p>I believe it was the intent of the committee for this to be:</p> <p>“Space where ceiling is <u>5’0” or less</u> is not counted in area. (wall thickness where ceiling is <u>5’0” or less</u> is not included)”</p> <p>I would strongly encourage us to change the language in both statements on the diagram to properly reflect the intent of the committee and avoid potential misunderstanding/misinterpretation of the standards in the future.</p> <p><b>Bryan Reynolds:</b> Space where ceiling is less than 5’0” is not counted in area. (wall thickness where ceiling is less than 5’-0” is not included)</p> <p>The comment regarding wall thickness is redundant as the first comment stated less than 5’ is not counted.</p> <p>This doesn’t address wall thickness above 5’. It will still leave the question unanswered. Recommend (wall thickness where ceiling is less than 5’-0” is not included)</p>
<b>Disagree with Committee Action:</b>	
<b>Abstain</b>	

## Non-Responsive

<b>PC 42 – Commentary – Flooring Requirements</b>		<b>Final Formal Action: Non-Responsive</b>
<b>Submitter:</b>	Kelly Jo Kosse	
<b>Requested Action:</b>	Add new as follows	
<b>Proposed Change:</b>	I agree with change	
<b>Reason:</b>	no changes necessary	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Non-Responsive	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>		

<b>PC 43 – Section 4. Statement of Finished Square Footage</b>		<b>Final Formal Action: Non-Responsive</b>
<b>Submitter:</b>	Kelly Jo Kosse	
<b>Requested Action:</b>	Revise as follows	

<b>Proposed Change:</b>	I agree with change
<b>Reason:</b>	no changes necessary
<b>Substantiating Documents:</b>	
<b>CC Action:</b>	Non-Responsive
<b>Modification of Comment:</b>	
<b>CC Reason:</b>	

<b>PC 44 – Section 4. Statement of Finished Square Footage</b>		<b><i>Final Formal Action: Non-Responsive</i></b>
<b>Submitter:</b>	Kelly Jo Kosse	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	I agree with change	
<b>Reason:</b>	no changes necessary	
<b>Substantiating Documents:</b>		
<b>CC Action:</b>	Non-Responsive	
<b>Modification of Comment:</b>		
<b>CC Reason:</b>		

## Public Comments on Second Draft

*Staff note: The following public comments relate to previously approved public comments (PC 02, PC 29, and PC 41) on the First Draft Standard. These Public Comments on the Second Draft will not receive a formal action from the Consensus Committee. Pursuant to Home Innovation Research Lab's procedures, Public Comments on the Second Draft are being circulated to the committee in order to afford the voting members of the consensus committee an opportunity to respond, reaffirm, or change their vote on the Formal Action related to the substantive changes (PC 02, PC 29, and PC 41) to the First Draft Standard upon which the public comment was submitted.*

### PC 02 – 1 Comment

PC 100 – Section 2.2 Finished Area	
<b>Associated PC:</b>	PC 02
<b>Submitter:</b>	Connie J Esbenson, Concept Appraisals
<b>Requested Action:</b>	Delete and substitute as follows
<b>Proposed Change:</b>	Please remove wording in parentheses and simply add "do not add width of exterior walls"
<b>Reason:</b>	Confusing and will still not be understood.
<b>Substantiating Documents:</b>	

### PC 41 – 13 Comments

PC 101 – Section 3.6 Ceiling Height Requirements, Figure 5	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Steve Kahane, Greater Houston Area Appraisals
<b>Requested Action:</b>	Delete and substitute as follows
<b>Proposed Change:</b>	Where the ceiling slopes, at least one-half of the finished square footage must be 7'-0".
<b>Reason:</b>	Easier to understand.
<b>Substantiating Documents:</b>	

PC 102 – Section 3.6 Ceiling Height Requirements, Figure 5	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Steve Kahane, Greater Houston Area Appraisals
<b>Requested Action:</b>	Delete without substitution
<b>Proposed Change:</b>	Space where the ceiling is less than 5'-0" is not counted in area. <del>(wall thickness where ceiling is less than 5'-0" is not included)</del>
<b>Reason:</b>	What does this mean? Is there a circumstance where we wouldn't include a finished area but would include the thickness of its walls?
<b>Substantiating Documents:</b>	

PC 103 – Section 3.6 Ceiling Height Requirements, Figure 5	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Robert N. Mossuto Jr, B. N. Appraisals, inc.
<b>Requested Action:</b>	Revise as follows
<b>Proposed Change:</b>	<p>I, as a state certified residential real estate appraiser of over 18 years, STRONGLY object to the ANSI second floor living area solution. You continue to subscribe to the notion that a ceiling height of 7 feet is required on the second floor in order to be legal living space or Gross Living Area (GLA)! That would exclude the 2<sup>nd</sup> floor living space or GLA of millions of homes across the United States as many early 1800 and early 1900 homes have second stories with 6.8, 6.5, and even 6.0-foot ceilings at the peak. They were purposely built shorter to conserve heat in upper bedrooms in which there was often just vent in the middle of the landing distributing heat to open door bedrooms!</p> <p>I think your decision will pull appraisers away from using your standard! Why would we as appraisers not include 2 - 4 or more bedrooms and often a bathroom, and maybe even a den on a second floor because ANSI says it's not considered living space because there is no 7-foot peak. Absolutely ridiculous! In my opinion, the market determines what is and is not living space! Not ANSI!!!!</p> <p>Just my thoughts and thank you for allowing me to share them. If this does become the ANSI standard, I will be one of those appraisers that does not use or refer to ANSI standards when it comes to homes with bedrooms and bathroom areas on the second floor when the ceiling height is under 7 feet! And I will explain my decision in the appraisal report and discuss my reasoning and why I decided to not use ANSI standards when I DID include the living area in the report as GLA.</p>
<b>Reason:</b>	The standard you propose will exclude valid living space from millions of homes across the United States and encourage appraisers to DISCONTINUE use of your standards.
<b>Substantiating Documents:</b>	

PC 104 – Section 3.6 Ceiling Height Requirements, Figure 5	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Kimberly Solesbee, Self
<b>Requested Action:</b>	Revise as follows
<b>Proposed Change:</b>	Please do not include in parenthesis "Wall thickness where ceiling is less than 5' is not included" as this just causes confusion. Thank you for your consideration
<b>Reason:</b>	Please do not include in parenthesis "Wall thickness where ceiling is less than 5' is not included" as this just causes confusion. Thank you for your consideration
<b>Substantiating Documents:</b>	

PC 105 – Section 3.6 Ceiling Height Requirements, Figure 5	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Diana T Jacob, Jacob RE Appraisal Consulting
<b>Requested Action:</b>	Revise as follows
<b>Proposed Change:</b>	"Space where ceiling is less than 5'-0" is not counted in area. ( <del>wall thickness where ceiling is less than 5'-0" is not included</del> )".

<b>Reason:</b>	I favor the additional language of adding geographic region and in the Commentary, "of the floor from which they descend.". I am not in favor of NOT adding wall thickness on the upper floor level as it is inconsistent with the technique for adding the lower level wall thickness. If you move forward with NOT adding for wall thickness on the upper floor then your sketch needs amending. It is unclear and confusing to have language that reads "Space where ceiling is less than 5'-0" is not counted in area. (wall thickness where ceiling is less than 5'-0" is not included)". It creates confusion to state any reference to wall thickness on the upper level of space that is less than 5'-0" when you've decided to exclude it from the upper-level that is area that will be counted as GLA. It's simply a non-issue; it's not area to be considered. Why would the wall thickness be mentioned at all in space that is not being considered as GLA?
<b>Substantiating Documents:</b>	

<b>PC 106 – Section 3.6 Ceiling Height Requirements, Figure 5</b>	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Wendell Hahn, Wendell Hahn & Associates
<b>Requested Action:</b>	Delete without substitution
<b>Proposed Change:</b>	(wall thickness where ceiling is less than 5'0" is not included)
<b>Reason:</b>	The statement is superfluous.
<b>Substantiating Documents:</b>	

<b>PC 107 – Section 3.6 Ceiling Height Requirements, Figure 5</b>	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Asia Fisser, Fisser Appraisals
<b>Requested Action:</b>	Revise as follows
<b>Proposed Change:</b>	Space where the ceiling is less than 5"-0" is not counted in area. Wall thickness above 5"-0" should be included.
<b>Reason:</b>	Exterior wall thickness is accounted for on the lower floor. For consistency wall thickness should be accounted for on upper floors.
<b>Substantiating Documents:</b>	

<b>PC 108 – Section 3.6 Ceiling Height Requirements, Figure 5</b>	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Ann M. Wizinsky, AMH Appraisals
<b>Requested Action:</b>	Revise as follows
<b>Proposed Change:</b>	The comment in an area where the height is less than 5 feet on the sloped ceiling should not be included since it is ambiguous. It should say something to the effect that if more than 50 percent of the area is over five feet, that area between 5 feet and greater should be included in the GLA of the dwelling.
<b>Reason:</b>	If a typical end user has to be slumped over while in this area, they would not be comfortable working (making beds, vacuuming, etc.).
<b>Substantiating Documents:</b>	

PC 109 – Section 3.6 Ceiling Height Requirements, Figure 5	
Associated PC:	PC 41
Submitter:	William Getter, Getter Appraisals, LLC
Requested Action:	Delete and substitute as follows
Proposed Change:	Space where area is less than 5'-0" is no calculated in area. (wall thickness where ceiling is less than 5' is <del>Not</del> included  to be added at 1/2 foot for eachwall)
Reason:	If you include wall thicknesses of 2nd levels, to be consistent, you should include wall thicknesses of upper 1/2 stories. They still have a wall!
Substantiating Documents:	

PC 110 – Section 3.6 Ceiling Height Requirements, Figure 5	
Associated PC:	PC 41
Submitter:	Vern Meyer, Superior Appraisal Services
Requested Action:	Add new as follows
Proposed Change:	In addition, areas beneath stairs are included in the finished square footage regardless of the distance between the stairs and the floor below or of the degree of finish of that area. <u>[i.e. - basements that might otherwise be unfinished are credited with a finished area equal to that area under the stairs that lead to the basement.]</u>
Reason:	This section's commentary leads the reader to believe that all areas beneath stairs are considered to be 'finished' area. This statement, or something similar, provides clarity in two ways. First, it provides specific clarification for that area beneath stairs in a basement (per the comments copied above). Second, because everyone can envision a typical unfinished basement in their market, explaining that even such floors have finished area beneath the stairs will make it obvious to users that the amount of finish, if any, beneath and around stairs on other levels do not affect the 'finish' beneath these stairs.
Substantiating Documents:	

PC 111 – Section 3.6 Ceiling Height Requirements, Figure 5	
Associated PC:	PC 41
Submitter:	William H All, Metro-West Appraisal Co. LLC
Requested Action:	Revise as follows
Proposed Change:	They should continue to add wall thickness (6" or so on either side) to be consistent with the lower floors where exterior measurements are used.
Reason:	to be consistent with the lower floors where exterior measurements are used.
Substantiating Documents:	

PC 112– Section 3.6 Ceiling Height Requirements, Figure 5	
Associated PC:	PC 41
Submitter:	Bob Morrор, Morrow Realty LLC
Requested Action:	Revise as follows



<b>Proposed Change:</b>	Please consider wall thickness on both sides of the wall on the upstairs space when you have a sloped ceiling.
<b>Reason:</b>	This will be consistent with the downstairs area when we use exterior wall measurements.
<b>Substantiating Documents:</b>	

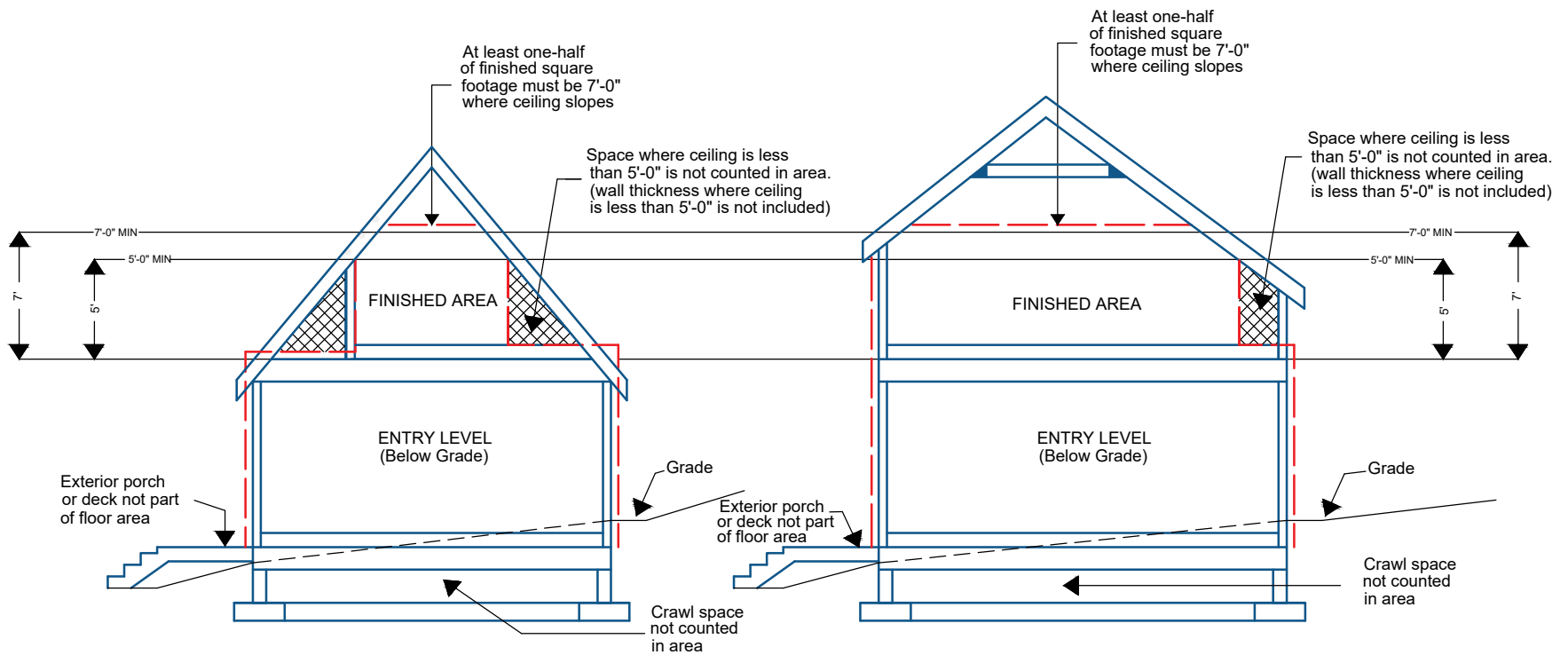
<b>PC 113 – Section 3.6 Ceiling Height Requirements, Figure 5</b>	
<b>Associated PC:</b>	PC 41
<b>Submitter:</b>	Charles Bowers, Bowers Company
<b>Requested Action:</b>	Revise as follows
<b>Proposed Change:</b>	Need clarification on finished area where roof slope or other structural imposition results in 'finished area' with ceiling height of less than 7'. I believe it would be a good idea to include the unfinished area of the vertical framing that forms the partition wall that is up to 5' in height, when there is a reasonable idea of the thickness of the wall.
<b>Reason:</b>	Having been in the building and appraisal business for more than 40 years, my experience is that typical framing since the 60's has been 2X4's (which are only 3½", and 1/2 inch drywall. Without evidence to the contrary, adding the additional 4" makes it consistent with including exterior wall thicknesses in the floor area calculation. I think you need the outside portion of a wall to create a structure with 'floor space'. 'Use all the wall'
<b>Substantiating Documents:</b>	

Held Comments – 1

*Staff Note: Any comments on any other provisions of the Second Draft Standard that have not changed from the First Draft Standard will not be accepted as part of the 2020 revision cycle, they will be addressed in the next revision cycle.*

<b>PC 114 – Section 3. Calculation of Square Footage</b>		<b>Held</b>
<b>Associated PC:</b>	N/A	
<b>Submitter:</b>	Matt Bowersox, Bliss Associates, LLC	
<b>Requested Action:</b>	Revise as follows	
<b>Proposed Change:</b>	"the house is measured to the nearest inch or tenth of a foot" should be changed to:  "the house is measured to the nearest 6" or one half of a foot" or  "the house is measured to the nearest 3" or one quarter of a foot"	
<b>Reason:</b>	The nearest one inch is way too precise to expect an appraiser to measure in the real world. Most appraisers measure each wall to the nearest half foot, such as 20' or 20.5' or 21'. At a minimum it should be raised to the nearest 3" mark.	
<b>Substantiating Documents:</b>		

## Appendix A – Replacement for Figure 5, PC 41



LEGEND:

----- FINISHED FLOOR AREA