

Comments on proposed revisions to the Rhode Island Life Safety Code

I appreciate the opportunity to comment on the proposed revisions to the Rhode Island Life Safety Code (RILSC). These comments relate to exit signs and will help align the RILSC with the recently revised Rhode Island State Building Code (RISBC-1), consistent with RIGL 23-28.01-6.

Around the world, a graphical symbol (pictogram) for use on exit signs has been adopted in many countries – often as a requirement.



It features a larger and more conspicuous directional arrow than a typical text exit sign, thus making it easier to recognize the direction of the exit.

Since the 2003 edition of NFPA 101, this pictogram has been allowed... but only if individually approved by the AHJ (and in Rhode Island, any provision requiring individual AHJ approval requires a formal variance from the Board). As a member of the NFPA 101 Means of Egress committee explained back in 2003: "In addition, the NFPA 170 symbol set does not have any prescribed sizes and makes no claims as to viewing distance (3-1.2.4). ... UL will need to make parallel changes in test methodology for Listed internally illuminated signs. These necessary steps are readily accomplished, but until they are established and field tested we believe it is premature to permit pictograms as substitutes for legally required legends."

Years later, UL 924 would eventually be revised. This can be found in section 42 (previously numbered 40B), "Graphical Symbol Exit Signs – Construction", of the standard. This section clearly and explicitly allows the pictogram and specifies height/size requirements for it. Due to this, UL-listed internally illuminated exit signs with the pictogram are on the market today.

The 2021 editions of NFPA 101/proposed RILSC and the IBC/RISBC-1 reference the updated edition of UL 924.

The IBC/RISBC-1 regulates exit signs differently based on the illumination method (compare IBC/RISBC-1 sections 1013.5 and 1013.6). The result of this is that under the 2021 IBC/RISBC-1, it is possible to use the pictogram for internally illuminated exit signs.

The 2027 IBC is set to allow the pictogram for externally illuminated exit signs as well – using the same height/size requirements as UL 924.

<https://www.iccsafe.org/wp-content/uploads/GROUP-A-2024-REPORT-OF-THE-COMMITTEE-ACTION-HEARING-CAH-2.pdf> (item E78-24)

The IBC Means of Egress committee's stated: "The proposal was approved because this makes the allowances for exit signs that are externally illuminated consistent with internally illuminated exit signs.

Suggested Revisions for the RILSC: In section 7.10.3.2, replace "Where approved by the authority having jurisdiction" with "Where in compliance with the State Building Code". This would automatically allow the pictogram for internally illuminated exit signs, in compliance with the 2021 IBC/RISBC-1. It would also reduce the need for future revisions to this section as future versions of the IBC/RISBC-1 are adopted.