**Code Amendment Proposal Form**
For public amendments proposed to the 2018 editions of the International Codes

**Instructions:** Upload this form and all accompanying documentation at www.denvergov.org/BuildingCode. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by **April 26, 2019**.

---

**CONTACT INFORMATION**

**Name:** Greg Bradshaw  
**Date:** 4-26-2019  
**Phone:** 303-475-7714  
**Email:** greg.bbsi@gmail.com  
**Organization:** Bradshaw Building Solutions, Inc.

I hereby grant and assign to City and County of Denver all rights in copyright I may have in any authorship contributions I make to City and County of Denver in connection with this proposal. I understand that I will have no rights in any City and County of Denver publications that use such contributions in the form submitted by me or another similar form and certify that such contributions are not protected by the copyright of any other person or entity.

Signature:

---

**AMENDMENT PROPOSAL**

Please use a separate form for each proposal.

1) **Code(s) associated with this proposal. Please use acronym:** DBC-IFC

If you submitted a separate coordination change to another code, please indicate which code: __________________________

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Code Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBC-xxxx</td>
<td>Denver Building Code–xxxx (code) amendments (e.g., DBC-IBC, DBC-IEBC)</td>
</tr>
<tr>
<td>IBC</td>
<td>International Building Code</td>
</tr>
<tr>
<td>IEBC</td>
<td>International Existing Building Code</td>
</tr>
<tr>
<td>IECC</td>
<td>International Energy Conservation Code</td>
</tr>
</tbody>
</table>

2) Please check here if a separate graphic file is provided: ☐

*Graphics may also be embedded within your proposal below.*

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is **BOLDING, STRIKEOUT** AND **UNDERLINING**. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

<table>
<thead>
<tr>
<th>Code Sections/Tables/Figures Proposed for Revision:</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBC-IFC 909.13.7 Motor controllers and variable frequency drives (VFDs).</td>
</tr>
</tbody>
</table>

**Note:** If the proposal is for a new section, indicate (new).

<table>
<thead>
<tr>
<th>Proposal:</th>
</tr>
</thead>
<tbody>
<tr>
<td>909.13.7 Motor controllers and variable frequency drives (VFDs). Motor controllers and variable frequency drives (VFDs) provided to operate fans of smoke exhaust and pressurization systems shall be installed in secure, conditioned and protected locations. These devices shall be located in a room or space</td>
</tr>
</tbody>
</table>
separated from the remainder of the building by a 1-hour fire-resistance rated fire barrier. Power wiring and control wiring between switchgear and/or panels, motor controllers, VFDs and smoke control system motors and control dampers shall be in non-flexible metallic raceway up to the component connection. VFDs for smoke control system fans shall NOT be equipped with a manual bypass switch.

**Note:** Show the proposal using strikeout, underline format. At the start of each section, give one of the following instructions:
- Revise as follows:
- Add new text as follows:
- Delete and substitute as follows:
- Delete without substitution:

### Supporting Information:
DFD currently will not allow a VFD bypass. And any SCS fan that needs to run at less than 60 HZ (sometimes as low as 12 HZ for stair fans) that running at 60 HZ could cause a very high pressure, causing stairwell or elevator doors to not operate.

**Note:** This section MUST include these items:
- **Purpose:** Saves money & confusion
- **Reasons:** Meets current DFD requirements.
- **Substantiation:** NA
- **Bibliography:** NA

### Referenced Standards:

**Note:** List any new referenced standards that are proposed to be referenced in the code.

### Impact:

**Note:** Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:
- The effect of the proposal on the cost of construction:  □ Increase  □ Reduce  □ No Effect
- The effect of the proposal on the cost of design:  □ Increase  □ Reduce  □ No Effect
- Is the proposal more or less restrictive than the I-codes:  ☒ More  □ Less  □ Same

### Departmental Impact: (To be filled out by CPD staff)

**Note:** CITY STAFF ONLY. Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:
- The effect of the proposal on the cost of review:  □ Increase  □ Reduce  □ No Effect
- The effect of the proposal on the cost of enforcement/inspection:  □ Increase  □ Reduce  □ No Effect