

May 24, 2005

Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-3145-IFC
PO Box 8018
Baltimore, MD 21244-8018

Subject: Comments Interim Final Rule RIN 0938-AN36
(70 Federal Register 15229 et. sec., March 25, 2005)

To whom it may concern:

The International Code Council® (ICC®) submits the attached comments regarding the interim final rule issued by the U.S. Department of Health and Human Services, Centers for Medicare and Medicaid Services (70 Fed Reg 15229) to adopt the temporary interim amendment for Alcohol Based Hand Rub Solutions as published by the National Fire Protection Association (NFPA), as well as the new smoke detector installation requirements for nursing homes.

The ICC is a 35,000 + member association dedicated to building safety and fire prevention, whose mission is to provide the highest quality codes, standards, products, and services for all concerned with the safety and performance of the built environment.

The codes developed under the auspices of the ICC serve as a baseline for the design, construction, operation and maintenance of the majority of both public and private sector buildings in the U.S. As such the codes developed by the ICC (I-Codes®), are readily recognized and understood by building owners, product manufacturers, designers, contractors, code officials and all others involved in building design, construction, approval, and operation. The majority of U.S. state and local government agencies that adopt codes adopt and implement building safety and fire prevention codes developed by the ICC. In addition most federal agencies have building construction policies that require the use of the I-Codes or those policies refer to the state or local code proximate to the federal facility.

The ICC appreciates the opportunity to provide comments. Should additional information be needed please do not hesitate to contact us.

Sincerely,



Sara C. Yerkes
Senior Vice President of Government Relations
International Code Council
Enclosure

Comments on “Location” of smoke detectors