

Mr. Mark Huff
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OSHA Docket Office
Docket No. S-778-B
Room N-2625
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Delivered by fax to: 202-693-1648

Re: Support for Recognition of the International Building Code (IBC) and International Fire Code (IFC) as proposed by OSHA in Docket S-778B

As a professional in building safety and fire prevention, I support OSHA's proposal to accept the building egress provisions of the IBC and the IFC as offering protection at least equal to the federal building egress requirements established by OSHA.

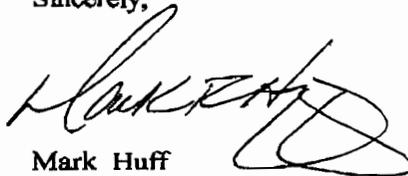
The IBC is now recognized, adopted and applied, in jurisdictions such as my own all across the country, as America's single comprehensive building safety and fire prevention code. And as comprehensive and complementary building safety and fire prevention codes, the IBC and IFC include requirements for egress that can and should be depended upon to satisfy the OSHA rules.

The detailed section by section analysis provided separately to OSHA by the International Code Council fully demonstrates that a building designed and constructed to the specifications of the IBC and IFC provides equivalent protection to the federal requirements. Providing this recognition can reduce construction design and approval delays by removing the need to demonstrate compliance with dual codes, and will do so without diminishing protections for worker safety.

In addition to removing a regulatory redundancy, this recognition will better couple the ongoing cooperative work of OSHA and the thousands of local and state building and fire code officials and inspectors across this country. We have a shared mission in protecting the health of America's workers in buildings, and this keeps the focus on a single shared means of promoting this goal.

Thank you for the review of my comments.

Sincerely,


Mark Huff