



# Technical Services Information Bureau

November 21, 2024

California Building Standards Commission  
Attention: Public Comments  
2525 Natomas Drive Suite 130  
Sacramento, CA 95833

**Reference: Government Code Sections 11346.5(a)(1), 11346.5(a)(15) and 11346.5(a)(17)**  
**Subject: Item 19 – Section 2507.3**

Dear California Building Standards Commission

The Technical Services Information Bureau (TSIB) thanks you for addressing our concerns regarding the proposed language changes for section 2507.3.2 of the California Building Code. We applaud the clarification of the type of screw to be used in lieu of a hook shank staple and the minimum penetration of the fastener into the wood support.

*“A No. 8 wood screw in accordance with ANSI B18.6.1 with 1-inch minimum penetration into a wood joist shall be permitted to be used in lieu of the staples if they are installed with a 1-inch diameter washer”.*

We are uncertain why the No. 8 wood screw should be in accordance with ANSI standards. To be more consistent with the building code that references ASTM standards for lath, ASTM C1861 should be the referenced standard. We also believe ASTM C1861 also requires a wider minimum head dimension of .437 than the minimum head dimension of ANSI B18.6.1 that may be less.

We accept that the commission will recommend the use of a 1-inch diameter washer when a No. 8 wood screw is used, although we feel the washer is unnecessary. However, we feel there is still work to be done to further clarify language on the actual placement of earthquake staples (or the alternative) that is also stated in this section. We frequently find this part of the section is often misinterpreted by the design community. We would like to propose further clarification for the placement of earthquake staples to secure metal lath for the next code cycle and TSIB would like to provide any assistance for this clarification to occur.

Again, we appreciate the opportunity to submit a public comment. Please feel free to contact me for further assistance. I can be reached at [bryan@tsib.org](mailto:bryan@tsib.org) or via phone at (714) 221-5530.

Item 19 Section 2507.3 – October 21, 2024

Sincerely,

A handwritten signature in black ink that reads "Bryan Stanley". The signature is written in a cursive style with a large initial 'B' and a long horizontal stroke at the end.

Bryan Stanley  
Architectural Advisor  
Technical Services Information Bureau