



Structural Building Components Association

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January 28, 2012

Mr. Thomas D. Searles, President
American Lumber Standard Committee, Inc.
19715 Waters Road
Germantown, MD 20874

Re: SBCA Requests Submission for Consideration at the Upcoming ALSC Board of Review (BoR) Meeting on February 23, 2012 and a few Additional SBCA Questions for ALSC Perspective

Dear Tom,

I would like to again express my sincere appreciation for the approach ALSC has taken with respect to resolving very challenging issues. As the lumber evaluation process carries forward it is our goal to become more intimately involved in the process so that we have the knowledge needed to make better longer range decisions on behalf of our membership. To that end we have the following thoughts and questions:

1. At the upcoming ALSC Board of Review meeting there is the following agenda item:
 - a. **SOUTHERN PINE INSPECTION BUREAU (SPIB) REQUESTS**
 - i. A. SPIB has submitted design values for No. 2 Dense and No. 2 Non-Dense 2 to 4 inches thick and 2 to 4 inches wide. These design values were approved by the SPIB Board of Governors on January 18, 2012. This information has been submitted to the FPL for review.
 - ii. B. SPIB has informed the Board of its intention to add additional MSR/MEL classifications to the SPIB rules. These additional classifications are presented in the SPIB Supplements No. 10 and 11.
 - b. SBCA would appreciate fully understanding how the Board of Review intends to evaluate this proposal when the original SPIB submission on their testing states the following with respect to dense Southern Pine :

8.0 Dense Classifications for Southern Pine

When the original in-grade testing was used to develop design values, enough data existed to sort out those pieces that met the grading rule definition of "dense" lumber. Increase factors were calculated by comparing property estimates for the dense subsets to those of the unclassified data. Likewise, what was left over after the dense material was sorted out was, understandably, lower in strength than the unclassified data and reduction factors for nondense material were applied. At this point in time, there is not enough data to justify publishing separate design values for lumber visually graded as dense. Therefore, at least until more data can be collected, dense lumber will carry the same design values as the unclassified grades.



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c. ALSC has taken the following position:

As noted above, the current phase of the testing performed by SPIB and Timber Products Inspection involved only No. 2 2x4's.

The Board is constrained by this controlling authority to decline to approve the proposed design values for grades and sizes of Southern Pine other than No. 2 2x4 at this time. In reaching this conclusion, the Board is mindful that testing is currently

underway on a full matrix sample consistent with Section 7.4 of the D-1990. The Board urges SPIB to proceed with all deliberate haste to complete this testing and analysis at the earliest opportunity.

ASTM D-1990 does contemplate the development of design values for a single size and species cell. (See, Section 4.2.) The information submitted on this size and grade did, in the Board's judgment, comport with D-1990 and applicable statistical principles. These No. 2 2x4 design values are approved with a recommended effective date of June 1, 2012, which will allow for their orderly implementation.

This states clearly that the ruling applies only to No. 2 SP per the SPIB testing that was performed on No. 2 SP. And the supplemental ruling states:

This is to clarify the January 11, 2011 ruling of the Board regarding the proposed design values for southern pine species. The ruling should have made clear that the approval was for No. 2 2x4 lumber and all lower grades of this size (i.e. No. 3, Stud, Construction, Standard and Utility). The recommended effective date for all of these grades is June 1, 2012. This approach is consistent with ASTM D-1990 and is mandated by the practical applications of these grades in the construction industry.

This states clearly that ALSC meant that the ruling was for 2x4 No. 2 SP and all lower grades of 2x4. This does seem to include 2x4 No. 2 Dense as that is a higher design value grade and there was not enough testing undertaken to deal with Dense per SPIB. Obviously, ALSC is very specific that when no testing of the other grades and sizes is available no determination can be made until test data is available. This seems quite reasonable and this logic seemingly should apply to 2x4 No. 2 Dense.

d. Given the foregoing and based on the following facts:

- i. There is no data available to support a reduction in the design values of the dense or higher grades at this time;
- ii. There are grading procedures available to continue to grade out density; and
- iii. Higher density lumber is known to be directly correlated with higher strength.

Will ALSC be consistent in its conclusions/ruling with respect to 2x4 No. 2 as it pertains to 2x4 No. 2 Dense? Please respond Yes or No.

If the answer is No, please provide a detailed reason why the conclusion to include No. 2 Dense is different than one should expect given that SPIB specifically states that they do not have enough data to make a definitive strength determination with respect to the Dense classification. Also, please provide the ALSC BoR determination based on the facts provided to it that may be different than we currently have at our disposal.

January 28, 2011

SBCA Letter to ALSC Requesting Lumber Design Value Information

2. At the January 5, 2012 Board of Review meeting the following information was presented:


IV REVIEW OF MONITORING DATA ON SPRUCE-PINE-FIR (SPF)

The Board stated it had received monitoring data from NLGA concerning the SPF species grouping. The Board noted the Forest Products Laboratory letter of January 4, 2012 reviewing the SPF data which requested further clarification of the data. Mr Fantozzi stated that NLGA had received the FPL comments and was in the process of responding to the points. The Board in Executive Session tabled the review of its monitoring of data on SPF pending receipt of additional information from NLGA.

- a. With respect to the NLGA testing program we would appreciate getting a copy of all information that has been submitted to ALSC for review including but not limited to:
 - i. The NLGA sampling plan;
 - ii. Current testing data and any related test data analysis;
 - iii. Any and all FPL evaluations of sampling plans and test data and testing analysis; and
 - iv. Any other information that is relevant to the NLGA design value evaluation process.
 - b. We would also request through ALSC that NLGA provide SBCA with a detailed implementation plan with respect to any design value changes that may be taking place in the future for the SPF grades that they oversee that are or could be used for structural end uses. This should include but not be limited to:
 - i. The date(s) of final testing and evaluation of the test data;
 - ii. An early warning if there appears, based on the expertise of NLGA, a significant change (i.e. greater than 5%) in design values and a reasonable projection with respect to the design value changes that could be seen;
 - iii. The date or projected date of assignment of changes to design values;
 - iv. The date(s) or projected date(s) of FPL review, ALSC submission and review and public review of the assigned design values; and
 - v. The transition plan that will be proposed for implementation; and
 - vi. The dates or projected dates of the implementation per the transition plan of any design value changes in the market.
3. We would appreciate the same information that we have requested of NLGA in items "2a" and "2b" from SPIB, WWPA and any other rules writing and design value assigning agency where structural lumber products using these grade rules and design values may be sold to the component manufacturing industry for structural load carrying end use.

Thank you very much for your consideration of the foregoing and we look forward to getting the information we have requested at earliest convenience.

Respectfully Yours,



Kirk Grundahl, P.E.
Executive Director