



# MACON-BIBB COUNTY

## Department of Business Development Services

200 Cherry Street, Suite 202  
Macon, GA 31201

INTERPRETATION #

MBC-0003

EFFECTIVE DATE:

May 1, 2020

REVISION DATE:

PAGE #

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AUTHOR:

Don Wilkins, CBO, CFM, MCP

REVISION #:

### CODE INTERPRETATION: Low Occupant Load Assembly Occupancies

#### 1. SCOPE / PURPOSE

- 1.1. The purpose of this binding Code Interpretation is to reconcile the conflict between the 2018 Life Safety Code and the 2018 International Building Code for Assembly occupancies with a design occupant load of less than 50 (fifty).
- 1.2. In addition, this binding Code Interpretation is meant to provide consistency between the Macon-Bibb County staff and registered design professionals that provide construction documents to multiple jurisdictions in Georgia and at a national level.

#### 2. ADOPTED CODE / DEFINITIONS

##### 2.1. Adopted Codes:

- 2.1.1 **2018 Life Safety Code Section 3.3.196.2 Assembly Occupancy.** An occupancy (1) used for a gathering of 50 or more persons for deliberation, worship, entertainment, eating, drinking, amusement, awaiting transportation, or similar uses; or (2) used as a special amusement building, regardless of occupant load.
- 2.1.2 **2018 International Building Code Section 303.1.1 Small buildings and tenant spaces.** A building or tenant space used for assembly purposes with an occupant load of less than 50 persons shall be classified as a Group B occupancy.

#### 3. BACKGROUND

- 3.1. The State of Georgia has adopted the 2018 Life Safety Code as the primary code for determining occupancy types, with the 2018 International Building Code as an approved supplemental code for the purpose of providing additional clarification. (2018 International Building Code – State of Georgia Amendments: Revised January 1, 2020)
- 3.2. Occupancies with a design occupant load of 50 (fifty) or more for the purposes of deliberation, worship, entertainment, eating, drinking, amusement, awaiting transportation, or similar uses of are classified as an Assembly occupancy within the 2012 Life Safety Code Section 3.3.196.2.
- 3.3. 2018 International Building Code Section 303.1.1 recognizes that assembly occupancies with a low design occupant load of less than 50 (fifty) pose a



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reduced life safety hazard to the occupants, and classifies these buildings or tenant spaces as Group B (Business) occupancies.

- 3.4. Previous interpretations were made, based on 2012 Life Safety Code Section A3.3.196.2, which in part states:

*Restaurants and drinking establishments with an occupant load of fewer than 50 persons should be classified as mercantile occupancies.*

- 3.5. 2018 Life Safety Code Section A3.3.196.2 is found within Annex A, which is titled as Explanatory Material. The preface to this section of the Life Safety Code reads as follows:

*Annex A is not a part of the requirements of this NFPA document but is included for informational purposes only. This annex contains explanatory material, numbered to correspond with the applicable text paragraphs.*

#### **4. INTREPRETATION / CLARIFICATION**

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- 4.1. 2018 Life Safety Code Section A3.3.196.2 is found within Annex A, which is titled as Explanatory Material, and is meant for informational purposes only. From a regulatory standpoint, this section of the 2018 Life Safety Code may not be used to set a prescriptive requirement for the determination of Assembly occupancies with a design occupant load of less than 50 (fifty)
- 4.2. Based on the use of the 2018 Life Safety Code as the primary adopted code for determining occupancy types, with the 2018 International Building Code as the State of Georgia recognized supplemental code. It is determined that Assembly occupancies with a design occupant load of 49 (forty-nine) or less met the prescriptive requirements of a Group B (Business) occupancy, as allowed for under 2018 International Building Code Section 303.1.1.
- 4.3. The Assembly occupancies with a design occupant load of less than 50 (fifty) shall meet the prescriptive requirements of the adopted codes for a Group B (Business) occupancy.

#### **5. SUMMATION**

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- 5.1 Assembly occupancies with a design occupant load of 49 (forty-nine) or less, as determined by 2018 Life Safety Code Section 7.3.1.2 shall be classified as Group B occupancies per 2018 International Building Code Section 303.1.1.



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- 5.2** This Group B occupancy determination shall extend to all adopted code that rely on occupancy type for the application of additional prescriptive requirements.
- 5.3** The building or area determined to be a Group B (Business) occupancy shall comply with all prescriptive requirements for that use. This includes but is not limited to fire protection, mechanical and plumbing systems.