



RETC-23

OKLAHOMA

Uniform Building Code Commission Technical Code Review Committee

Code Change Proposal Form

NOTE: This form and any attachments hereto are subject to the Oklahoma Open Records Act and may be disbursed, upon request, without further notice to the submitter.

INSTRUCTIONS:

1. Please type or print clearly.
2. Form must be signed. Any forms that are not signed or filled out completely, may not be considered.
3. Each requested change must be on a separate form.
4. If the space to show the proposed change or supporting information is not big enough to show the entire change, write the words "See Attached" in the space provided and submit the change on a separate page or document.

Contact Information:

Name Derrick Roberts

Address 6413 South Choctaw Road

City, State and Zip Choctaw, OK 73020

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Phone Number 405-423-5333

Financial Impacts:

Please provide the following information:

Who will be impacted by this change, (i.e. contractors, business or homeowners, specific trades, etc.)?

Electricians, Inspectors, Educators, Homeowners and Builders/Contractors.

What is the financial impact of this change?

Increase cost ☐ Decrease costs ☐ Keep Costs the Same ☒

What is the expected amount of the increase or decrease? _____

If this change increases the cost of construction, will it exceed \$1,000,000 over the course of five years?

Yes ☐ No ☒

Explain the method used to determine the economic impact. Please provide the sources used to determine the impact, in the explanation.

Code Change Information:

Which code needs to be revised? **410.16(A) & (D) E4003.12**

Which part of the code needs to be revised?

Section _____ Table _____ Figure _____ Page _____

Proposed Change:

Show the proposed new, revised, or deleted text in Legislative format. Line through text to be deleted and underline text to be added or revised.

Removal of NEC 410.16(A) & (D)

Supporting Information:

Please provide justification for the proposed change and clarify if it impacts life safety.

Please see attached

Signature: _____



Date: 5/29/2025

Send completed form to:

Oklahoma Uniform Building Code Commission
2401 N.W. 23 St, Ste 82, Oklahoma City, OK 73107
Or email to permitreporting@oubcc.ok.gov

Supporting Information

1. Obsolete Risk Basis

- The section was written to protect against **open incandescent lamps**, which are no longer standard.
- Modern enclosed LED lights emit **minimal heat**, have **sealed housings**, and are **not shock hazards** in residential closet installations.

2. Design Limitation Without Safety Justification

- These clearance rules restrict fixture placement in **small or custom closets**, where space is already limited.
- This leads to **reduced illumination**, or encourages homeowners to install **non-compliant solutions** to improve visibility.

3. Lack of Supporting Safety Data

- No injury or fire data exists showing safety incidents tied to properly installed enclosed LED luminaires in closets.
- In fact, misapplied rules may push lights into **less practical and potentially riskier positions**.

4. Redundancy Within the Code

- General luminaire safety requirements under **NEC Article 410** already address:
 - Proper mounting
 - Protection from mechanical damage
 - Compatibility with damp or enclosed environments
- These rules render 410.16(A) and (D) **redundant** in today's construction landscape.