

## MEMORANDUM

**To:** All Building and Fire Inspectors  
**From:** Christian Noles, P.E., Chief Fire Protection Engineer  
Barry Gupton, P.E., Chief Code Consultant  
NC Dept of Ins/OSFM, Dept of Engineering  
**Date:** Monday, February 23, 2004  
**Re:** Inspection Issues for Double-cylinder dead bolt locks.

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The purpose of this memo is to advise inspectors of their discretionary ability regarding locking arrangements.

Section 1003.3.1.8 of the 2002 edition of the North Carolina Building Code and the 2002 edition of the North Carolina Fire Prevention Code is a goal-based section, advising designers and inspectors that new locks cannot employ the use of a key, special knowledge or effort to leave the building. Existing locking arrangements are subject to the code in effect at the time the building was permitted.

Historically, there have been difficulties making security measures compatible with the intent of the code for the ability of egress. The new language in Section 1027 of the 2003 edition of the International Fire Code allows the code official to approve a security device that affects the means of egress. This section can be used as an alternative method in accordance with Section 205 of the North Carolina Administration and Enforcement Code.

Since new and existing locking arrangements cannot be regulated by a single code, enforcement of this requirement for the approval of different types of locks is at the discretion of the inspector within the bounds of the code. Provided that reasonable accommodations can be made by the owner to allow occupant egress (under the occupant's own ability) in a practical time period, the alternative method provides latitude to the code official to allow different locking arrangements. Consideration to locking arrangements should include the following:

- Does the locking arrangement require any unexpected physical ability for someone who has movement limitations (e.g. wheelchair or arthritis)?
- Can the locking arrangement be easily resolved, allowing an occupant to leave the facility in a reasonable amount of time?
- Is the locking arrangement obscured, requiring someone to find a "hidden" latch or knob?
- Is the locking device, used in a normal operation, located in a difficult location (e.g. at the top or bottom of the door)? Can it be relocated to an accessible location?

Should there be any question regarding these issues, please feel free to contact Barry Gupton at (919) 661-5880 x 232 or Chris Noles at (919) 661-5880 x223.