

DISABILITY AND COMMUNICATION ACCESS BOARD

1010 Richards Street, Rm. 118 • Honolulu, Hawai'i 96813
Ph. (808) 586-8121 (V) • Fax (808) 586-8129 • (808) 2044-2466 (VP)

NOTICE OF MEETING

Disability and Communication Access Board

Standing Committee on Facility Access Meeting

February 7, 2025

1:30 p.m.

The Disability and Communication Access Board will be meeting remotely using interactive conference technology. The public is welcome to participate as follows.

Public In-Person Meeting Location

Kamamalu Building
1010 Richards Street, Room 111A and 111B
Honolulu, HI 96813

Participate Virtually via Zoom

Click on the link below or copy and paste it into your browser window:
<https://us02web.zoom.us/j/87600594864> and enter Meeting ID: 876 0059 4864

To join by phone

Dial 1 253 205 0468 and Meeting ID: 876 0059 4864

Public Testimony

Oral testimony - Members of the public may present comment or testimony on each agenda item.

Written Testimony - To ensure the public as well as Committee members are able to review testimony prior to the meeting, written testimony should be submitted 48 hours prior to the scheduled meeting date and time. Written testimony may be submitted by one of the methods listed below:

- By email to: dcab@doh.hawaii.gov
- By U.S. Postal Mail:
Kirby Shaw, Disability and Communication Access Board, 1010 Richards Street, Room 118, Honolulu, HI 96813
- By facsimile to: (808) 586-8129

AGENDA

- I. Call to Order
Review Remote Meeting Procedures
 - This meeting is being recorded.
 - A quorum of Committee members is required to be visible on screen.
 - Raise hand to speak unless called upon.
 - Identify yourself before speaking.
- II. Roll Call/Introductions
- III. Statement from Public and Written Testimonies Submitted
- IV. Approval of Committee Meeting Minutes of May 3, 2024.
- V. Old Business
 - A. Document Reviews and Implementation of Fee Schedule – Update

Report on the amount of construction document review fees collected and the number of construction document reviews conducted for State and County projects between May 3, 2024 to February 6, 2025.
- VI. New Business
 - A. Interpretive Opinion

DCAB 2025-01 Signage Installation Height and Location – Clarifies the minimum mounting height for permanent room signage is to be taken from the finish floor surface to the baseline of braille characters.
- VII. Open Forum

Public comment on issues not on the agenda, for consideration for Committee agenda at the next meeting.
- VIII. Announcement of Next Meeting
- IX. Adjournment

If you require an auxiliary aid/service or other accommodation due to a disability, contact Cindy Omura at (808) 586-8121 and email at dcab@doh.hawaii.gov as soon as possible. Requests made as early as possible have a greater likelihood of being fulfilled.

Upon request, this notice is available in alternate/accessible formats.

The agenda and materials for this meeting are also available for inspection at DCAB's office located at 1010 Richards Street, Room 118, Honolulu, Hawaii 96813 and on DCAB's website at: <https://health.hawaii.gov/dcab/dcab-agendas-and-minutes/>.



APPLICATION FORM

DISABILITY AND COMMUNICATION ACCESS BOARD

1010 Richards Street, Room 118, Honolulu, HI 96813 V: (808) 586-8121 Fax: (808) 586-8129

Date: February 7, 2025

Applicant Information

Company: Disability and Communication Access Board

Address: 1010 Richards Street, Room 118

City: Honolulu State: Hawaii Zip: 96813

Contact: Glenn Arakaki Phone: 808-586-8121

Title: Facility Access Specialist II Fax: 808-586-8129

Site Specific Alternate Design Interpretive Opinion Design Specification (choose one):
 ADOPTION AMENDMENT REPEAL

Guidelines: ADAAG Section(s) 703.4.1

Description: ADAAG 703.4.1 provides the minimum and maximum sign installation heights above the finish floor or ground surface. Tactile characters on signs shall be located 48" minimum above the finish floor or ground surface, measured from the baseline of the lowest tactile character and 60" maximum above the finish floor or ground surface, measured from the baseline of the highest tactile character. Is braille considered to be a tactile character and therefore the 48" minimum dimension shall be measured to the baseline of the braille characters?

Site Specific Alternate Design

Project Title: _____

Job No.: _____ T.M.K.: _____

Agency: _____

Address: _____ County: _____

Contact: _____ Phone: _____

Title: _____ Fax: _____

I hereby certify that all statements in this application are true and correct to the best of my knowledge, and I agree and understand that any misstatements of material facts herein may be grounds for *site specific alternate design* denial. I understand that all costs related to the processing of this application for a site specific alternate design by the Disability and Communication Access Board (DCAB), including processing fees, proceeding costs and legal notice publications, will be billed directly to me. In addition, I agree to submit all public notices to the DCAB for review, approval and filing for publication. Further, I understand that all materials filed with or presented to the DCAB will be retained and will be considered public documents under HRS §92F and shall be available for inspection by the public during public hearing as well as after a final decision is made.

Signature: _____ Date: _____

DOCKET NO: DCAB 2025-01

ADAAG 703.4.1 provides the minimum and maximum sign installation heights above the finish floor or ground surface. Tactile characters on signs shall be located 48-inches maximum above the finish floor or ground surface, measured from the baseline of the lowest tactile character and 60-inches maximum above the finish floor or ground surface, measured from the baseline of the highest tactile character. Is braille considered a tactile character and therefore the 48-inch minimum dimension shall be measured to the baseline of the braille character?

BACKGROUND:

ADAAG Figure 703.4.1 illustrates the 48-inch minimum sign mounting height dimension from the baseline of the written raised alphabet character to the finish floor or ground surface. The U.S. Access Board's ADA Guide's illustration for ADAAG 703.4.1 shows the 48-inch minimum height dimension to the baseline of the braille character.

ANALYSIS: (For more background information see ATTACHED 'Supporting Research'.)

ADAAG 104.3 states that unless specifically stated otherwise, figures are provided for informational purposes only.

The definition of "Tactile" (106.5) is an object that can be perceived using the sense of touch.

The definition of "Characters" (106.5) is letters, numbers, punctuation marks and typographic symbols.

Braille dots are both tactile and characters. Where provided, braille would be considered the "lowest tactile character".

RECOMMENDED RULING – 2025-01 Signage Installation Height and Location

ADAAG Section 703.4.1 Installation Height and Location

Braille is considered a tactile character. Where braille is provided on signs, the minimum 48-inch (1220 mm) height dimension shall be measured from the baseline of the braille character to the finish floor or ground surface.

[Ruling: 02/XX/2025] (Auth and Imp: HRS §103-50)

SUPPORTING RESEARCH:

The 2004 ADAAG Chapters 1 through 10 of the Americans with Disabilities Act, Architectural Barriers Act, Accessibility Guidelines, published by the U.S. Access Board, were adopted by DCAB. The guidelines contain scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities. These scoping and technical requirements are to be applied during the design, construction, and alteration of such buildings and facilities.

103 Equivalent Facilitation

Nothing in these requirements prevents the use of designs, products, or technologies as alternatives to those prescribed, provided they result in substantially equivalent or greater accessibility and usability.

The 2004 ADAAG contains “advisory” information that is meant to assist in the use of its ADA/ABA AG. It explains some of the basic considerations for accessible design and clarifies specific ADAAG provisions in an effort to address frequently asked questions. Advisory information is provided in the form of recommendations that are optional and go beyond the minimum required by ADAAG.

Advisory 103 Equivalent Facilitation. The responsibility for demonstrating equivalent facilitation in the event of a challenge rests with the covered entity. With the exception of transit facilities, which are covered by regulations issued by the Department of Transportation, there is no process for certifying that an alternative design provides equivalent facilitation.

2010 ADA Standards:

216 Signs

216.1 General. Signs shall be provided in accordance with 216 and shall comply with 703.

EXCEPTIONS:

1. Building directories, menus, seat and row designations in assembly areas, occupant names, building addresses, and company names and logos shall not be required to comply with 216.
2. In parking facilities, signs shall not be required to comply with 216.2, 216.3, and 216.6 through 216.12.
3. Temporary, 7 days or less, signs shall not be required to comply with 216.
4. In detention and correctional facilities, signs not located in public use areas shall not be required to comply with 216.

216.2 Designations. Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.

EXCEPTION: Exterior signs that are not located at the door to the space they serve shall not be required to comply with 703.2.

216.4 Means of Egress. Signs for means of egress shall comply with 216.4.

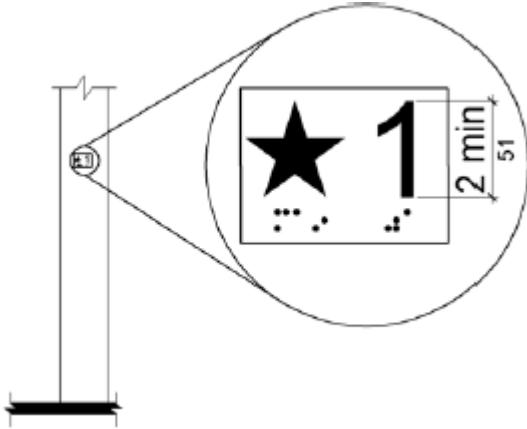
216.4.1 Exit Doors. Doors at exit passageways, exit discharge, and exit stairways shall be identified by tactile signs complying with 703.1, 703.2, and 703.5.

407 Elevators

407.2.3 Hoistway Signs. Signs at elevator hoistways shall comply with 407.2.3.

407.2.3.1 Floor Designation. Floor designations complying with 703.2 and 703.4.1 shall be provided on both jambs of elevator hoistway entrances. Floor designations shall be provided in both tactile characters and braille. Tactile characters shall be 2 inches (51 mm) high minimum. A tactile star shall be provided on both jambs at the main entry level.

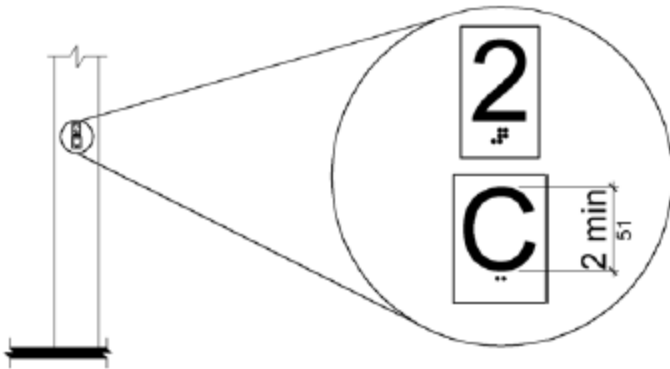
Figure 407.2.3.1



Floor Designations on Jambs of Elevator Hoistway Entrances

407.2.3.2 Car Designations. Destination-oriented elevators shall provide tactile car identification complying with 703.2 on both jambs of the hoistway immediately below the floor designation. Car designations shall be provided in both tactile characters and braille. Tactile characters shall be 2 inches (51 mm) high minimum.

Figure 407.2.3.2



Car Designations on Jambs of Destination-Oriented Elevator Hoistway Entrances

703 Signs

703.1 General. Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided.

703.2 Raised Characters. Raised characters shall comply with 703.2 and shall be duplicated in braille complying with 703.3. Raised characters shall be installed in accordance with 703.4.

703.2.1 Depth. Raised characters shall be 1/32 inch (0.8 mm) minimum above their background.

703.2.2 Case. Characters shall be uppercase.

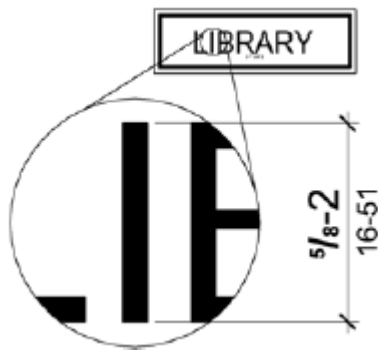
703.2.3 Style. Characters shall be sans serif. Characters shall not be italic, oblique, script, highly decorative, or of other unusual forms.

703.2.4 Character Proportions. Characters shall be selected from fonts where the width of the uppercase letter “O” is 55 percent minimum and 110 percent maximum of the height of the uppercase letter “I”.

703.2.5 Character Height. Character height measured vertically from the baseline of the character shall be 5/8 inch (16 mm) minimum and 2 inches (51 mm) maximum based on the height of the uppercase letter “I”.

EXCEPTION: Where separate raised and visual characters with the same information are provided, raised character height shall be permitted to be 1/2 inch (13 mm) minimum.

Figure 703.2.5



Height of Raised Characters

703.2.6 Stroke Thickness. Stroke thickness of the uppercase letter “I” shall be 15 percent maximum of the height of the character.

703.2.7 Character Spacing. Character spacing shall be measured between the two closest points of adjacent raised characters within a message, excluding word spaces. Where characters have rectangular cross sections, spacing between individual raised characters shall be 1/8 inch (3.2 mm) minimum and 4 times the raised character stroke width maximum. Where characters have other cross sections, spacing between individual raised characters shall be 1/16 inch (1.6 mm) minimum and 4 times the raised character stroke width maximum at the base of the cross sections, and 1/8 inch (3.2 mm) minimum and 4 times the raised character stroke width maximum at the top of the cross sections. Characters shall be separated from raised borders and decorative elements 3/8 inch (9.5 mm) minimum.

703.2.8 Line Spacing. Spacing between the baselines of separate lines of raised characters within a message shall be 135 percent minimum and 170 percent maximum of the raised character height.

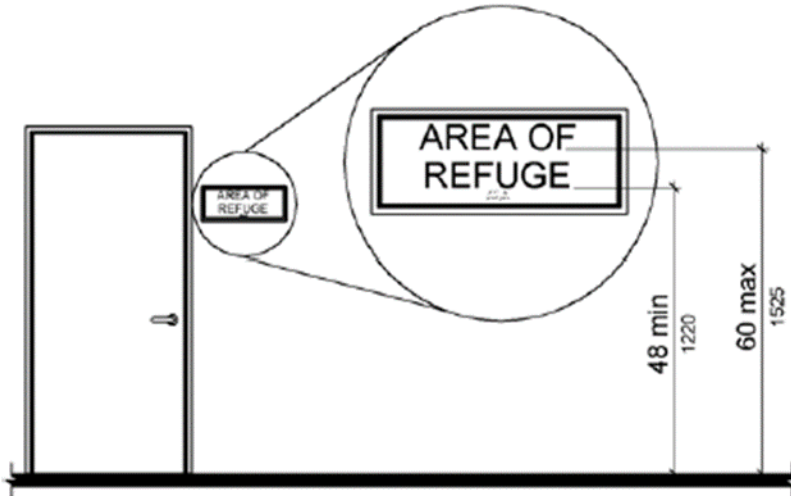
703.3 Braille. Braille shall be contracted (Grade 2) and shall comply with 703.3 and 703.4.

703.4 Installation Height and Location. Signs with tactile characters shall comply with 703.4.

703.4.1 Height Above Finish Floor or Ground. Tactile characters on signs shall be located 48 inches (1220 mm) minimum above the finish floor or ground surface, measured from the baseline of the lowest tactile character and 60 inches (1525 mm) maximum above the finish floor or ground surface, measured from the baseline of the highest tactile character.

EXCEPTION: Tactile characters for elevator car controls shall not be required to comply with 703.4.1.

Figure 703.4.1

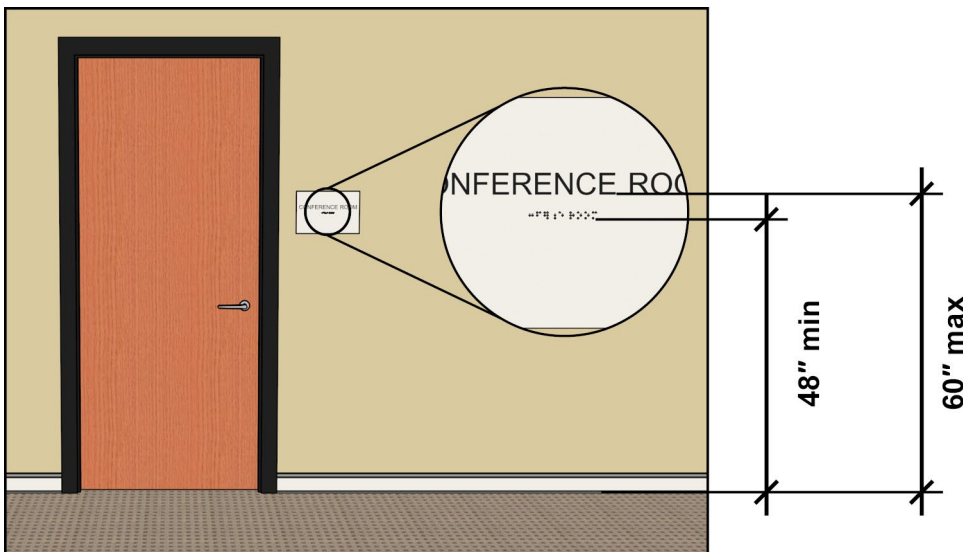


Height of Tactile Characters Above Finish Floor or Ground

U.S. Access Board ADA Guides:

703.4 Installation Height and Location

Raised characters and braille on signs must be located 48 inches minimum above the finish floor or ground surface, measured from the baseline of the lowest tactile character, and 60 inches maximum above the finish floor or ground surface, measured from the baseline of the highest tactile character. This location is convenient for tactile reading.



U.S. Access Board response: 12/06/2024: Unless specifically stated otherwise, figures are provided for informational purposes only (104.3). The requirement in 703.4.1 refers to “tactile characters”. Each braille cell is a character and braille is tactile. The definition of “characters” in 106.5 is “Letters, numbers, punctuation marks and typographic symbols”. Each braille cell represents a letter, number, punctuation mark or typographic symbols, so they are “characters”. The height requirement applies to “lowest tactile character”, which includes braille.

Department of Justice response: 12/13/2024: The Department of Justice views braille as a tactile character, and therefore, where braille is provided on signage, the minimum 48-inch height dimension shall be measured from the baseline of braille to the finish floor or ground surface.