

---

**Building Codes Division****Statewide Code Interpretation**

*Working with Oregonians  
to ensure safe building  
construction while  
supporting a positive  
business climate.*

**June 6, 2006****No: 2004 OSSC 1109.10, 1109.23  
2004 Oregon Structural Specialty Code**

---

**Code Section:** 1109.10, 1109.23**Code Edition:** 2004 Oregon Structural Specialty Code (OSSC)**Date:** June 6, 2006**Subject:** Scope of dressing and fitting room provisions**Question:** Does providing a shower in a restroom invoke the “adjacent bench” requirements of Section 1109.23 of the OSSC for dressing and fitting rooms?**Answer:** No. A single-user restroom provided with a shower is not considered a “dressing or fitting room” for the purposes of Section 1109.23. An adjacent bench is not required by merely providing a shower in a restroom.**Analysis:** Section 1109.10.1 States in part: “*Bathrooms, toilet rooms, bathing facilities and shower rooms shall be designed according to this section*”. There are no references to 1109.23 or requirements for accessible benches contained in Section 1109.10.

1109.23 provides the requirements for rooms or spaces that are for the purpose of changing or dressing (i.e. swimming pool locker rooms, fitting rooms in department stores, etc.).

Oregon’s Chapter 11 of the OSSC is based on the Federal ADAAG standard with certain requirements in the OSSC being more restrictive. Oregon’s code is not more restrictive than the Federal standards in this application.

Editorial Note: ORS 447.220 directs the Department of Consumer and Business Services to adopt accessibility guidelines that are consistent with the Americans with Disabilities Act. In keeping with this directive, BCD staff recently conferred with both the US Access Board (promulgators of the ADA Architectural Guidelines) and the US Department of Justice. Both entities concurred there is no requirement in the ADAAG to comply with dressing and fitting room requirements by the installation of a shower in a bathing room.

**Contact:**

Richard S. Rogers  
Structural Program Chief  
(503) 378-4472  
richard.rogers@state.or.us

