



**SUPPLEMENTARY SUBMISSION TO THE  
ECONOMICS AND INDUSTRY STANDING  
COMMITTEE**

**INQUIRY INTO SHORT-STAY  
ACCOMMODATION**

**JUNE 2019**

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## Executive Summary

Shelter WA and People with Disabilities WA thank you for the opportunity to make a supplementary submission to the Inquiry into Short-Stay Accommodation following the public hearing on 19<sup>th</sup> June 2019.

This supplementary submission provides further information which addresses issues the Committee has considered throughout the public hearing process.

## Shelter WA

Shelter WA is the independent peak body, based in Perth, Western Australia, that advocates for social and affordable housing and ending homelessness.

Our vision is that all people living in Western Australia have housing that enables them to thrive.

Shelter WA brings together a strong coalition committed to diverse and affordable housing choice for all. With a focus on housing for people on low to moderate incomes and groups that experience housing insecurity.

Shelter WA undertakes research and policy development, engagement, and advocacy to drive solutions to build an effective housing system and alleviate housing-related poverty.

Housing unlocks opportunity, enhances health and well-being, provides access to education and employment options. It enables people to fully participate in community life. We believe housing is a basic human right. Everybody has a right to a place to call home.

**Our Vision:** All people living in Western Australia have housing that enables them to thrive.

## People with Disabilities WA

Since 1981 People with Disabilities WA (PwDWA) has been the peak disability consumer organisation representing the rights, needs, and equity of all Western Australians with a physical, intellectual, neurological, psychosocial, or sensory disability via individual and systemic advocacy.

We provide access to information, and independent individual and systemic advocacy with a focus on those who are most vulnerable.

PwDWA is run by and for people with disabilities and aims to empower the voices of all people with disabilities in Western Australia



## Regulating short-term letting through imposing time limits – International approaches

During the hearing, the Committee was interested in examples that have taken notificatory approaches in regard to limiting the number of days that dwellings are allowed to be used as short-term accommodation.

Shelter WA and People with Disabilities WA would like to highlight three examples, where such an approach has been taken.

### *Amsterdam*

Short-term letting in Amsterdam is regulated under the Housing Regulation Amsterdam 2016, which allows a resident of Amsterdam to short-term let the whole of their dwelling for not more than 30 days in a year. Each letting must be notified to the Municipality prior to commencement; must not be for a period of less than seven days; and must not allow more than four persons to occupy premises under a short-term letting.

A resident may short-term let part of their dwelling for a longer period if they are registered as a bed and breakfast. Registration in this regard is free of charge, however it obliges the resident to participate in inspections from the municipality and to remain in occupation during lettings. What is important to note though is that the resident-proprietor of a registered bed and breakfast cannot short-term let their dwelling in its entirety.

### *Paris*

In France, dwellings that an individual occupies not less than eight months in a year are regarded as their primary residence (*Code of Construction and Housing*). The City of Paris is empowered to require residents to notify an authority before short-term letting the whole or part of their primary residence. However, the implicit limitation is that the dwellings have to be their primary residence- so if a resident is letting out their dwelling or parts of it for more than 120 days per year would negate this status. Upon notifying the municipal government, the host receives a registration number that must be included in all advertisements.

Dwellings that are occupied for less than eight months in a year are regarded as a 'secondary home', and short-term letting is subject to stricter legislative and administrative measures. Short-term letting of the whole of a secondary home is classified as a change of use, for which the owner must apply for authorisation. The penalty for unauthorised change of use is up to € 50,000 per dwelling, and € 10,000 per square metre per day of unauthorised use. In order



to short-term let rooms in a secondary home, the owner must declare the use to the municipal government and meet the requirements for 'guest rooms' under the *Tourism Code*.

### *San Francisco*

San Francisco regulates short-term letting under the *San Francisco Administrative Code*. A resident may short-term let a dwelling if they have first registered with the Office of Short-Term Rentals, which in turn issues a certificate and reference number for use in advertisements, as well as with the City Treasurer as a business for tax purposes. However, this only allows the resident to let their own 'permanent residence', which means that they have to occupy the dwelling for at least 275 nights per year. Following on from this, whole of premises lettings must not exceed 90 nights per year.

## **Accessibility and approaches to guarantee accessibility in the broader housing sector**

As pointed out in the submission by People with Disabilities Western Australia, currently residential dwellings are not required to provide any form of universal disability access. Therefore, the majority of short stay accommodation, that is advertised on sharing economy platforms such as Airbnb, is not accessible for people with mobility disability, and most likely not safe for people with other disabilities.

Shelter WA, People with Disabilities WA and REIWA have acknowledged that accessibility is a wide-ranging issue within the housing sector, particularly in the private rental market. Together, we are currently working on facilitating greater access and housing choice for people with disabilities.

Through discussion with the disability sector, we identified a significant barrier for people with disabilities, is accessing housing within the private rental market. Specifically, there is no easy way to identify an accessible rental property. In response, Shelter WA and REIWA are collaborating on a new system to enable vacant rental properties advertised on reiwa.com to be identified easily through an 'accessibility button' on the listing portal site.

At present, when properties are listed on online portals like reiwa.com, there is no feature to search for properties with appropriate accessibility features. In our discussions with the Real Estate Institute Western Australia (REIWA), we have gained their commitment to create a search option button as a business as usual feature on reiwa.com. Through research and a partnership with People with Disabilities WA (PwDWA), a list of accessible criteria has been created that will inform the development of the accessibility button.



This list of criteria is based on the Livable Housing Guidelines and Universal Housing Design Guidelines and could be equally used as a framework in identifying accessible short-stay accommodation on platforms like Airbnb. The list of criteria has been attached to this supplementary submission (Appendix I).

### **Discrimination in regard to accessibility**

As People with Disabilities WA has highlighted in the hearing on the 19<sup>th</sup> of June 2019, short-term accommodation, particularly in residential apartment complexes, could lead to discrimination.

There is evidence, of discrimination cases in regard to accessibility to premises in a strata title building (*Owners Corporation v Black* [2018] VSC 337 - 21 Jun 2018).

This could also be the case if a person rented a short stay unit in a building but not all the complex/apartment building was accessible. The person with disability could claim discrimination as the services are not accessible even if the apartment/unit was. Also, if a house is advertised as accessible but it does not meet requirements and it is a 'goods or service' being offered – short stay rental – then a person could put in a complaint. Access to premises standards are in the building code but do not cover private residential housing. However, one could argue, that short stay accommodation platforms are offering a service for the public in private residential dwellings.

Currently the Airbnb website allows for the host to put forward their accessibility claims. Unless a host is a person with disability relating to the access they are talking about, or has had an access audit against these standards, then this information is not able to be verified by a trusted source.

However, there are currently innovative projects available that promote accessible house sharing ([www.matchinghouses.com](http://www.matchinghouses.com)).

### **Concluding remarks**

Shelter WA and People with Disabilities Western Australia look forward to working with the Economics and Industry Standing Committee and the Western Australian government in regard to short- term accommodation and would be pleased to engage in discussions and provide additional information which would be helpful for the Committee's deliberations.

**Table 1: Physical accessible housing criteria – private rental market**

Category	Performance statement	Performance indicator	Technical characteristics
<i>Dwelling access</i>	There is a safe, continuous, step-free pathway from the street entrance and/or parking area to a dwelling entrance that is level.	<ul style="list-style-type: none"> <li>• Easy access from both the street and car parking spaces in all weather and light conditions is provided.</li> <li>• Access pathways are constructed from well drained, solid, non-slip surfaces.</li> <li>• Paths and entries are protected from the weather.</li> <li>• Stairs are avoided and ramps are in place if essential.</li> </ul>	<p>The path of travel of travel should have a minimum clear width of 1000mm and have:</p> <ul style="list-style-type: none"> <li>• no steps,</li> <li>• an even, firm, slip resistant surface,</li> <li>• a crossfall of not more than 1:40,</li> <li>• a maximum pathway slope of 1:14.</li> </ul>

<p><i>Dwelling entrance</i></p>	<p>There is at least one level (step-free) entrance into the dwelling to enable home occupants to easily enter and exit the dwelling.</p>	<ul style="list-style-type: none"> <li>• The entry should provide a level sheltered landing that is dimensioned for wheelchair manoeuvrability and is adequately lit for visibility from inside the home.</li> <li>• Entry door locks and lever handles should be fitted at appropriate heights and be able to be used with one hand.</li> </ul>	<p>The dwelling should provide an entrance door with -</p> <ul style="list-style-type: none"> <li>• a minimum clear opening width of 820mm,</li> <li>• a level (step-free) transition and threshold,</li> <li>• reasonable shelter from the weather.</li> </ul> <p>A level landing area of at least 1200mmx1200mm should be provided at the level entrance door.</p> <p>A level landing area at the entrance door should be provided on the arrival side of the door to allow a person to safely stand and then open the door.</p>
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<p><i>Internal doors and corridors</i></p>	<p>Internal doors and corridors facilitate comfortable and unimpeded movement between spaces.</p>		<p>Internal doors should have a minimum unobstructed width of 820mm and passageways a minimum of 1000mm.</p>
<p><i>Toilet</i></p>	<p>The ground (or entry) level has a toilet to support easy access for home occupants (and visitors).</p>		<p>Dwellings should have a toilet on the ground (or entry) level that provides:</p> <ul style="list-style-type: none"> <li>• a minimum clear width of 900mm between the walls of the bathroom if located in a separate room;</li> <li>• a minimum 1200mm clear circulation space forward of the toilet pan exclusive of the swing of the door.</li> <li>• an internal door that should have a minimum unobstructed width of 820mm.</li> </ul>
<p><i>Shower</i></p>	<p>The bathroom and shower are designed for easy and independent access for all home occupants.</p>		<p>The bathroom should feature a slip-resistant, hobless shower recess.</p> <p>The shower recess should be ideally located in the corner of the room and have grabrails installed.</p>



			The bathroom should have a door with a minimum unobstructed width of 820mm.
<i>Kitchen space</i>	The kitchen space is designed to support ease of movement between fixed benches and to support easy adaptation.		<p>The kitchen space should be designed to support ease of movement and adaptation with:</p> <ul style="list-style-type: none"> <li>• at least 1200mm clearance in front of fixed benches and appliances;</li> <li>• slip resistant flooring.</li> </ul>

<p><i>Laundry space</i></p>	<p>The laundry space is designed to support ease of movement between fixed benches and to support easy adaptation.</p>		<p>A minimum circulation space 1550mm deep in front or beside appliances.</p> <p>Sufficient storage opportunities at a maximum height of 1200mm.</p>
<p><i>Family/living space</i></p>	<p>The family/ living space features clear space to enable the home occupant to move in and around the room with ease.</p>		<p>Australian Standards recommend:</p> <ul style="list-style-type: none"> <li>• a minimum of four double electrical outlets;</li> </ul> <p>a telephone outlet adjacent to an electrical outlet;</p> <ul style="list-style-type: none"> <li>• two TV antennae outlets, all located at appropriate heights;</li> <li>• clear circulation space within the room of at least 2250mm diameter for wheelchair manoeuvrability.</li> </ul>

<p><i>Bedroom space</i></p>	<p>There is a space on the ground ( or entry) level that can be used as a bedroom.</p>		<p>The dwelling should feature a space that:</p> <ul style="list-style-type: none"> <li>• is of at least 10 m2 clearance exclusive of wardrobes; skirtings and wall lining;</li> <li>• provides for a minimum path of travel of at least 1000mm on at least one side of the bed.</li> </ul>
<p><i>Switches and powerpoints</i></p>	<p>Light switches and powerpoints are located at heights that are easy to reach for all home occupants.</p>		<p>Electrical outlets are placed at a minimum of 600mm above the floor; for light switches and other controls the ideal height range is 900 - 1100mm.</p>



<p><i>Door and tap hardware</i></p>	<p>Home occupants are able to easily and independently open and close doors, and safely use tap hardware.</p>	<p>Entry door locks and lever handles should be fitted at appropriate heights and be able to be used with one hand.</p> <p>Circulation space around doors to allow wheelchair access is provided, with special attention given to providing enough space to reach and operate the door lever.</p>	<p>Doorways should feature door hardware installed at between 900mm - 1100mm above the finished floor.</p>
<p><i>Window sills</i></p>	<p>Window sills are installed at a height that enables home occupants to view the outdoor space from either a seated or standing position.</p>	<p>Window sills should be low enough to allow unobstructed views to the exterior from standing, sitting and lying positions where appropriate.</p>	
<p><i>Flooring</i></p>	<p>Floor coverings are slip-resistant to reduce the likelihood of slips, trips and falls in the home.</p>		<p>Where different floor surfaces meet, they need to be level and fitted with cover strips to prevent tripping.</p>

<p>Site</p>	<p>Activities such as mail collection, rubbish storage, car parking and enjoyment of outdoor spaces must be accessible.</p>	<ul style="list-style-type: none"> <li>• Rubbish bins, recycling storage, letterboxes, clotheslines and garden tool storage are accessible along paths.</li> <li>• Access and circulation space to external areas such as patios and terraces is provided.</li> <li>• Private, sheltered areas with access to northern sun in winter, visible from inside the home, is provided.</li> <li>• Car parking close to the entry with at least one covered parking space sized to enable wheelchair access is located.</li> <li>• Electronically operated garage doors are installed.</li> </ul>	
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**Table 2: Physical accessible housing criteria- private rental market - sorted by LHG levels**

Category	Silver Level	Gold Level	Platinum Level
<i>Dwelling access</i>	<ol style="list-style-type: none"> <li>1. Provide a safe, continuous step-free pathway from the front boundary of the property to an entry door to the dwelling.</li> <li>2. The path of travel should have a minimum clear width of <b>1000mm</b> and have:               <ol style="list-style-type: none"> <li>a. No steps;</li> <li>b. An even, firm, slip resistant surface;</li> <li>c. A crossfall of not more than 1:40;</li> <li>d. A maximum pathway slope of 1:14.</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. Provide a safe, continuous step-free pathway from the front boundary of the property to an entry door to the dwelling.</li> <li>2. The path of travel should have a minimum clear width of <b>1100mm</b> and have:               <ol style="list-style-type: none"> <li>a. No steps;</li> <li>b. An even, firm, slip resistant surface;</li> <li>c. A crossfall of not more than 1:4</li> <li>d. A maximum pathway slope of 1:14.</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. Provide a safe, continuous step-free pathway from the front boundary of the property to an entry door to the dwelling.</li> <li>2. The path of travel should have a minimum clear width of <b>1200mm</b> and have:               <ol style="list-style-type: none"> <li>a. No steps;</li> <li>b. An even, firm, slip resistant surface;</li> <li>c. A crossfall of not more than 1:4</li> <li>d. A maximum pathway slope of 1:14.</li> </ol> </li> </ol>
<i>Dwelling entrance</i>	<ol style="list-style-type: none"> <li>1. The dwelling should provide an entrance door with:</li> </ol>	<ol style="list-style-type: none"> <li>1. The dwelling should provide an entrance door with:</li> </ol>	<ol style="list-style-type: none"> <li>1. The dwelling should provide an entrance door with:</li> </ol>

	<ul style="list-style-type: none"> <li>a. A minimum clear opening width of <b>820mm</b></li> <li>b. A level transition and threshold;</li> <li>c. Reasonable shelter from the weather.</li> </ul> <p>2. A level landing area of at least <b>1200mm x 1200mm</b> should be provided at the level entrance door. A level landing area at the entrance door should be provided on the arrival side of the door to allow a person to safely stand and then open the door.</p>	<ul style="list-style-type: none"> <li>a. A minimum clear opening width of <b>850mm</b></li> <li>b. A level transition and threshold;</li> <li>c. Reasonable shelter from the weather.</li> </ul> <p>2. A level landing area of at least <b>1350mm x 1350mm</b> should be provided at the level entrance door. A level landing area at the entrance door should be provided on the arrival side of the door to allow a person to safely stand and then open the door.</p>	<ul style="list-style-type: none"> <li>a. A minimum clear opening width of <b>900mm</b></li> <li>b. A level transition and threshold;</li> <li>c. Reasonable shelter from the weather.</li> </ul> <p>2. A level landing area of at least <b>1500mm x 1500mm</b> should be provided at the level entrance door. A level landing area at the entrance door should be provided on the arrival side of the door to allow a person to safely stand and then open the door.</p>
<i>Internal doors &amp; corridors</i>	<p>1. Doorways to rooms used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes should provide:</p> <ul style="list-style-type: none"> <li>a. A minimum clear opening width of <b>820mm.</b></li> </ul>	<p>1. Doorways to rooms used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes should provide:</p> <ul style="list-style-type: none"> <li>a. A minimum clear opening width of <b>850mm.</b></li> </ul>	<p>1. Doorways to rooms used for living, dining, bedroom, bathroom, kitchen, laundry and sanitary compartment purposes should provide:</p> <ul style="list-style-type: none"> <li>a. A minimum clear opening width of <b>900mm.</b></li> </ul>

	<ul style="list-style-type: none"> <li>b. A level transition and threshold.</li> <li>2. Internal corridors to the doorways should provide a minimum clear width of <b>1000mm</b>.</li> </ul>	<ul style="list-style-type: none"> <li>b. A level transition and threshold.</li> <li>2. Internal corridors to the doorways should provide a minimum clear width of <b>1200mm</b>.</li> </ul>	<ul style="list-style-type: none"> <li>b. A level transition and threshold.</li> <li>2. Internal corridors to the doorways should provide a minimum clear width of <b>1200mm</b>.</li> </ul>
<i>Toilet</i>	<ul style="list-style-type: none"> <li>1. Dwellings should have a toilet that provides: <ul style="list-style-type: none"> <li>a. A minimum clear width of <b>900mm</b> between the walls of the bathroom if located in a separate room;</li> <li>b. A minimum <b>1200mm</b> clear circulation space forward of the toilet pan exclusive of the swing of the door.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>1. Dwellings should have a toilet that provides: <ul style="list-style-type: none"> <li>a. A minimum clear width of <b>1200mm</b> between the walls of the bathroom if located in a separate room;</li> <li>b. A minimum <b>1200mm</b> clear circulation space forward of the toilet pan exclusive of the swing of the door.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>1. Dwellings should have a toilet that provides: <ul style="list-style-type: none"> <li>a. A minimum clear width of <b>1200mm</b> between the walls of the bathroom if located in a separate room;</li> <li>b. A minimum <b>1200mm</b> clear circulation space forward of the toilet pan exclusive of the swing of the door.</li> <li>c. A toilet seat positioned between <b>450mm – 460mm</b> from the nearest wall as measured from</li> </ul> </li> </ul>



			<p>the centre line of the toilet;</p> <p>d. <b>600mm</b> minimum clearance forward of the cistern measured from the front of the cistern to the front of the toilet seat;</p> <p>e. A height for the seat of between <b>460mm – 480mm</b> above the finished floor level.</p>
<p><i>Shower</i></p>	<ol style="list-style-type: none"> <li>1. The bathroom should feature a slip resistant, hobless shower recess.</li> <li>2. The shower recess should be located in the corner of the room to enable the installation of grabrails at a future date.</li> </ol>	<ol style="list-style-type: none"> <li>1. The bathroom should feature a slip resistant, hobless shower recess.</li> <li>2. The shower recess should be located in the corner of the room to enable the installation of grabrails at a future date.</li> <li>3. The shower should:             <ol style="list-style-type: none"> <li>a. Provide minimum dimensions of</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. The bathroom should feature a slip resistant, hobless shower recess.</li> <li>2. The shower recess should be located in the corner of the room to enable the installation of grabrails at a future date.</li> <li>3. The shower should:             <ol style="list-style-type: none"> <li>a. Provide minimum dimensions of</li> </ol> </li> </ol>

		<p><b>900mm x 900 mm;</b></p> <p>b. Provide a clear space of at least <b>1200mm x 1200mm</b> forward of the shower recess entry.</p>	<p><b>1160mm x 1100 mm;</b></p> <p>b. Provide a clear space of at least <b>1600mm x 1400mm</b> forward of the shower recess entry.</p>
<i>Kitchen space</i>	No requirements.	<p>1. The kitchen space should be designed to support ease of movement and adaptation with:</p> <ul style="list-style-type: none"> <li>a. At least <b>1200mm</b> clearance in front of fixed benches and appliances;</li> <li>b. Slip resistant flooring.</li> </ul>	<p>1. The kitchen space should be designed to support ease of movement and adaptation with:</p> <ul style="list-style-type: none"> <li>a. At least <b>1550mm</b> clearance in front of fixed benches and appliances;</li> <li>b. Slip resistant flooring;</li> <li>c. Task lighting installed above workspaces.</li> </ul>
<i>Laundry space</i>	No requirements.	<p>1. The laundry space should be designed to support ease of movement and adaptation with:</p> <ul style="list-style-type: none"> <li>a. At least <b>1200mm</b> clear width</li> </ul>	<p>1. The laundry space should be designed to support ease of movement and adaptation with:</p> <ul style="list-style-type: none"> <li>a. At least <b>1550mm</b> clear width</li> </ul>

		<p>provided in front of fixed benches and appliances.</p> <p>b. Slip resistant flooring.</p>	<p>provided in front of fixed benches and appliances.</p> <p>b. Slip resistant flooring.</p>
<i>Bedroom space</i>	No requirements.	<p>1. The dwelling should feature a space that:</p> <p>a. Is of at least <b>10m<sup>2</sup></b> clearance;</p> <p>b. Provides for a minimum path of travel of at least <b>1000mm</b> on at least one side of the bed.</p>	<p>1. The dwelling should feature a space that:</p> <p>a. Provides a space of at least <b>1540mm x 2070mm</b> on the side on the bed that is closest to the door;</p> <p>b. Provides for a minimum path of travel of <b>1000mm</b> on the remaining side of the bed.</p> <p>c. It should be assumed that the bed would be a queen size.</p>

<p><i>Family / living space</i></p>	<p>No requirements.</p>	<p>No requirements.</p>	<ol style="list-style-type: none"> <li>1. The family/living room should accommodate a free space, minimum <b>2250mm</b> in diameter, to enable ease of movement clear of furniture.</li> </ol>
<p><i>Switches and powerpoints</i></p>	<p>No requirements.</p>	<ol style="list-style-type: none"> <li>1. Light switches should be positioned in a consistent location:             <ol style="list-style-type: none"> <li>a. Between <b>900mm – 1100 mm</b> above the finished floor level;</li> <li>b. Horizontally aligned with the door handle at the entrance to a room.</li> </ol> </li> <li>2. Powerpoints should be installed not lower than <b>300mm</b> above the finished floor level.</li> </ol>	<ol style="list-style-type: none"> <li>1. Light switches should be positioned in a consistent location:             <ol style="list-style-type: none"> <li>a. Between <b>900mm – 1100 mm</b> above the finished floor level;</li> <li>b. Horizontally aligned with the door handle at the entrance to a room.</li> </ol> </li> <li>2. Powerpoints should be installed not lower than <b>300mm</b> above the finished floor level.</li> <li>3. Light and powerpoint switches should be rocker action, toggle or push pad in design with a</li> </ol>

			recommended width of <b>35mm.</b>
<i>Door and tap hardware</i>	No requirements.	1. Doorways should feature door hardware installed at between 900mm – 1100mm above the finished floor.	<ol style="list-style-type: none"> <li>1. Doorways should feature door hardware installed at between 900mm – 1100mm above the finished floor.</li> <li>2. Doorways should feature lever or D-pull style door hardware;</li> <li>3. Basins, sinks and tubs should feature lever or capstan style tap hardware with a central spout.</li> </ol>
<i>Window sills</i>	No requirements.	No requirements.	<ol style="list-style-type: none"> <li>1. Window sills in living areas and bedroom spaces should be positioned no higher than 1000mm above the finished floor level to enable enjoyment of the outlook.</li> <li>2. Window controls should be easy to operate with one hand and located within easy reach from</li> </ol>



			either a seated or standing position.
<i>Flooring</i>	No requirements.	No requirements.	<ol style="list-style-type: none"><li>1. All floor coverings should:<ol style="list-style-type: none"><li>a. Be firm, even and slip resistant;</li><li>b. Feature a level transition between abutting surfaces.</li></ol></li></ol>