



CHIEF FINANCIAL OFFICER
JEFF ATWATER
STATE OF FLORIDA

September 30, 2011

Michael Milnes, Deputy Director
Property & Casualty Product Review
Office of Insurance Regulation
200 East Gaines Street
Tallahassee, Florida 32399

RE: Proposed revisions to Form OIR-B1-1802, Uniform Mitigation Verification Inspection Form

Dear Mr. Milnes,

Thank you for the opportunity to provide written comments to proposed revisions of Form OIR-B1-1802, Uniform Mitigation Verification Inspection Form in response to the Public Hearing held on September 20, 2011. I submit the following comments for the record on behalf of the Department of Financial Services, Division of Consumer Services.

1. The Division agrees with the revised language that states the verification form is valid for five years provided no material changes have been made to the structure. This revision will allow homeowners to continue to receive wind mitigation credits upon policy renewal without the need for a re-inspection. The Division does not feel the revised language limits the insured from making upgrades to the structure and having a new inspection to verify the new features. Likewise, the Division does not feel the revised language limits the insurer from re-inspecting the structure to determine if material changes have been made.
2. The Division supports the requirement of photographs to validate structural features identified in questions three through seven. The requirement of photographs lends credibility to the information documented on the Uniform Mitigation Verification Inspection Form and certifies the features on the structure and the inspection. The Division recommends requiring photographs for question two as well.
3. The Division supports the Office of Insurance Regulation's initiative of collecting information for the development of a standardized inspection manual. Consistent interpretation and application of the Uniform Mitigation Verification Inspection Form is critical to the wind mitigation inspection process.

FLORIDA DEPARTMENT OF FINANCIAL SERVICES
Tasha Carter • Director
Division of Consumer Services
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Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Tasha Carter". The signature is written in black ink and is positioned above the typed name and title.

Tasha Carter, Director
Division of Consumer Services
Department of Financial Services

cc: Robin Westcott, Esq.
Insurance Consumer Advocate