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**To:** Cindy Walden  
**Subject:** RE: 1802 comments

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**From:** Bob Farr [<mailto:candoinsp@earthlink.net>]  
**Sent:** Friday, September 30, 2011 1:14 PM  
**To:** [mike.milnes@floir.com](mailto:mike.milnes@floir.com)  
**Cc:** Steve Fredrickson; Cindy Walden  
**Subject:** Rules & Rates Hearing

Deputy Director Milnes;

Again, thank you and OIR for having us at the hearing on September 10th.

I have a follow up comment on Scott Koedel's remark about having been involved in over 100,000 inspections and no accidents. As I mentioned, I was representing the Florida Association of Building Inspectors (FABI) with over 660 members not including affiliates. Almost half of them have performed over 10,000 inspections, each. This means over 3,000,000 inspections and yes we have had inspectors, hydrated or not, fall through ceilings or off a roof. Why? Because of conditions and/or trying to get to a spot that ...just may be one step or reach to far. For the inspector to know where an edge is rather than the field for the nailing pattern, he would have to at least have 10 to 12 ft of movement and sometimes more (especially if you need to take pictures) in all directions from the point of access. If this is restricted, for whatever reason, then how can that be fair to the homeowner.

This brings up my main issue with the 1802 form. Using the words weakest in the form causes it to be useless in most homes as the inspection criterion is unachievable. I'd be glad to debate anybody that an inspector just can't honestly know the weakest point unless they are able to navigate and span the whole structure, including every nook and cranny. In older construction this is complicated with height and "clutter" restrictions. In newer construction it is complicated by inaccessible angles or nooks due to more modern elevations, insulation and/or insulation buffers and yes, maybe even "clutter", stored materials and personal belongings. This may not be fair to the homeowner or the insurance company.

The key words of weakest a fair are highlighted above because they appear in the statute and the February 1, 2010 Windstorm Mitigation Discounts Report. I emphasized honesty because of the added attention to the fraud statement on the signature page.

The point is, that with the type of real world constraints that do exist, the form, in its present and proposed state, is flawed and not practical to give the kind of true data to access the actual attributes of an individual home. That is if it is supposed to be fair, honest and truly able to identify the weakest part of any particular attribute.

Another unintended or unanticipated consequence is that of the form becoming a necessity in real estate transaction. For the fair estate to be made for the closing statement, the request for insurance quotes to include wind mitigation assumptions is making it necessary to have the buyer obtain an 1802 form to supply the information. Not only don't they own it but the inspector signs the form showing them as the owner. Perhaps, the current owner could supply their wind mitigation form for the use in the transaction.

There has to be a better way and, instead of the insurance companies causing the state to use its resources, they should come up with a way to be fair in assigning risk to establish fair rates. The base has to be expanded and take into account the fact some older homes could be built just as strong if not stronger than some of the new ones. There surely has to be a way to collect data on the damages by the age of the home as well as the age of the homes in the area hit by a storm that didn't have damages.