

Janice Flournory

To: Cindy Walden
Subject: RE: OIR-B1-1802 Comment

From: AFentriss@aol.com [<mailto:AFentriss@aol.com>]

Sent: Friday, July 08, 2011 1:50 PM

To: Cindy Walden; Michael Milnes; lisapate@floridarroof.com; reed@floridarroof.com; byrnerroof@aol.com; mjsssi@msn.com; manuelo@eagleroofing.com; tim@graboskiroofing.com; billy@rooftechfl.com

Subject: Re: OIR-B1-1802 Uniform Mitigation Verification Inspection Form Comment Due D...

On behalf for Florida Roofing, Sheet Metal and Air Conditioning Contractors Association, please accept these additional comments relating to OIR-B1-1802 UNIFORM MITIGATION VERIFICATION INSPECTION FORM and rule 690-170.0155, Florida Administrative Code:

1. We do not support splitting the process to adopt 2010 and 2011 legislative changes now and proposed ARA technical changes later. This is already confusing and complex for consumers and others, and making more than one set of changes will just make matters worse. In addition, changes take time to trickle down to all involved, and doing this twice will only confuse everyone (including insurer personnel) even more. In addition, it is our understanding that the Florida Building Commission has just appointed a workgroup to develop "enhancements" to this form and process. We support one set of changes all adopted at the same time.
2. We support proposed changes to add more information and detail relating to roofing. The lack of information in the current form has excluded participation for many types of roofing that are not excluded, simply not stated on the form. This has been unfair to affected consumers and needs to be corrected, and some of the proposed changes do take steps in that direction.
3. We support changes proposed by ARA and find that many of these proposed changes are corrections, rather than new material. We do think, however, that more work may be needed on some of the proposed alternate language provisions as some portions are incomplete (as to roof types and more). For example, it is our position that the proposed language "no roof covering meets the above minimum requirements" cannot be correct.
4. We remain concerned about the confusing differences (or not) with respect to this form and the effect of it between secondary water barrier, secondary water resistance, any other new term, minimum code requirements, and the balance between this and sound roofing practice. We understand that the insurance industry has one concern, but no one (even the insurance industry) is served if this form and process only addresses one thing to the detriment of others that will affect the durability and integrity of the roof system. Some of the concerns raised by our members include these:
 - a. There is a lot of confusion and misinformation floating around as to identifying just what is and is not considered secondary water resistance and a secondary water barrier. Peel and stick strips for insurance companies are 6 inches at the joints, the Florida Building Code states 4 inches, and in Miami-Dade/Broward, direct deck means over an anchor sheet (30#). All parties need to agree on direct deck as a secondary water barrier because if the roof (primary) gets blown off then the true secondary water barrier (direct deck peel and seal) will minimize interior damages.
 - b. Concerning secondary water barriers, I agree with the HVHZ's approach of using a "dry in" or "anchor sheet." I have had two different people tell me horror stories concerning shingles and underlayment becoming fused together making sheathing removal mandatory. These are the type of things I have been concerned about when taking what I feel is a more conservative approach concerning secondary water barriers.
 - c. We need to make sure sealed attics are not included and clarify that sealed attics need to be vented according to the Florida Building Code and most manufacturers.
5. We believe that roofing should be a separate component of this form and include wind uplift requirements for height and exposure.
6. If there is not a need to strengthen gable ends, then it should be removed from the work required. This is all very

expensive and requires multiple categories of licensees, so it is not harmless to leave unnecessary requirements in the law.

We thank you for the opportunity to provide these comments. If you have any questions or would like additional information, please do not hesitate to contact me at 850-222-2772 or by reply to this e-mail message.

Sincerely,

Anna Cam Fentriss
Legislative Counsel
Florida Roofing, Sheet Metal and Air Conditioning Contractors Association