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**To:** Cindy Walden  
**Subject:** RE: OIR-B1-1802 Uniform Mitigation Verification Inspection Form Comment Due Date

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**From:** [nh10@comcast.net](mailto:nh10@comcast.net) [mailto:nh10@comcast.net]  
**Sent:** Friday, July 08, 2011 4:34 PM  
**To:** Cindy Walden  
**Subject:** Re: OIR-B1-1802 Uniform Mitigation Verification Inspection Form Comment Due Date

Final comments regarding the OIR-B1-1802 form.

As an inspector performing wind mitigation inspections since 2006 and using various forms I would like express my opinion addressing several concerns. The original purpose for the mitigation inspection was to be a motivational vehicle so homeowners would strengthen/harden their homes, by offering discounts on their premiums for certain features. Is this form still doing this or has it become a tool to reward some and penalize others?

The OIR-B1-1802 form should address issues which a homeowner **can afford** to make changes in order to strengthen their homes. The changing of the amount of nails in connector is not feasibly possibly for the average homeowner. Many homes in Miami Dade and Broward Counties were built from the 1920's through the 1960's with materials (Dade County Pine), 1/4" straps with only 2 -16d nails which have held perfectly. Yet this type of construction has not been tested, so why should a homeowner be penalized for a home that may be stronger than those getting the discounts. Coral rock homes have not been tested and other types of construction. This is why I suggest using, "approved metal connectors" for question #4 and do away with the arguments of what type of connector, how many nails, etc... Providing pictures for Question #3 is wrong. The metal detectors cannot delineate from metals, i.e 6d or 8d nails, staples, roof tin tab nails, etc... The new thing is when a concrete roof has been identified, underwriters want pictures of the concrete and the structural attachment. This is impossible as these items are covered by the roof covering. Pictures cannot be taken of the SWR as it is covered also. Rust on a strap is a subjective call based on an inspector's opinion. Some red rust on a 1/4" strap is common, but it would take much work to accurately determine the integral strength remaining; Unless a visual inspection can determine that the connector has deteriorate extensively.

Again I ask, why are we not involving the state universities engineering departments for data/statistics which would not be subject to the dynamics of special interest. Has there been involvement by the State Building Commission, Building Officials, and those with nothing to gain from the revision of this form?

The revision should make common sense, address issues that a homeowner can afford to change, be fair to all the citizens of the State and be continuously reviewed for improvement.

Thank you for the opportunity to participate in this process.

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**From:** "Cindy Walden" <[cindy.walden@flor.com](mailto:cindy.walden@flor.com)>  
**Sent:** Friday, July 1, 2011 1:32:42 PM  
**Subject:** OIR-B1-1802 Uniform Mitigation Verification Inspection Form Comment Due Date

Good afternoon,

In order to allow Interested Parties sufficient time to respond following the June 20, 2011 rule hearing , we have extended the deadline to submit comments and recommendations to the Office. They must be received by **Friday, July 8, 2011, 5 p.m.**

If there are any questions, please let me know.

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