
To: Cindy Walden
Subject: RE: 1802 Comments

From: Mitch Martin [mailto:mitchmmmm@hotmail.com]
Sent: Thursday, July 07, 2011 12:49 PM
To: Michael Milnes; Cindy Walden
Cc: Kevin McCarty; Jeff Atwater
Subject: FW: New/Revised OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)
Importance: High

Mike and Cindy,

I've reviewed most of the 1802 related documents you forwarded to me, including the comments and recommendations you have received and posted on your site concerning the proposed update/revisions to the 1802 Inspection & Insurance Discount Qualification Form! I changed the Title to reflect its true purpose or show the value it has to Insurance purchasers! I have noticed that you have received what I consider few comments and recommendations for this important update, which I believe is due to poor public notice or the lack of an early listing or posting of the actual 1802 Form being revised along with the public notice of a Rule change. This may be outside the scope of your Office, but I believe such notice is essential for any document, Rule, or Form being changed so it will be easily available to the Public and concerned parties to review! In my review of the posted comments and recommendations, I did note that a few submissions are missing their attachments, which had all their recommendations? This should be an easy to fix clerical error! The submissions with missing attachments and data are from: David Dipuglia, Nick Hernandez, Richard Haynes, and Sunshine State Insurance Co?

The primary reason for this message is to request additional info, background data, and your rationale for changing or proposing a change back to the previous definition for a HIP Roof, which is one of the largest discount items (if not the largest) allowed by Insurance Companies? The previous definition used does not seem to be supported by anyone submitting comments, even though it may appear that way as the previous definition is now listed on the proposed new Forms! I don't understand the reason for proposing a change to the old definition without any revisions, as it is completely vague and hard to use as a concise definition for a HIP Roof, with a portion Gable? It uses terms that are not precisely defined or undefined and it uses a 50% threshold for defining any portion of the Roof that may be a Gable or Other type Roof? How was the 50% value selected and why can it not be some other value such as 75% or even 90%? Basically, the old definition being resurrected does not precisely define or help determine what portion of a HIP Roof can be Gable or Other style Roof, without it being more precisely written to define its terms and the reason for using 50%! The current definition can easily be precisely defined and interpreted, with a few additions and clarifications, so it should be retained and rewritten! An abrupt change back to the old definition would be too disruptive to Insured and the Insurers and would create many problems with Insurance policies!

Request you provide the information needed and requested above, so that I can submit a more detailed list of proposed suggested changes for the new 1802 Form to be issued, especially the HIP Roof definition!

I understand the 8th is the final day for such comment input, so your response is very much needed before the deadline! I realize and sympathize that you have a tough job with the needed update for this Form, as regular updates will probably be the norm for this one! However, I also know and must make clear that any definitions used on the 1802 Form for defining when such valuable discounts must be given by Insurers is very important to anyone buying Insurance or already having such discounts! The definitions must not be left vague and subject to many different interpretations by Insurers, Inspectors and Insurance Companies! The definitions must be very clear, all vague terms defined, and measurement instructions clearly defined. The use of certain percentages for allowing other Roof types such as Gable must be explained and justified! In order words, the definitions used on this Form are critical in justifying discounts and preventing many disputes that will occur, if they are left vague and subject to guess work, between Insurers, Inspectors, and Insurance Company Underwriters!

Thanks for your help! Please let me know if any additional extensions are issued for comment submissions!

Mitchell

From: mitchmmmm@hotmail.com
To: michael.milnes@floir.com
Subject: New/Revised OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)
Date: Thu, 23 Jun 2011 01:59:52 -0400

Michael Milnes
OIR

Michael,

Request a copy of the proposed/revised [69O-170.0155](#): Forms or final rule, and the proposed or final OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)

I understand the revised Rule and OIR Form may not yet be final or approved. However, I'd like to see a copy of the proposed rule and revised Form, if not yet final or in effect! If the new/revised rule and Form are not yet approved or in effect, please send a copy of the current Rule and OIR-B1-1802 that is effective! Also, when do you expect the new OIR-B1-1802 Form to be effective or approved, if not already?

Thank you for your assistance with this request!

Mitchell Martin