

## Janice Flournory

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**To:** Cindy Walden  
**Subject:** RE: FIC, PCI, NAMIC Comments on OIR-B1-1802

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**From:** Sam Miller [<mailto:smiller@flains.org>]  
**Sent:** Friday, July 08, 2011 10:15 AM  
**To:** Cindy Walden; Michael Milnes  
**Subject:** Re: FIC, PCI, NAMIC Comments on OIR-B1-1802

Cindy,

Our comments are pasted below and also attached.

Thank you for keeping the record open for such an extended period of time.

July 8, 2011

Mr. Michael C. Milnes, CPM  
Deputy Director  
Property & Casualty Product Review  
Florida Office of Insurance Regulation  
Tallahassee, FL

Dear Mr. Milnes:

These comments are submitted on behalf of the Florida Insurance Council, Property Casualty Insurers Association of American, and the National Association of Mutual Insurance Companies.

Thank you for OIR's extensive and productive leadership on development of OIR-B1-1802, the uniform Mitigation Verification Inspection Form, over the last several years. While we do express below some concerns with the proposed draft which was reviewed during the recent hearing, we applaud you for the dramatic improvements and enhancements in the form during recent rule-making.

Here are specific comments on the current proposed rule, including revisions proposed by Applied Insurance Research:

**Building Features Inconsistent with Premium Credits.** The building features identified on the form already do not match up with the wind mitigation credits OIR has approved for carriers. Revisions that require more detail will only further cloud and dilute the accuracy of the existing credits. Continually revising the form at this point is not helpful.

**Roof Geometry.** The previous definition of hip roof as "with no other roof shapes greater than 10% of the total building perimeter" -- adopted only seven months ago -- is preferable than reverting to "no gable end that exceeds 50% of a major wall length." Specifically, there appears to be no particular reason or cited source for this change, but changing the definition again will certainly result in unnecessary confusion for agents and consumers. For instance, what is a "major wall"? Such a change could also result in

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improperly allowing more roofs to be defined as hip roof versus non-hip roof. This would increase the credits given without any associated reduction in risk for windstorm damage. We recommend retaining the current definition.

**Predominant Roof Covering.** By a strict reading of the current language, tile roofs would never qualify for option A, which only applies to shingle and metal roofs. Is it OIR's intent that tile roofs do not qualify? In addition, under the current proposal, option B does not seem complete or is missing a requirement, and options D and E seem redundant to options F and G..

**Garage Door/Opening Protections.** Removing the garage door from the opening protection will require an adjustment to the credits given. There does not seem to be any support or evidence for doing this.

Thank you for your consideration of these comments. We look forward to continuing working with OIR on this important issue.

Sincerely,

Sam Miller  
Florida Insurance Council

William Stander  
Property Casualty Insurers

Liz Reynolds  
National Association of Mutual Insurance Companies

>>> "Cindy Walden" <[cindy.walden@floir.com](mailto:cindy.walden@floir.com)> 7/1/2011 1:44:47 PM >>>

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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