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September 30, 2011

Mr. Mike Milnes
Deputy Director
Bureau of Product Review
Office of Insurance Regulation
300 East Gaines Street
Tallahassee, FL 32399-0350

RE: September 20, 2011 Hearing on Mitigation Verification Inspection Form

Dear Mike:

During the September 20 hearing, you raised specifically the issue of whether the safety of building inspectors might be jeopardized through the photo requirements which have been in OIR Form B1-1802 for some time. An association representing inspectors stated that it is common for inspectors to injure themselves climbing into an attic or suffer from the extreme heat they will encounter up there. You heard from several building inspectors that safety is not really an issue; photos in attic spaces can be safely taken in the overwhelmingly majority of cases and when there is a problem, entry can be made through the roof.

We also believe inspectors can safely secure photos. It is the Florida Insurance Council's firm belief that the requirement of photographs of mitigation features and other documentation supporting findings in the mitigation verification form is possibly the single most important step to strengthen OIR-B1-1802 implemented during the last two or three years of rule-making on the form. An inspector cannot certify that mitigation features are in place in an attic without going into the area and providing the photo documentation.

FIC continues to support photo requirements and other documentation requirements in the form.

We appreciate the Office's hard work to develop a complete, accurate and effective mitigation verification inspection form.

Sam Miller

Executive Vice President
Florida Insurance Council