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**To:** Cindy Walden  
**Subject:** RE: OIR-B1-1802 Comments

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**From:** Brad Burton [<mailto:bburton@oigfl.com>]  
**Sent:** Wednesday, July 06, 2011 3:02 PM  
**To:** Cindy Walden  
**Cc:** Steve Fredrickson  
**Subject:** OIR-B1-1802 Modifications

Cindy,

I am writing to you to express my views on proposed modifications to the 1802. I have read with interest the comments from various attorneys, engineers as well as representatives from the disaster recovery industry. In my opinion, all are neglecting to consider the fact that the entire program is founded on suspect theory. Specifically, that the foundation of the structure and value of premium credits were based on a poorly mitigated dwelling rather than building codes in force at the time of construction. Logically there should be no credits for simply adhering to building codes. Credit should only be given for measures that extend above and beyond, such as impact windows and shutters, secondary water resistance, etc., though in some cases even these are required by code. However, I would agree that a distinction between various forms of roof cover would be beneficial.

In addition, the building features identified on the form already do not match up with the wind mit premium 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. I would suggest the form be left as is, aside from the changes the roof cover classifications, and focus be concentrated on development of a program that promotes additional hardening of structures as opposed to reducing premiums for existing construction.

Regards,

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