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July 8, 2011

Delivered via Electronic Mail

Mike Milnes
Deputy Director
Property and Casualty Product Review
Office of Insurance Regulation
200 E. Gaines Street
Tallahassee, FL 32399-0350

Re: Proposed Revisions to Form OIR-B1-1802

Dear Mr. Milnes:

Please allow this letter to serve as a follow up to the one submitted earlier this week. Let me restate my sincere gratitude for your leadership role in this matter. Perhaps nothing has affected the insurance industry's profitability as much as wind mitigation credits, most of which are generated from the Form OIR-B1-1802 ("Form 1802").

Item 1. Original Building Permit Application Date or Year of Construction

- The option, "Insurer" in category B.2., should be eliminated. We have found that some inspectors misinterpret "Insurer" to mean "Insured". More importantly, it may be imprudent for an insurer to rely on the records of another, unaffiliated insurer. The accuracy of insurer records is not consistent throughout the industry.

Item 2. Predominant Roof Covering

- This section does not clearly establish a category where compliance with the building code in effect at the time of installation can be affirmed. Please consider adding, "D. Above Roof cover type is compliant with the building code in effect at the time and location of installation. Yes No".

Item 4. Roof to Wall Attachment

- The nail configuration should be at a 3:1 ratio, the testing by Simpson notwithstanding. This recommendation is based on the practical experience of those that have been in the construction and home inspection business for many, many years.

Item 6. Secondary Water Resistance

- A note at the bottom of this Item should state, "If the SWR cannot be verified with a photo thereof, provide a copy of documentation that demonstrates presence and type of SWR."

Mr. Milnes
July 8, 2011

Item 7. Opening Protections

- Generally speaking, the table is an improvement on prior attempts to reflect the type and quality of opening protections. There are two observations, however.
 - o Row C would appear to be unnecessary in that there is no associated credit for this opening protection. The presence of this selection may result in confusion.
 - o Row F is simply too much of a wild card and may be subject to over-selection due to the absence of any need for documentation. This selection should be removed.

Bottom of each Page

- The duration of a Form 1802's validity remains subject to several interpretations. Changing the "up to" language to "for" will only exacerbate the situation. Absent clear and universal instructions from the Office relative how long a Form 1802 should be acceptable, the existing language should be retained.

Bottom of last Page

- The statement regarding the potential for additional questions regarding mitigation features is very good. Its important warrants moving this statement to immediately below the **Owner Information** box on the first page.

I hope that the preceding is helpful and would invite your call should you have any additional questions or if I might clarify anything herein.

Sincerely,



J. Steve Roddenberry

JSR:rsr