
To: Cindy Walden
Subject: Wind Loss Mitigation Proposed Form Changes

From: Amy Brown [<mailto:ABrown@aiicfl.com>]
Sent: Wednesday, July 06, 2011 1:10 PM
To: Cindy Walden
Cc: Lisa Miller; Jenny Hodge
Subject: Wind Loss Mitigation Proposed Form Changes

Dear Ms. Walden,

Thank you for the opportunity to comment on the OIR's proposed changes to the Wind Loss Mitigation form.

We do not believe it is necessary to include the ARA detail into the form itself. This information is already required by carriers in the documentation report (e.g., photos of the nail type and length, spacing, deck thickness) which is how carriers quantify the answers selected on the current form. The ARA form attempts to measure these data points at a form level but fails to offer guidance on using the information to derive whether it is a deck A, B or C. Such a determination requires sophisticated mapping technology or the expertise of an engineer.

The goal of the form should be to provide specific answers in a clear fashion such that inspectors can select the answer in a way that is easily understood by both underwriters and consumers. While the current form is greatly improved, we recommend adopting the following changes:

1. Display the documentation requirements at the top of the form and have one clear section of necessary documentation. Carriers already require documentation on Section 2. Thus, there is no need to refer to an additional section and there is only one clear statement of documentation.
2. Roof Covering - should include separate checkboxes for tile, metal or all other roof types.
3. Roof to Wall – add a requirement for a minimum of 3 nails in a clip. Modify the current three and one nailing for wraps to define it as two on one side and one on the other side. This change is supported by recent testing done by Simpson Strong-Tie, who is the leading roof tie manufacturer.
4. Roof to Wall – create and include additional language to identify severe corrosion and proper alignment of the connector as well as to direct the inspector back to Answer A when the definitions of the connectors are not met.
5. Roof Geometry – correct the definition of “flat” to be when 90% of the roof is less than 2/12 for multi-family. For residential, the correct answers are either Hip or Non-Hip.
6. Secondary Water Resistance (SWR) – Although the roofing and sheet metal associations testified that SWR should be changed for consistency with the building code language for Secondary Water Barrier (which is only felt paper), it creates confusion for the roofing industry. Instead, to create specific distinction and clarity, we support changing this section to “Sealed Roof Decking (SRD)” as created by the Institute for Building & Home Safety to specifically address SWR.
7. The signature block change is mandated.

If you need anything additional from us, please let me know.

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