

From: [Mitch Martin](#)
To: [Cindy Walden](#)
Subject: RE: New/Revised OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)
Date: Monday, June 27, 2011 11:40:41 AM
Importance: High

Cindy,

The below additional comments about the HIP Roof definition apply to your proposed revised 1802 Form and the proposed completely new definition for a HIP Roof, that may have some percentage of a Non-HIP Roof but still be considered a HIP Roof for an Insurance discount! This suggestion would only apply if you or the OIR insists on returning to the previous obsolete (and completely different) definition that was used prior to the current definition, which I consider a bad idea as it will only create much more confusion for Florida Home Owners who are trying to qualify for available discounts! The State and your Office must consider the impact, costs, and confusion that such a drastic and completely different HIP Roof definition will create both with Home Owners and Insurance Companies, who have spent much time and money having Professional Inspectors qualify their Home for the discount or Insurers having Insured Homes re-inspected to see if they can dis-qualify the Homes for the discount! The impact of completely changing the definition is huge, especially when the change is now back to a previous definition that was dropped supposedly for good reasons! The State and OIR need to stick with one definition, and if the definition is having problems being interpreted or enforced or applied fairly or equitably or definitively, the definition should be clarified and not completely changed! This is the case with the current HIP Roof definition, which should remain the same but with added clarifications to prevent misinterpretations or unintended wrong measurements!

My additional suggestion, if the new HIP Roof definition (copied below) is somehow adopted follows:

A. Hip Roof Hip roof and has no gable end that exceeds 50% of a major wall length.

The above definition is too vague and open to too many different interpretations! The definition should state in some form to include: A major wall length includes any small or necessary offset (such as in a straight running side for a normal Wall) as may be necessary for an Entranceway or Garage openings. How is the Gable end measured? I propose that it be measured as the linear measurement of only the portion of the Gable Roof section that is level with or at the same height as the HIP Roof where it meets the Wall. This is because a portion of such a small Gable Roof section can and does overlap a HIP Roof section of a Roof in most cases, as when the Gable section is offset from the main or mostly HIP Roof! The overlapping Gable Roof portion or section should not be measured as part of or being part of a Gable or Gable Roof because the HIP Roof portion is the dominant Roof Shape where they overlap! The 50% was used based on what? Why not 75% or 90%?

The above would go a long way in clarifying the new definition, if somehow it is adopted and allowed to be used! The main point is that the definition should not be completely changed for an item that has so much monetary impact, and that has the potential to affect everyone that has such a discount already approved! Stability is good in this case!

Thank you again for your consideration of my comments and recommendations for the HIP Roof definition!

Mitchell

From: mitchmmmm@hotmail.com
To: cindy.walden@flore.com
Subject: Fw: New/Revised OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)
Date: Fri, 24 Jun 2011 01:16:42 -0400

Cindy,

I have had the opportunity to review the new proposed (possibly final if allowed to go into effect)?

) definition change to the HIP Roof Geometry, as a result of your 20 Jun 11 meeting, and I am very disappointed and shocked to see the change made! This is a return to (or cave-in to Insurance Companies) the past definition which was highly unreliable and unusable and uncorrelatable (which was why it was changed)! This old definition was and is unclear and offers no or no clear instruction on how to measure or determine if it applies to any Home or situation in a fair way! It is probably being resurrected due to Insurance Company lobbying, as that definition did not allow or allowed much fewer discounts for HIP Roofs using the old vague and unreliable definition! The old definition is simply unacceptable, as it excludes many Homes that have an almost pure HIP Roof (95% or more) that should be allowed the discount, due to studies that prove Homes with mostly HIP Roofs suffer less wind damage in Hurricanes or other high Wind conditions! This new or changed definition needs to be suspended, delayed for more study, changed, or returned to the current one, with possibly more clarifying language added so there are no misunderstandings (by the Inspector or Insurance Underwriters) when an Inspector determines or measures the non-HIP portion of a HIP Roof!

Your Proposed HIP Roof definition changes are copied below:

Roof Geometry: What is the roof shape(s)? (Porches or carports that are attached only to the fascia or wall of the host structure and not structurally connected to the main roof system are not considered in the roof geometry determination.)

- A. Hip Roof Hip roof and has no gable end that exceeds 50% of a major wall length. Hip roof with no other roof shapes greater than 10% of the total building perimeter.
- B. Non-Hip Roof Any other roof shape or combination of roof shapes including hip, gable, gambrel, mansard and other roof shapes not including flat roofs.
- C. Flat Roof Flat roof shape in which 90% of the total roof area has a slope of less than 2:12. Flat roof shape greater than 100 square feet or 10% of the entire roof, whichever is greater.

My recommendation, based on a real life situation or my real life situation and the way Insurance Companies are acting and treating the results of such Inspections are:

The current HIP Roof definition is copied below:

Roof Geometry: What is the roof shape(s)? (Porches or carports that are attached only to the fascia or wall of the host structure and not structurally connected to the main roof system are not considered in the roof geometry determination.)

- A. Hip Roof Hip roof with no other roof shapes greater than 10% of the total building perimeter.
- B. Non-Hip Roof Any other roof shape or combination of roof shapes including hip, gable, gambrel, mansard and other roof shapes not including flat roofs.
- C. Flat Roof Flat roof shape greater than 100 square feet or 10% of the entire roof, whichever is greater

The only changes needed are to more clearly explain and define the definition of a HIP Roof using this old definition! My suggestions are listed below for how the definition should be interrupted (and they should be added to the definition!) for all measurements made:

The above HIP Roof definition (the current one) has been interpreted literally and logically to mean: The total linear perimeter measurement of the HIP Roof, and not just the Building Wall measurements as listed on Plats or Surveys. Any other Roof shape linear measurement will be measured at the same level or height as the HIP Roof perimeter measurement or where the Roof meets the Wall. The other (below 10%) Roof shape for a HIP Roof can be Gable or any other type roof shape. Any part of the Roof is included in a HIP Roof perimeter linear measurement, if it is structurally a part of the Roof and not a Porch or Carport that is structurally separate from the main Roof.

If the definition for a HIP Roof insurance discount is (for some reason) changed back to the old or previous unworkable definition as proposed, it should be made clear on the OIR Inspection Form that the old definition still applies if the Wind Inspection was performed prior to any approved new definition, and that the old definition and Inspection will apply for the full 5 years as promised on the

Form (as the Homeowner has invested in the expense and time required to have a Home Inspection performed by a Professional Independent Inspector!)

Request all of the above be taken into consideration for the revised OIR Form before any new Form is issued, and preferably the current definition should be retained but with more clarifications as suggested above!

Thank you for the opportunity to comment on the Proposed new HIP Roof Definition, which I believe is totally unworkable and invalid! Please forward them to those concerned or involved in revising the OIR Form!

Mitchell Martin
Home Owner, with a real life situation!

From: [Mitch](#)
Sent: Thursday, June 23, 2011 10:57 PM
To: [Cindy Walden](#)
Subject: Re: New/Revised OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)

Cindy,

Absolutely, although it probably will not help me in my current real life real time dispute with People's Trust Insurance Co! I am currently in a dispute with the Company and its Underwriters on one of the major Discounts they are supposed to offer and give its qualifying Customers! Long story short, I had a HIP Roof discount approved the 1st year, then disapproved the next year, then reapproved after paying \$100 for a professional Wind Inspection, then again disapproved after the Company's Underwriters directly coerced the Inspector into changing his Inspection Report without the Inspector performing a new Inspection or onsite visit and re-measurement, and the dispute is now under review by:

Ray Balcom
Insurance Specialist III
FLORIDA DEPARTMENT OF FINANCIAL SERVICES
DIVISION OF CONSUMER SERVICES

I'm not sure how effective this Office is at enforcing the Discounts and the published rules for qualifying for such discounts, such as the definition included for a HIP Roof on the OIR Form that is a part of the Rule! It seems the Insurance Companies are being allowed to interpret the Rule or definition to their advantage, at least for the HIP Roof discount! Your Office or the FDFS should be allowed to enforce the Rules, if they are approved and published, and not let the Companies write or use their own definitions and rules simply to gouge their customers for more profit. If a Professional Paid Home Inspector has certified a HIP Roof for a Home, the Insurance Company should not be allowed to directly coerce the Inspector to change his Report without the involvement or knowledge of the Homeowner who paid for the Inspection and without providing the Homeowner any details on how or why the HIP Roof determination was changed! This is my situation and Case, which I am still contesting thru the FDFS!

I appreciate your offer to add me to the list for review of future changes to the 1802 Form! I haven't reviewed the new one yet you have attached, so I hope you haven't made any major changes to the HIP Roof definition, unless to more clearly define (or determine) a HIP Roof when it is not a 100% HIP Roof! You mentioned the new rule and Form will be open for review or comments for 10 days or until 30 Jun 11. How or where can I add comments, if I so choose, and will they be considered for the new Rule and Form?

Thanks

Mitchell

From: [Cindy Walden](#)
Sent: Thursday, June 23, 2011 10:28 AM
To: mitchmmmm@hotmail.com
Subject: FW: New/Revised OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)

Mr. Martin,

Attached are the draft forms discussed in the 6.20.11 rule hearing as well as the current form. The record will be open for 10 days from the hearing date for comments, etc. Would you like to be added to our Interested Parties List for future updates regarding the 1802 form ?

Cindy Walden
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Property & Casualty Product Review
(850) 413-2616 (Phone)
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Cindy.Walden@flio.com

From: Michael Milnes
Sent: Thursday, June 23, 2011 7:19 AM
To: Cindy Walden
Subject: Fw: New/Revised OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)
Importance: High

Michael C. Milnes, CPM
Deputy Director
Property & Casualty Product Review
Phone: (850) 413-5306
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Sent from my BlackBerry Wireless Handheld

From: Mitch <mitchmmmm@hotmail.com>
To: Michael Milnes
Sent: Thu Jun 23 01:59:52 2011
Subject: New/Revised OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)

Michael Milnes
OIR

Michael,

Request a copy of the proposed/revised [69O-170.0155](#): Forms or final rule, and the proposed or final OIR-B1-1802, "Uniform Mitigation Verification Inspection Form,"(Rev. 05/11)

I understand the revised Rule and OIR Form may not yet be final or approved. However, I'd like to see a copy of the proposed rule and revised Form, if not yet final or in effect! If the new/revised rule and Form are not yet approved or in effect, please send a copy of the current Rule and OIR-B1-1802 that is effective! Also, when do you expect the new OIR-B1-1802 Form to be effective or approved, if not

already?

Thank you for your assistance with this request!

Mitchell Martin