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July 5, 2011

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~~: Mike

Thank you for your continued role in assisting all interested parties in the revisions to Form OIR-B1-1802 ("Form 1802"). The process is obviously arduous and the institutional knowledge that you bring to this endeavor has proven to be invaluable.

While there is a great temptation to take the currently approved Form 1802 and make recommendations that are parochial, I believe that the best use of our time would be to focus on the proposed changes offered by Applied Research Associates ("ARA"), and suggest modest changes to that document. Accordingly, the attached document reflects proposed changes to those offered by ARA and distributed by you in an e-mail dated June 3, 2011. The changes proposed in the attached are explained below:

- Move the "**NOTE: At least one photo . . .**" from below item 2 to above item 1. The intent here is to emphasize the importance of accompanying photos at the beginning of the sections reflecting mitigation features.
- Add "**Your insurer may ask for documentation regarding your mitigation feature(s)**" to the **NOTE** so that all parties will understand a follow-up inquiry from the insurer may occur.

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

- Add "(submit documentation)" after "Source of year built" to assure proper credit from an underwriting perspective.

Item 2. Predominant Roof Covering

- Add "Asphalt Composition" to the description of Shingles in C.2., to clarify the type of shingles contemplated in the credit.
- Add "Panels" to description of Metal roof in C.3., to distinguish this type of metal roof from one with metal shingles.
- Add "or roll roofing" to the description of Built-up in C.4., for clarification purposes.

- Add a seventh type of roof covering, "Metal Shingles" to distinguish this type of roof covering from "Metal Panels".

Item 3. Roof Deck Attachment

- Add "or dimensional boards" to description of Roof Deck Attachment. This clarification may have been inadvertently omitted.

Item 4. Roof to Wall Attachment

- Add "Red flaking rust is severe corroded rust" as guidance for inspectors and consistent with testimony at the most recent Hearing regarding this indicator of deteriorating wraps.
- Add "with a minimum of 3 nails" to the description of "B. Clips", for clarity.
- Add "Placement must be within ¼ inch of the structure or blocking (max 1.5" thick) with no red flaking rust (severe corrosion)" to the description of "C. Single Wraps" to provide guidance to inspectors when evaluating the functionality of single wraps. If they are not affixed properly, their effectiveness is at a minimum compromised and at worst rendered negligible.
- Add "Placement must be within ¼ inch of the structure or blocking (max 1.5" thick) with no red flaking rust (severe corrosion)" to the description of "D. Double Wraps" to provide guidance to inspectors when evaluating the functionality of double wraps. If they are not affixed properly, their effectiveness is at a minimum compromised and at worst rendered negligible.

Item 5. Roof Geometry

- Add "C. Flat Roof: At least 10% or more of the main roof area of the building has a slope of less than or equal to 2:12" as an additional option under Roof Geometry. Again, this additional description is designed to allow off-site underwriters to get a clearer understanding of the roof geometry, one of the more critical wind mitigating features of a structure.

Item 6. Secondary Water Resistance (SWR)

- In light of the comments at the most recent Hearing and given what may be a universally misunderstood description, we propose changing the name of this item to "Sealed Roof Deck (SRD): standard underlayments or hot mopped felts are not SRD)". This description is intended to reduce the confusion surrounding acceptable means of effecting secondary water resistance. References to "SWR" in the descriptions within item 6 should be changed to "SRD".

Item 7. Opening Protection

- Generally, the ARA proposal is acceptable, but we find that this new means of recording opening protections require some direction in how to complete the table. Also there is no description for E, F, N, or X.
- To be comprehensive, "Non-glazed door not meeting or unknown as meeting FBC wind pressure requirements" and "Windborne debris protection missing in some openings" should be added to the table with correlating descriptions. These additional table items are intended to address concerns with garage doors. Frankly, garage doors cover a home's largest opening. If they do not meet the FBC or are not otherwise protected against wind pressure and are not impact resistant (when and where required), a credit reflecting complete opening protection should be withheld.

Signature Page

- We believe the proposals made in the ARA version referenced acceptable.

Mr. Milnes
July 5, 2011

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.

Let me thank you again for your consideration of the above and attached. I appreciate that the attached is "busy", but trust your familiarity with the Form and its many iterations will permit your appreciation and understanding of the suggested changes. If that is not the case and additional clarity would assist in your deliberations, please do not hesitate to contact me.

Sincerely,

Steve

J. Steve Roddenberry

JSR:rsr

Attachment

~~Draft Proposed Near-Term Changes for OIR Review – Applied Research Associates, F. Lavelle, 5/27/11~~

Uniform Mitigation Verification Inspection Form

Maintain a copy of this form with the insurance policy

Inspection Date:		
Owner Information		
Owner Name:		Contact Person:
Address:		Home Phone:
City:	Zip:	Work Phone:
County:		Cell Phone:
Insurance Company:		Policy #:
Year of Home:	# of Stories:	Email:

Comment [f1]: High Velocity Hurricane Zone (HVHZ) = Miami-Dade or Broward County

Note: At least one photo documenting the existence of each visible and accessible construction or mitigation attribute must accompany this form. Your insurer may ask for documentation regarding your mitigation feature(s).

1. **Original Building Permit Application Date or Year of Construction:** Was the structure built to the Florida Building Code?

Comment [f2]: Purpose of this question is to determine whether to use the "Existing" or "New" credits table. Permit application date is required to qualify for "New" construction credits if year built is 2002 or 2003.

   A. Building permit application data (MM/DD/YYYY): _____/_____/_____ or ☐ Not available
   B. Year built (YYYY): _____ or ☐ Not available or ☐ Not required if permit application date is known
   Source of year built: (submit documentation)
      ☐ B.1. Tax records
      ☐ B.2. Insurer
      ☐ B.3. Other: _____

2. **Predominant Roof Covering:**

Comment [f3]: Part C has been added because the 2008 ARA study and at least some approved filings differentiate credits between tile and non-tile roofs. "FBC Equivalent" roof cover credit is allowed for SFBC permitted roofs (Permit Dates: 9/1/94 - 2/28/02) in Miami-Dade and Broward counties.

   A. Roof Cover Permit Application Date (MM/DD/YYYY): _____/_____/_____ or ☐ Not available
   B. Year of Installation (YYYY): _____ or ☐ Not available or ☐ Not required if permit application date is known
   C. Roof Cover Type:
      ☐ C.1. Tile (clay or concrete)
      ☐ C.2. Asphalt Composition Shingles
      ☐ C.3. Metal Panels
      ☐ C.4. Built-up or roll roofing
      ☐ C.5. Membrane
      ☐ C.6. Other: _____ C.7 Metal Shingles

~~**NOTE: At least one photo documenting the existence of each visible and accessible construction or mitigation attribute marked in Sections 3 through 9 must accompany this form.**~~

3. **Roof Deck Attachment:** What is the **weakest** form of roof deck attachment?
   ☐ A/B/C. Plywood/Oriented strand board (OSB) roof sheathing or dimensional boards attached to the roof trusses or rafters.
      3.1 Truss/rafter spacing: _____ inches on center
      3.2 Fastener type:
         ☐ 3.2.1. Smooth shank nails
         ☐ 3.2.2. Ring shank nails
         ☐ 3.2.3. Twist shank nails
         ☐ 3.2.4. Staples
         ☐ 3.2.5. Adhesive or closed cell foam
         ☐ 3.2.6. Screws
         ☐ 3.2.7. Other: _____
      3.3 Nominal roof sheathing thickness: _____ inches (nearest 1/8")
      3.4 Nail or screw length: _____ inches (nearest 1/8"; including deck thickness)
      3.5 Nail or screw field counts in 48" length – Field Location 1: _____ Field Location 2: _____
      3.6 Missed or side splitting nails or screws in 48" length – Field Location 1: _____ Field Location 2: _____

Comment [f4]: Use this information along with lookup tables to assign Deck A, B, or C

      Final classification:
         ☐ A (neither B nor C)
         ☐ B (8d @ 6/12" or better)
         ☐ C (8d @ 6/6" or better)
   ☐ D. Reinforced Concrete Roof Deck.
   ☐ E. Other: _____
   ☐ F. Unknown or unidentified.

Inspectors Initials _____ **Property Address**_____

***This verification form is valid ~~up to~~ for five (5) years provided no material changes have been made to the structure.**

☐ G. No attic access.

4. **Roof to Wall Attachment**: What is the **weakest** roof to wall connection? (Red flaking rust is severe corroded rust)

☐ A. Toe Nails Rafter/truss anchored to top plate of wall using nails driven at an angle through the rafter/truss and attached to the top plate of the wall.

☐ B. Clips of a diamond type clip) Metal attachments on every rafter/truss with a miniumum of 3 nails to one side (or both sides in the case of the rafter/truss and attached to the top plate of the wall frame or embedded in the bond beam.

☐ C. Single Wraps Metal Straps must be secured to every rafter/truss with a minimum of 2 nails on the front side, wrapping over and securing to the opposite side of the rafter/truss with a minimum of 1 nail. The Strap must be attached to the top plate of the wall frame or embedded in the bond beam in at least one place. Placement must be within ¼ inch of the structure or blocking (max 1.5" thick) with no red flaking rust (severe corrosion).

☐ D. Double Wraps Both Metal Straps must be secured to every rafter/truss with a minimum of 2 nails on the front side, wrapping over and securing to the opposite side of the rafter/truss with a minimum of 1 nail. Each Strap must be attached to the top plate of the wall frame or embedded in the bond beam in at least one place. Placement must be within ¼ inch of the structure or blocking (max 1.5" thick) with no red rust flaking (severe corrosion).

☐ E. Structural Anchor bolts structurally connected or reinforced concrete roof.

☐ F. Other: _____

☐ G. Unknown or Unidentified

☐ H. No attic access

5. **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 other roof shapes greater than 10% of the total roof perimeter. (submit diagram and measurements.)

☐ Hip roof with no other roof shapes greater than 10% of the total main roof system perimeter.

☐ Total length of non-hip features: _____ feet; Total main roof system perimeter: _____ feet

☐ B. Non-Hip Roof other roof shapes Any other roof shape or combination of roof shapes including gable, flat, gambrel, mansard, and

☐ C. Flat Roof: At least 10% or more of the main roof area of the building has a slope of less than or equal to 2:12.

~~6. **Gable End Bracing**: For roof structures that contain gables, please check the **weakest** that apply:~~

~~☐ A. Gable End(s) are braced at a minimum in accordance with the 2001 Florida Building Code.~~

~~☐ B. Does not meet the above minimum requirements.~~

~~☐ C. Not applicable, unknown or unidentified.~~

~~7. **Wall Construction Type**: Check all wall construction types for exterior walls of the structure and percentages for each:~~

~~☐ A. Wood Frame _____%~~

~~☐ B. Un-Reinforced Masonry _____%~~

~~☐ C. Reinforced Masonry _____%~~

~~☐ D. Poured Concrete _____%~~

~~☐ E. Other: _____ _____%~~

6. **Sealed Roof Deck (SRD)**: (standard underlayments or hot mopped felts are not SRD)

☐ A. SRD Self adhering polymer modified bitumen roofing underlayment applied directly to the sheathing or foam adhesive SRD barrier (not foamed on insulation) applied as a secondary means to protect the dwelling from water intrusion.

Comment [f5]: Testing conducted by Simpson showed that 2+1 configuration is sufficient to produce resistance levels assumed in 2002 study.

Comment [f6]: In wood frame construction, the more common configuration would be a single strap that attaches to the wall on either side of the rafter or truss and wraps over the top of the truss or rafter. In this configuration at least 3 fasteners loaded in shear are needed to transfer the loads at each end of the strap, but those fasteners are on the outside of the wall frame and will generally not be visible from inside the attic.

Comment [f7]: Removed "Flat Roof". Not used in OIR-B1-1699. Need to create a separate form for residential buildings with five or more units.

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Comment [f8]: Need to provide guidance on identification and measurement of "non-hip" features.

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Comment [f9]: Deleted. Not used in OIR-B1-1699.

Comment [f10]: Deleted. Not used in OIR-B1-1699.

Comment [f11]: No changes

Inspectors Initials _____ **Property Address**_____

***This verification form is valid for ~~up to~~ five (5) years provided no material changes have been made to the structure.**

☐ B. No SRD

☐ C. Unknown or undetermined.

Inspectors Initials _____ Property Address_____

***This verification form is valid for ~~up to~~ five (5) years provided no material changes have been made to the structure.**

7. **Opening Protection:** Report the **weakest** form of wind borne debris protection installed on the structure in each of the six opening categories identified by the column heading. There must be exactly one check mark or "X" in each column.

		Glazed Openings				Non-Glazed Openings	
Opening Protection Level		Windows or Entry Doors	Garage Doors	Skylights	Glass Block	Entry Doors	Garage Doors
N/A	Not applicable -- there are no openings of this type on the structure						
A	Verified cyclic pressure & large missile rated (9 lb for windows/doors; 4.5 lb for skylights)						
B	Verified cyclic pressure & large missile rated (2, 4, 4.5, or 8 lb)						
C	Verified cyclic pressure & large missile rated (2 gram)						
D	Verified wood structural panels meeting 2004 FBC with 2006 supplements						
E	Non-glazed door meeting FBC wind pressure requirements						
F	Unverified, but materials and fasteners are typical of large missile (9 lb) rated devices						
N	Any other opening protection device that cannot be identified as A, B, C, D, E, or F						
X	No windborne debris protection						

Add line for "Non-glazed door not meeting or unknown as meeting FBC wind pressure requirements."
Add line for "Windborne debris protection missing on some openings."

Group A includes any of the following:

- Miami-Dade County Notice of Acceptance (NOA) 201, 202 **and** 203. (Large Missile - 9 lb.)
- Florida Building Code Testing Application Standard (TAS) 201, 202 **and** 203. (Large Missile – 9 lb.)
- American Society for Testing and Materials (ASTM) E 1886 **and** ASTM E 1996. (Large Missile – 9 lb.)
- Southern Standards Technical Document (SSTD) 12. (Large Missile – 9 lb.)
- For Skylights Only: ASTM E 1886/E 1996. (Large Missile - 4.5 lb.)
- For Garage Doors Only: ANSI/DASMA 115. (Large Missile – 9 lb.)

Note: For the HVHZ, systems must have either a Miami-Dade NOA or FBC Approval marked *"For Use in the HVHZ"*.

Group B includes any of the following:

- ASTM E 1886 and ASTM E 1996. (Large Missile – 4.5 lb.)
- SSTD 12. (Large Missile – 4 lb. to 8 lb.)
- ASTM E 1886/E 1996. (Large Missile - 2 to 4.5 lb.)

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Group C includes any of the following:

- Miami-Dade County NOA 201, 202 **and** 203. (Small Missile – 2grams)
- Florida Building Code TAS 201, 202 **and** 203. (Small Missile – 2 grams)
- ASTM E 1886 **and** ASTM E 1996. (Small Missile – 2 grams)
- SSTD 12. (Small Missile – 2 grams)

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Group D includes openings covered with plywood/OSB meeting the requirements of Section 1609 and Table 1609.1.4 of the 2004 FBC (with 2006 supplements).

Inspectors Initials _____ **Property Address**_____

***This verification form is valid for ~~up to~~ five (5) years provided no material changes have been made to the structure.**

8. (Exterior openings include, but are not limited to: windows, doors, garage doors, skylights, etc. Product approval may be required for opening protection devices without proper rating identification.)

☐ A. **All Exterior Openings (Glazed and Unglazed)** All exterior openings are fully protected at a minimum with impact resistant coverings, impact resistant doors and/or impact resistant window units that are listed as wind borne debris protection devices in the product approval system of the State of Florida or Miami-Dade County and meet the requirements of one of the following for "Cyclic Pressure and Large Missile Impact". For the HVHZ, systems must have either a Miami-Dade NOA or FBC Approval marked *"For Use in the HVHZ"*.

- ☐ Miami-Dade County Notice of Acceptance (NOA) 201, 202 **and** 203. (Large Missile - 9 lb.)
- ☐ Florida Building Code Testing Application Standard (TAS) 201, 202 **and** 203. (Large Missile – 9 lb.)
- ☐ American Society for Testing and Materials (ASTM) E 1886 **and** ASTM E 1996. (Large Missile – 9 lb.)
- ☐ Southern Standards Technical Document (SSTD) 12. (Large Missile – 9 lb.)
- ☐ For Skylights Only: ASTM E 1886/E 1996. (Large Missile - 4.5 lb.)
- ☐ For Garage Doors Only: ANSI/DASMA 115. (Large Missile – 9 lb.)

☐ B. **All exterior openings** are fully protected at a minimum with impact resistant coverings, impact resistant doors and/or impact resistant window units that are listed as windborne debris protection devices in the product approval system of the State of Florida or Miami-Dade County and meet the requirements of one of the following for "Cyclic Pressure and Large Missile Impact":

- ☐ ASTM E 1886 and ASTM E 1996. (Large Missile – 4.5 lb.)
- ☐ SSTD 12. (Large Missile – 4 lb. to 8 lb.)
- ☐ For Skylights Only: ASTM E 1886/E 1996. (Large Missile – 2 to 4.5 lb.)

☐ C. **All exterior openings** are fully protected at a minimum with impact resistant coverings, impact resistant doors and/or impact resistant window units that are listed as windborne debris protection devices in the product approval system of the State of Florida or Miami-Dade County and meet the requirements of one of the following for "Cyclic Pressure and Small Missile Impact":

- ☐ Miami-Dade County NOA 201, 202 **and** 203. (Small Missile – 2grams)
- ☐ Florida Building Code TAS 201, 202 **and** 203. (Small Missile – 2 grams)
- ☐ ASTM E 1886 **and** ASTM E 1996. (Small Missile – 2 grams)
- ☐ SSTD 12. (Small Missile – 2 grams)

☐ D. **All exterior openings** are fully protected with windborne debris protection devices that cannot be identified as Miami-Dade or Florida Building Code (FBC) product approved. This does not include plywood/OSB or plywood alternatives (see Answer "H").

All Glazed Exterior Openings

☐ E. **All glazed exterior openings** are fully protected at a minimum with impact resistant coverings and/or impact resistant window units that meet the requirements of one of the standards listed in Answer "A" of this question. (Large Missile – 9 lb.)

☐ F. **All glazed exterior openings** are fully protected at a minimum with impact resistant coverings and/or impact resistant window units that meet the requirements of one of the standards listed in Answer "B" of this question. (Large Missile – 2 lb. – 8 lb.)

☐ G. **All glazed exterior openings** are fully protected at a minimum with impact resistant coverings and/or impact resistant window units that meet the requirements of one of the standards listed in Answer "C" of this question. (Small Missile – 2 grams)

☐ H. **All glazed exterior openings** are covered with plywood/OSB meeting the requirements of Section 1609 and Table 1609.1.4 of the 2004 FBC (with 2006 supplements).

☐ I. **All glazed exterior openings** are fully protected with wind-borne debris protection devices that cannot be identified as Miami-Dade or FBC product approved. This does not include plywood/OSB or other plywood alternatives that do not meet Answer H (see Answer "K").

None or Some Glazed Openings

☐ J. At least one glazed exterior opening does not have wind-borne debris protection.

☐ K. No glazed exterior openings have wind-borne debris protection. This includes plywood/OSB or plywood alternative systems that do not meet Answer "H".

☐ L. Unknown or undetermined.

Inspectors Initials _____ **Property Address**_____

***This verification form is valid for ~~up to~~ five (5) years provided no material changes have been made to the structure.**

MITIGATION INSPECTIONS MUST BE CERTIFIED BY A QUALIFIED INSPECTOR. **Section 627.711(2), Florida Statutes, provides a listing of individuals who may sign this form.**		
Qualified Inspector Name:	License Type:	License or Certificate #:
Inspection Company:	Phone:	

Qualified Inspector – I hold an active license as a: (check one)

- ☐ Home inspector licensed under Section 468.8314, Florida Statutes who has completed at least 3 hours of hurricane mitigation training approved by the Construction Industry Licensing Board and completion of a proficiency exam.
- ☐ Building code inspector certified under Section 468.607, Florida Statutes.
- ☐ General, building or residential contractor licensed under Section 489.111, Florida Statutes.
- ☐ Professional engineer licensed under Section 471.015, Florida Statutes.
- ☐ Professional architect licensed under Section 481.213, Florida Statutes.
- ☐ Any other individual or entity recognized by the insurer as possessing the necessary qualifications to properly complete a uniform mitigation verification form pursuant to Section 627.711(2), Florida Statutes.

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Individuals other than licensed contractors licensed under Section 489.111, Florida Statutes, or professional engineer licensed under Section 471.015, Florida Statues, must inspect the structures personally and not through employees or other persons. Licensees under Section s.471.015 or Section s.489.111, Florida Statutes may authorize a direct employee who possesses the requisite skill, knowledge, and experience to conduct a mitigation verification inspection.

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I, _____ am a qualified inspector and I personally performed the inspection or (*licensed contractors and professional engineers only*) I had my employee (_____) perform the inspection and I agree to be responsible for his/her work.
(print name) (print name of inspector)

Qualified Inspector Signature: _____ Date: _____

An individual or entity who knowingly or through gross negligence provides a false or fraudulent mitigation verification form is subject to investigation by the Florida Division of Insurance Fraud and may be subject to administrative action by the appropriate licensing agency or to criminal prosecution. (Section 627.711(4)-(7), Florida Statutes) The Qualified Inspector who certifies this form shall be directly liable for the misconduct acts of employees as if the authorized mitigation inspector personally performed the inspection.

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Homeowner to complete: I certify that the named Qualified Inspector or his or her employee did perform an inspection of the residence identified on this form and that proof of identification was provided to me or my Authorized Representative.

Signature: _____ Date: _____

An individual or entity who knowingly provides or utters a false or fraudulent mitigation verification form with the intent to obtain or receive a discount on an insurance premium to which the individual or entity is not entitled commits a misdemeanor of the first degree. (Section 627.711(7), Florida Statutes)

Inspectors Initials _____ Property Address_____

***This verification form is valid for up to five (5) years provided no material changes have been made to the structure.**

The definitions on this form are for inspection purposes only and cannot be used to certify any product or construction feature as offering protection from hurricanes.

Note: for underwriting purposes, your insurer may ask additional questions regarding your mitigated feature/s.

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Inspectors Initials _____ Property Address_____

***This verification form is valid for ~~up to~~ five (5) years provided no material changes have been made to the structure.**