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24 September 2014

Richard S. Browdy
FL Building Commission Chairman
6944 St. Augustine Road – Suites A&D
Jacksonville, FL 32217nhh

Dear Commissioner Browdy,

This letter is in reference to the proposed changes to the Florida Building Code - Energy Conservation that will eliminate the Section R110 Reporting requirements.

For over a decade the Shimberg Center for Housing Science of the Rinker School has been acting as the “entity representing the FBC” for the purposes of receiving the reporting section of the forms from the local building officials. Up to 1 July 2013, the State of Florida was funding the cost of one student to perform a statistical sampling of the forms, the manual entry of the contents in a database and the production of yearly, cumulative report analyzing the data collected over the years. As of 1 July 2013 the Masonry Association of Florida (MAF) has become the primary entity funding this effort. The data collected is very valuable and regularly requested and used by the MAF as well as others for research purposes.

We thought that we had averted disaster when the FBC had a hearing on Modification 5058 proposed by Ann Stanton of DBPR to carry the language forward from the 2010 FBCEC. At the hearings a BOAF representative opposed the change stating nobody used the information. Pat McLaughlin of MAF testified that the concrete and masonry industries used the data and it was of high value to the industry. The BOAF representative withdrew their objection since the data was being used. The Commission then unanimously approved the modification.

To our surprise we recently found out about the proposed elimination of Section R110. We think eliminating the reporting requirement would be a grave mistake, since the data capture and analysis process is happening at no cost to the State of Florida (courtesy of MAF). Additionally, this information is likely to play a key role in future reduction of energy use in Florida’s residential sector. Hence, we respectfully request relief from the FBC in the form of a reinstatement of Section R110 and the associated Appendix A.

Please do not hesitate to contact me, if I can provide you with any additional information.

Sincerely,



R. Raymond Issa, Ph.D., J.D., P.E., F.ASCE, API
UF Research Foundation and Holland Professor and Director
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