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Sent: Friday, April 10, 2020 9:01 AM
To: Campbell, Thomas
Cc: Madani, Mo
Subject: Opinion on the delay of the building code update for consideration

To the Florida Building Commission C/O Thomas Campbell, Executive Director:

I hope all are well. I am aware that there was a request to delay the upcoming building code update. I am against this request and offer the following insight for your consideration.

1. As an engineer licensed in over 40 states in the US designing as much out-of-state as in-state, I can attest that the use of ASCE 7-16 and other updated referenced standards is fast becoming out of sync with Florida's current codes. A delay would put us further behind the improved design standards and put upcoming designs in potential peril from design events. There are already increasing costs to manufacturers to maintain multiple versions of evaluations for different codes/states to which a delay will magnify.
2. Other entities such as Texas Department of Insurance has recently adopted IBC 2018 which many Florida Product Approvals are also submitted to. Delaying the Florida Building Code creates administrative issues with managing two different approvals for extended periods for the same product as well as future synchronization issues that also increases cost to manufacturers. ICC reports and engineering evaluations prepared for other states will also suffer this consequence.
3. Delaying the code adoption would shorten the next code cycle which will increase design and manufacturing costs of products to accommodate a shortened code cycle. Decisions for return on investment for manufacturers changes with a shorter product approval life spans.
4. It may appear that delaying the code would delay funds manufacturers would spend on updates, but to that I offer the following:
 - a. The state has already eliminated the application fee for this time period, thus providing significant savings to manufacturers.
 - b. There are as many manufacturers who have tested, rebranded, and desire changes to their approvals to provide more installation options, better spans, and cost-saving anchorage. These manufacturers have been delaying implementation until the code update. An update delay will cost them hardship
 1. One such example is Stanley/DeWalt who has purchased Elco and Powers Anchors. DeWalt has rebranded these anchors and the old brand names still appear on current approvals. These approvals need to be updated to reflect these brand changes to avoid mass confusion with building inspectors and when ordering from supply warehouses and big-box stores. Significant efforts have already begun and money spent training, informing, and marketing the new brand names.

2. Many other industry examples exist such as this with manufacturers electing to wait until the new code cycle rather than updating twice. Delaying will cause many to have to do so and cost them more money and confusion.
- c. This would be the time evaluation entities (engineers, architects) would offer the best value for updating and need the work to sustain. If the economy gets worse and a delayed date is set, evaluators would be more inclined to stick to higher fees to keep business going knowing they are likely to be accepted, and with reduced staff to do so. Right now there's a spirit of comradery and helping clients that may not be as prominent with a 3-6 month delay. Engineering fees to manufacturers to update are insignificant relative to other costs in the manufacturing chain.
- d. By keeping the current schedule, the Commission is doing their part to ensure the best interest of the GDP of the state and in keeping the economy going. Funds received for updates would pay engineers and retain staff to in turn serve the manufacturers that need them, thus providing value back to manufacturers that produce products that get purchased, completing the economic cycle.
- e. Many quotes from evaluation entities have already been sent, some signed, work started, and campaigns launched to begin the update process that's been established for some time. There is as much hardship to manufacturers, engineers, and industry in resetting this process including the Commission and updating timelines as would be keeping the current schedule.

In summary, delaying the code update only procrastinates the inevitable and puts the general public at greater risk by delaying code improvements and implementing safety and technological improvements that create stronger structures. Costs to manufacturers and the general public overall will rise, not flatten. The upside does not outweigh the downside.

Thank you for your consideration.

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