



July 27, 2009

Florida Building Commission
C/O Florida Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

Subject: Approval of IAPMO ES as an Evaluation Entity

Dear Florida Building Commission

Product evaluation agencies perform an important, necessary service for the building industry. They evaluate innovative products that are not covered in the building code, with consideration of code intent and public safety, and ultimately they issue product evaluation reports. These reports are only issued after a thorough review of product compliance with the appropriate criteria, code requirements, test data and calculations. IAPMO ES and ICC-ES use Acceptance or Evaluation Criteria (e.g., AC or EC), to evaluate products, which were developed in the public arena to ensure experts provide input towards their development.

Simpson Strong-Tie has evaluation reports with both ICC-ES and IAPMO ES and is confident in each of their product review capabilities. They are both non-governmental businesses and both have the same ANSI accreditation for reviewing building products.

IAPMO ES has been evaluating plumbing and mechanical products for more than 80 years, and in January of 2004 they began reviewing architectural and structural building products. For architectural product reviews, IAPMO ES contracts to outside experts experienced with that type of product. For structural product reviews, IAPMO ES contracts to outside, licensed structural engineers experienced with that type of construction. ICC-ES product reviews are performed by in-house staff, who sometime consults with outside experts.

It has come to our attention that one manufacturer is opposed to approval of IAPMO ES because they use outside technical staff to review products, and because they have used ICC-ES acceptance criteria in their product evaluations. We think both of these are good reasons that IAPMO ES should be approved. Using outside qualified experts and licensed structural engineers help ensure that proper reviews of technical material are performed. It should not matter, and some might argue that it is even preferred, that these technically knowledgeable, experienced reviewers are not direct employees of IAPMO ES.

Florida rules similarly permit licensed engineers and architects to perform product evaluation services. Similarly, if ICC-ES believes their publically developed Acceptance Criteria most closely reflect the requirements of the building code, then what other criteria would one use to provide an evaluation to that building code? IAPMO ES develops their own Evaluation Criteria, when necessary, and since it is developed in an open, public process, it should yield similar response and similar requirements as an ICC-ES Acceptance Criteria.

As expected, both agencies have challenges with technical review, consistency, and code intent as they apply to innovative building products. Fortunately, both IAPMO ES and ICC-ES have procedures whereby the information in a Criteria or Report may be revised if deemed inappropriate or in light of new research or analyses. For example, the manufacturer who is opposed to approval of IAPMO ES charges the misuse of an ICC-ES acceptance criterion. IAPMO ES has a link to a complaint form on the home page of their website, yet this manufacturer has not contacted IAPMO ES to make their concerns known. ICC-ES also has a complaint procedure.

Having used both ICC-ES and IAPMO ES, we have found the review provided by IAPMO ES to be fair and technically correct, and are comfortable with them for our reports.

As with any industry, Simpson Strong-Tie feels it is in the best interest of the building industry to have more than one review agency and therefore supports both IAPMO ES and ICC-ES.

Sincerely,
Simpson Strong-Tie Co., Inc.

A handwritten signature in black ink that reads "Ricardo Arevalo". The signature is written in a cursive, flowing style.

Ricardo Arevalo, P.E., S.E.
Vice President of Engineering
Simpson Strong-Tie

dw/PB,JE