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April 30, 2012

Agency Clerk  
Florida Building Commission  
Department of Business & Professional Regulation  
1940 North Monroe Street  
Tallahassee, FL 32399

RE: Petition for Declaratory Statement before the Florida Department of Business & Professional Regulation,  
DS 2012-021

Dear Ms. Ford,

The purpose of this letter is to inform you that CGI Windows and Doors, Inc. formally requests to be a party to the Petition for Declaratory Statement DS 2012-021 currently before the Florida Department of Business & Professional Regulation. We believe that CGI employees and customers have a substantial interest in the outcome of this declaratory statement as we manufacture impact aluminum windows and doors.

CGI Windows and Doors, Inc. has been a leader in the manufacturing of aluminum impact window and doors celebrating our 20 years in the industry this year. We constantly strive to improve our products' energy efficiency while maintaining an affordable product for the consumer. We believe that Declaratory Statement DS 2012-021 could impact our ability to sell our product line with respect to window replacements in existing homes and buildings if the 30 percent threshold with respect to renovations is not adhered to as provided in Florida Statutes and the 2010 *Florida Building Code*.

Specifically, we believe that Florida Statutes, Section 553.902, which defines "renovated buildings" to include a residential or nonresidential building undergoing alteration that varies or changes insulation, HVAC systems, water heating systems, or exterior envelope conditions, ***provided the estimated cost of renovation exceeds 30 percent of the assessed value of the structure*** should be strictly followed as the Legislature intended. Moreover, the 2010 *Florida Building Code* provisions that reference the same 30 percent threshold when renovating existing buildings—the definition of "renovations" in Chapter 2, 2010 *Florida Building Code—Energy Conservation* and Chapter 1, 2010 *Florida Building Code—Energy Conservation*, Section 101.4.1, Table 101.4.1, footnote d---should be maintained and applied, consistent with the statutory provision.

If Declaratory Statement DS 2012-021 is not approved to maintain the 30 percent threshold, CGI Windows and Doors, Inc. believes that the more expensive window as required by the 2010 *Florida Building Code—Energy Conservation*, Section 402.3.6, Replacement Fenestration would have a chilling effect on our company. Many consumers will find the more expensive window cost-prohibitive and will either decide not to replace their current window (with zero improvement in energy efficiency) or an underground market will emerge for unlicensed contracting activity to install less-expensive windows that meet the standard in place prior to implementation of the 2010 *Florida Building Code*.

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CGI Windows and Doors, Inc. would be substantially affected by the outcome of Declaratory Statement DS 2012-021 and thus, respectfully requests that the Energy Technical Advisory Committee and the Florida Building Commission approve the declaratory statement to allow the 30 percent threshold to remain in effect.

Sincerely yours,

A handwritten signature in blue ink, appearing to read 'Thomas G. Riscili', is written over a light blue horizontal line.

Thomas G. Riscili, President and CEO  
CGI Windows  
10100 NW 25<sup>th</sup> Street, Miami, Fl. 33172  
Phone: 305 507 4460  
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Cc: Mo Madani, Florida Building Commission