



ALUMINUM EXTRUSION

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2540 Knights Station Road, Lakeland, Florida 33810
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May 8, 2012

Agency Clerk
Florida Building Commission
Dept. 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 Keymark Corporation, Lakeland, FL, formally requests to be a party to Petition for Declaratory Statement DS 2012-021 currently before the Florida Department of Business & Professional Regulation. We believe that Keymark Corporation has a vested interest in the outcome of this declaratory statement as we manufacture aluminum extrusions and provide them to manufacturers of windows and doors in the state of Florida.

Specifically, we believe that Florida Statutes, Section 553.902, which defines “renovated buildings” to include a residential or non-residential 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.

Keymark Corporation believes that the more expensive windows as required by the 2010 Florida Building Code—Energy Conservation, Section 402.3.6, Replacement Fenestration will have a negative effect on the aluminum window and door industry as consumers will find the more expensive windows cost prohibitive and will decide not to replace their current window; thus, no improvement to energy efficiencies.



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Keymark Corporation and our customers 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.

Respectfully,

Brent Slaton
National Sales Coordinator
Keymark Corporation
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"The Aluminum Extrusion Supplier of Choice"

www.keymarkcorp.com