

July 23, 2015

Florida Department of Business and
Professional Regulations
Florida Building Commission
Attn: Building Structural TAC
1940 North Monroe Street
Tallahassee, Florida 32399

Members of the TAC Committee:

The Florida Independent Concrete and Associated Products Association, Inc. represents the family owned and independently run businesses that produce our state's Ready-Mix Concrete and Concrete Block Industry. Many of our companies have ties that go back generations. We believe it is our duty and responsibility to do our part in informing the TAC, and the Florida Building Commission, when an issue arises that will adversely affect the consumer, the industry, and the state's economy, should it not be resolved.

On August 6th the Building Structural Technical Advisory Committee is scheduled to evaluate requests for a Declaratory Statement and an Emergency Rule regarding the usage of stucco. The purpose of those requests is to avert any deficient applications that might result from the recently enacted Building Codes, R703.6.4 Application and R703.6.5 Curing. We are writing in order to endorse any efforts aimed at reevaluating and rewriting those provisions.

The current language is confusing, deficient and in dire need of amending. While it does recognize methods of application prescribed by the American Society for Testing and Materials as the gold standard, it also directs alternative applications which could jeopardize stucco's effectiveness. It would be in the best interest of all concerned should the TAC recommend and the FBC concur, to revert solely to the ASTM's guidelines.

We are a Florida based manufacturing industry that is critical to the viability of our State's economic engine. It is only recently that we have begun to see some signs of an established recovery. Inadequate application will have detrimental effects for all concerned. We appreciate your consideration and please let us know if there any further information you might need.

Sincerely,

Michele Stropoli

Michele Stropoli
Executive Director