

**HR Engineering, Inc.**

1541 E. Market St.
York, PA 17403

26 June 2018

Mo Madani, Technical Director
Building Codes and Standards Office
Florida Department of Business and
Professional Regulations
<http://www.floridabuilding.org>
mo.madani@myfloridalicense.com

Re: Proposed changes to the State Product Approval rules and processes


Dear Mr. Madani;

This is in response to your request that we provide to you our comments/feedback on the proposed changes to the State Product Approval rules and processes. I will limit my comments to areas of the approval process that I am familiar with. In the 14 states that I am licensed in, they all place the ultimate responsibility of approval of products installed on the exterior of buildings with the local building code official in that jurisdiction. In 13 of those states provisions are in place for one engineer, using his professional judgement, to assist with approvals. In Florida, it requires 3 engineers to achieve the same result; one responsible for the testing, one responsible for the evaluation report, and one to review all the engineering work. Florida has by far the best and most thorough approval system.

From my experience, Florida suffers more than any other state with dishonest and unethical practices. No amount of additional rules will help this. Those who want to be dishonest will always find a way to do it. What additional rules will do is require engineers to follow a list of rules instead of use their professional judgement. There is already too much of this in Florida. No one person can possibly be familiar with all of the many products that your department must deal with. The more rules we must follow, the lower the quality of our work will be.

In conclusion, I am against the approach being presented in the proposed changes. I suggest that we concentrate on getting honesty and ethics into the construction industry in Florida. It is my intention to attend the meeting on 14 August 2018. I look forward to seeing you there.

Sincerely yours,


Allen N. Reeves, P.E., SECB

ANR:anr

Cc: Ahmad Nana, and Ted Berman