From:	Randy Shackelford
To:	Madani, Mo
Cc:	Keith Cullum
Subject:	Comment on Product Approval Entity Forum
Date:	Thursday, August 02, 2018 8:41:03 PM

Mr. Madani-

Thank you for the opportunity to comment on the report of the "Product Approval Entity Forum….". Simpson Strong-Tie, as a long-time user of the Florida State Product Approval system, has the following comments:

1. We agree that Items 1 and 2 warrant further study and possible changes to the rule. Manufacturers should not be able to upload installation instructions or other documents that are not substantiated by the certification. Installation instructions need to reflect how the product was tested.
2. For items 3 and 4, we have no opinion. The engineer or architect writing an evaluation report is responsible for the contents of that report, and they should be the ones responsible for making it usable.
3. For item 5, no opinion. We have not seen an example of this.
4. For item 6, we wholeheartedly disagree with the suggestion to do away with the 10 day approval cycle. This has seemed to work well, and is needed by manufacturers with innovative products that are trying to quickly get them to market. We do agree that it could be made clearer that there is opportunity to provide comments on the 10 day approvals during the regular POC cycle. The validator needs to be the one checking that the installation instructions match up with the certification.
5. For item 7, the State Product Approval system is separate from the local inspection system. Inspection can not be addressed in the Product Approval rule.
6. For items 8, 9 and 10 we have no opinion. We would need to see examples of the source of the concern.
7. For item 11, while we have not always agreed with the resolution of comments, the current system seems to be working and appears to be fair to both the commenters and the applicants.
8. For item 12, this seems to be more related to the inspection side and does not need to be addressed in the Product Approval rule.

In conclusion, we stress the following two comments.

1. We support keeping the current 10-day process for certain approvals. We have not seen a problem with this process.
2. Some of these items that are inspection related are more of an educational issue and are not related to the Product Approval rule.

Thank you for accepting these comments.

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