



BOARD MEMBERS

Sue Schreiber, President
Kolbe & Kolbe Millwork Co., Inc.

Brad Fevold, Vice President
Marvin Windows & Doors

James Katsaros, Treasurer
DuPont

Dennis Chappell, Secretary
Shwinco

Jim Heise
PGT Industries

Jon Hill
Keystone Certifications, Inc.

John Holt
Solar-Tite, Inc.

Michael LaFevre
Lawson Industries, Inc.

Bill Longo
DAP Products

Steve Strawn, ex-officio

FENESTRATION MANUFACTURERS ASSOCIATION

1625 Summit Lake Drive, # 300 Tallahassee, FL 32317 (850) 402-2954

July 30, 2019

Mo Madani, Program Manager
Building Codes and Standards
Florida Department of Business and Professional Regulation
2601 Blair Stone Road
Tallahassee, Florida 32399
Mo.Madani@myfloridalicense.com

RE: University of Florida Water Research Study

Dear Mr. Madani:

The Fenestration Manufacturers Association has a deep appreciation and respect for the work the Florida Building Commission has done, and continues to do, in regards to the safety and quality of Florida's building standards. Our membership has been heavily invested in the conversation regarding research on the evaluation of the building envelope and water intrusion. FMA understands this research proposal will be discussed at the July 31, 2019 teleconference by the Water Resistance Workgroup and the Structural TAC. After careful review of the proposal, FMA would like to submit the below comments for consideration:

- The research limits its focus to the fenestration systems aspect and we would encourage the study to be expanded to the full building envelope and all its components rather than an isolation of variables.
- The reference standards do not match the established standards for testing as seen in Section 8.c. Purposeful testing above established industry design standards may skew the results and provide insufficient data for progressive resolve.
- The lack of forensic testing data to appropriately determine water penetration post Hurricane Irma fails to indicate fenestration systems as a weakness in water leakage occurrences. Moving forward on narrow testing parameters with a lack of complete data may result in substantial changes to the building codes and all related industries. We would encourage the gathering or completion of forensic testing to determine the source of water penetration in those buildings which identified water leakage post Hurricane Irma.

While the importance of this research is apparent, it may be too early to execute with the established scope of work, deliverables, and goals as listed in the proposal. The fenestration industry looks forward to the work and study to be conducted in this endeavor as a way to ensure and uphold the standards and codes set forth by the Florida Building Commission. FMA appreciates the opportunity to review the proposal and provide thoughtful discussion opportunities on this important work and look forward to working alongside the FBC in a supportive manner on this endeavor.

Best regards,

A handwritten signature in blue ink that reads 'Sue Schreiber'.

Sue Schreiber
FMA President