



TO: E. J. Carlson, Chair
Florida Building Commission
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BY ELECTRONIC MAIL
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October 3, 2018

FR: Jerry Vandewater, Crown Roof Tiles

RE: Adoption of ASCE 7-16

Crown Roof Tiles is a multi-national manufacturer of concrete roofing tile and related components with facilities in Arcadia, Florida, Mansfield, TX in addition to facilities in Mexico and the United Kingdom.

As members of the TRI, we support the position and questions raised by the tile industry and others for the delay of action and implementation of ASCE-7-16. The negative impact of the proposed change has been highlighted by our industry and others, but as much as Crown agrees wholeheartedly with the concerns of our TRI membership regarding the proposed changes we are concerned about the impact that this could have on the contractor base that we work closely with on a daily basis.

I personally have worked for over forty years in this industry as a roofer, manufacturer and building code advocate and I can attest to the impact that the TRI and its members have had on improving the standards and practices in our industry. The testing and training that has been undertaken by the TRI membership has been comprehensive and widespread. The solutions that have been developed to prevent the damage that used to be rampant during high wind events have effectively curtailed many of the previous problems and have been proven to be effective in their current form.

In addition to the extensive wind uplift testing performed by the TRI and its individual members, we have been more active than any other industry in providing ongoing training and certifications for our contractors and related trades. The TRI has worked closely with the FRSA and other roofing organizations around the country to increase awareness of code requirements and valid solutions and methods for improving our industry.

We have been proud of our record and the field evidence that has been compiled to prove the effectiveness of our ongoing efforts. The TRI has earned the confidence and support of the roofing community that has embraced the fastening methods that were developed and employed to great success. To enact unnecessary changes at this time would be immensely disruptive to both the roofers and builders who have been struggling to find enough qualified tradespeople to keep up with current demand.

The Florida building community has long been aware of the unique challenges of our State and have accepted the code changes that have evolved over the years but to introduce expensive new requirements at a time when roofers are finally confident in systems that have been established and shown to be effective, we think is not wise and will undo much of the good that has been accomplished in the past twenty five years.

Some of our specific concerns related to this matter include the following questions:

1. Has the commission considered any credible field data from more recent storms to evaluate the performance of roofs installed to the current ASCE 7-10 standard?

The feedback that we receive from our builders and contractors following these recent storms indicates comfort and confidence in the methods and materials currently being employed.

2. Has the commission done any work to determine the cost implications that would arise from the increased fastening and construction requirements?

While our anticipatory analysis shows some very real and predictable cost increases that would result from the proposed changes, our experience is that quite often there are unseen additional expenses and complications that can arise when due diligence is not fully employed prior to implementation of such broad changes.

3. Since training and education is a huge function of the TRI and its members, has the commission given any consideration to the cost and complexity of changing our curriculum and the confusion that would likely result in retraining our segment of the roofing industry?

The formal training and certification efforts provided by the TRI and FRSA members has been a critical factor in the improvement of construction practices in Florida. The costs involved in the preparation and dissemination of new information is not often recognized but it represents a significant cost in terms of time and resources required.

In summary, we as Crown Roof Tiles, a member of the TRI join with the other trade and construction associations in urging the commission to delay action on the implementation of the ASCE-7-16 at this time. We further ask that FBC staff be allowed to perform due diligence, cost analysis and work with those affected in Florida to develop a more efficient and cost-effective alternative for the FBC to consider.

Sincerely yours,

Jerry Vandewater



Technical Director
Crown Roof Tiles

cc: FBC Commissioners
Tom Campbell, Executive Director, Florida Building Commission
Mo Madani, Florida Building Commission