

Campbell, Thomas

From: Mark Smith <mark@bellconcreteproducts.com>
Sent: Friday, May 22, 2020 2:56 PM
To: Campbell, Thomas
Cc: Michele White (michele@ficap.org)
Subject: Implementation Delay

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To the Florida Building Commission C/O Thomas Campbell, Executive Director

We're writing to request the Commission remain on course to implement the FBC 7th Edition (2020) at midnight on December 31, 2020. Our association represents the interests of the Florida Independent Concrete producers and their suppliers. Many of our members utilize product approvals and we will have no hardship securing the necessary approvals because of the pandemic. It is our belief a delay could cause more harm than help and will cause undue stress to an already burdened industry.

- A delay will result in the delay of future Edition implementation dates. If not, we will have a 2-1/2 year interval between 7th and 8th Editions.
- A delay will hurt economically and engineers we've contacted do not support a delay.
- A number of Florida window manufacturers were contacted and stated they oppose a delay in implementation:
 - ASCE 7 changes do not affect windows structurally.
 - The code will continue to permit the use of older standards for windows.
 - Manufacturers have been aware of the need for some time and should already be in process.
 - The Product Approval Rule permits the use of equivalency.
- A delay would put Florida behind in design standards and code improvements.
- A delay will create problems for architects, engineers, builders, developers and manufacturers with operations outside the State of Florida.
- A delay will prevent the use of updated standards within the state.

- A delay will create an issue with coordination with the Florida Fire Prevention Code, 7th Edition (2020).

Please stay the course and implement the FBC 7th Edition (2020) at midnight on December 31, 2020.

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