Dear Representative \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_,

I am writing to express my opposition to and concern about HB 4648. This bill is essentially the same as the substitute for the failed HB 5376 of 2018. As such it is of questionable merit as the items within the bill have been previously discussed and were not enacted. While I do not disagree with the concept of having an advisory board give their input, and perhaps even an overall vote as part of the promulgation process for a code, I am concerned that the bill goes too far in its requirements.

Throughout the bill the word “each” is used extensively. This inherently infers that ALL changes that might occur within a given code would have to be evaluated under the parameters specified in the bill. This is problematic in that there are typically, within any revised code, literally hundreds of changes. These changes occur not only to the substantive content of such codes, but also to innocuous things such as section numbering and order, sequence, syntax, grammar, and punctuation. Unfortunately, the wording of the bill does not preclude the evaluation of such minor changes, and thus would pave the way for legal challenges by those who could maintain that the letter of the law had not been followed in doing the review. It would also be incredibly cumbersome to identify, evaluate, discuss, vote, tally, and post the results of such deliberations.

As for the appropriateness and need for evaluating items specified in the bill that require mandatory assessments for: Reason, Need, Impact, Economics, and Technical Feasibility, I am highly skeptical. Speaking from the perspective of a Michigan-licensed skilled trades professional (Electrical Journeyman) and educator who has dealt with the National Electrical Code for \_\_ years, I do not see the need for this evaluation to be done by an ad hoc committee of eight Michigan residents when such reviews have already been done by established code-making panels on a national level by hundreds of industry professionals. Those industry professionals, whose level of expertise and years of experience with regard to very specific topics that pertain to very specific sections of the Code, far surpasses anything that we would be able to muster as a State.

Regarding the concerns of some, relative to the increase in costs to implement a specific revision within a given code, I would point out that taken as a whole, revised codes often provide for overall reductions in costs as new, less expensive methods and materials are recognized and approved. It is therefore not possible to evaluate a single code change that would require a new, upgraded, or increased use of a product for its economic impact as is currently proposed in the bill. Throughout the arc of my own career I have seen this happen many times. Essentially, we do not do electrical installations in 2021 the same way that we did them in 1978 when I started. There are so many new code-approved means by which to do an installation that is faster and less expensive than the old way that were a contractor to try to do things the old-fashioned way they would soon be out of business.

I respectfully request your consideration of this matter and ask that you would join with me in opposition to this bill.

Sincerely,

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Electrical License #\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

### Whatever St.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, Michigan