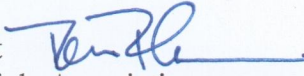




March 15, 2011

TO: Mr. Trevor Johnson, Hearing Officer  
Building Codes Division, State of Oregon

FROM: Tom Phillips, President   
Oregon Building Officials Association

RE: Proposed Rules on Implementation of HB 3462 – Specialized Inspector Certifications

On behalf of the Oregon Building Officials Association, we are in support of the proposed rules implementing HB 3463. We wholeheartedly supported the legislation that was approved by the 2009 Legislative Assembly and its primary purpose to provide additional options for building departments in terms of greater flexibility for training and educating building inspectors. It is our belief that the implementation of the legislation will provide more cost-effective and expedited service to our customers.

We applaud the efforts of the HB 3462 Phase II Rule Advisory Committee in the development of the proposed rules including the Purpose and Scope, Qualifications, Training and Examination Criteria for the proposed Specialized Solar and Plumbing Inspectors.

While not part of the official public hearing notice, we understand that the Building Codes Division is also interested in receiving input on the specific training hour requirements for the Solar PV and Plumbing certifications and the \$200 certification fee which covers all applications, training and certification costs. As an organization, we have not had an opportunity to discuss these items in detail. In general, the \$200 certification fee doesn't seem unreasonable nor does the proposed Minimum Training Requirements for the Specialized Solar Photo-Voltaic Inspector though there is some reservation about the practicality of requiring 8 electrical/structural inspections.

When discussing the proposed Minimum Training Requirements of the Specialized Plumbing Inspector certifications at our Annual Business Meeting and Fall Quarterly Business Meeting, we concluded that the proposed minimum 80 hours of training and 80 inspections are excessive and not reasonable, particularly for smaller jurisdictions. This conclusion is based on solid experience implementing the Residential Plumbing Training program that OBOA offers with the assistance of the plumbing industry in which inspectors must have previous experience and qualifications to be eligible to participate in the training program. We also believe that the number of inspections is unwarranted, again, based on the inspectors'

previous qualifications and experience, as well as impractical since most jurisdictions would not be able to provide the proposed number of field inspection opportunities.

We were under the opinion that the HB 3462 Phase II Rule Advisory Committee was to be reconvened last fall or winter to continue discussions on these training requirements. We believe that may be a more effective approach to finalizing the initial training requirements for the pilot training program.

Thank you for this opportunity to provide input on the proposed rules and we would be happy to respond to any questions you may have.