



Cynthia H. Maher, CAE, Executive Director

400 N. Walnut, Lansing, MI 48933  
PO Box 13100, Lansing, MI 48901 (mail address)  
(517) 484-5500 \* Fax (517) 484-5225

e-mail – [info@mpmca.org](mailto:info@mpmca.org)

website: [www.mpmca.org](http://www.mpmca.org)



Mr. Chairman and members of the committee my name is Cynthia Maher and I am representing the members of the Michigan Plumbing & Mechanical Contractors Association.

I want to thank you for allowing us time to comment on HB 4561 (H-1)

The Michigan Plumbing & Mechanical Contractors Association is opposed to the bill as passed by the House.

We have previously distributed language to the committee members to amend the bill. After speaking with the Michigan Association of Home Builders the language we suggest is: "**Amend HB 4561, H-1 by adding a new subsection: Page 4, Line 20, (7) -- This shall only apply to one-and two-family single unit dwellings and townhouses not more than three stories above-grade in height with a separate means of egress and their accessory structures**". This allows for the Michigan Plumbing Code (Commercial, Industrial, & Institutional Code) to remain at three year update cycle while the Michigan Residential Code update would be expanded to the six year cycle.

MPMCA can support the bill if this amendment is added.

If however the amendment is not added we respectfully ask you to oppose this bill for the following reasons:

- 1) The bill seeks to lengthen the time between required updates of all construction codes to six years from the current three years. The Michigan Plumbing & Mechanical Contractors Association members have overwhelmingly expressed their desire to remain on the **current three-year code cycle for all code revisions and updates**.

This will allow for Michigan to remain consistent with the national code cycles and be able to provide the latest technology available to customers and homeowners in order to save in both installation cost and long-term savings via reduced operating costs.

- 2) Some have said they don't want to purchase a new book every 3 years. Our contractor members don't see any hardship in spending \$300 on code books once **every three years** in order to remain up-to-date and be consistent with national codes and the accompanying updates in technology and safety. This is, to our member contractors, a cost of doing business and a very small one when you think in terms of once every three years.

Our members feel the language "not less than every six years and not more than every three years" in the current H-1 version is confusing and inconsistent and allows for too much discretion in the hands of the code enforcing agency instead of the legislature.

With a six year code change cycle, you have the potential for loss of technological advancement. This can stall distribution of safer products and/or more energy efficiency in products sold and

installed. Conversely, if a change or product made in a code is accepted and later found to be inconsistent or even unsafe, it could be up to six more years before it can be removed.

The promulgation of a rules takes at least one year to complete. This has the potential of placing Michigan at least seven years behind in the current code cycle and the rest of the country.

As I indicated earlier the Michigan Association of Home Builders is aware of and sensitive to our position and we have been working together to try to fix this issue.

Finally, if the suggested language cannot be added to HB 4561(H-1) then the Michigan Plumbing & Mechanical Contractors Association remains opposed to this bill.

Thank you for your time and consideration of our concerns.