

September 12, 2017

The Honorable James Randy Guy
President
St. Mary's Board of County Commissioners
Chesapeake Bldg.
41770 Baldrige Street
P.O. Box 653
Leonardtown, MD 20650-0653

Dear President Guy:

The Maryland Building Industry Association would like to propose for your consideration the following items as you adopt the Ordinance on Electric Service.

First, although codes and standards such as the National Electric Code (NEC) go through a deliberative, consensus process, they are not perfect and should not receive automatic County approval. The County should revise the proposed Ordinance (217-2 National Electric Code) to provide the opportunity at the local level to make worthwhile, commonsense corrections as needed that continue to provide safety.

For example, the following amendment to the 2017 National Electrical Code (NFPA 70) should be considered:

210.12 Arc-Fault Circuit-Interrupter Protection. Arc-fault circuit-interrupter protection shall be provided as required in 210.12(A), (B), and (C). The arc-fault circuit interrupter shall be installed in a readily accessible location. Exception: Arc-fault circuit interrupter protection shall not be required to be installed in one- and two-family dwellings.

Arc-Fault Circuit-Interrupter Protections (AFCIs) are meant to protect branch circuit wiring from inadvertent arcing, which can be a source of ignition, instead of protecting people from shock. Statistics released by the U.S. Consumer Product Safety Commission demonstrate that new homes don't even need AFCIs. The fires that AFCIs are designed to prevent occur overwhelmingly in older homes built to codes that are now outdated. Over the decades, numerous changes have been made in both the NEC and product safety standards to help avoid electrical fires in newer homes. For that reason, housing affordability advocates see AFCIs as a mandate that increases the cost of new homes unnecessarily.

Secondly with respect to Ordinance Section 217-5. Licenses, an exception should be made for low voltage contractors from the requirement that they work for a Master Electrician or train to become Mater Electricians. Contractors, who work with low voltage wiring, include installers of home automation and security systems. The work and training of these contractors is very different from that of a master electrician.

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The MBIA is a not-for-profit trade organization representing the interests of over 1,300 member firms and more than 100,000 employees, including home builders, remodelers, developers and affiliate professional and service providers in the Maryland Counties of Anne Arundel, Baltimore, Calvert, Carroll, Cecil, Charles, Harford, Montgomery, Prince George's and St. Mary's as well as Baltimore City, the Eastern Shore and Washington, DC. Online at www.marylandbuilders.org.

Based on the recommendation of CEDIA, an international trade organization that provides training and other services to the home technology industry, the following amendment is proposed.

Ordinance Section 217-5, .01 and 02 shall not apply to work done by:

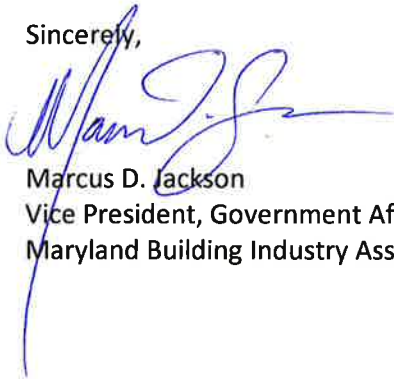
A contractor who is engaged in the design, installation, erection, repair, maintenance, or alteration of class two or class three remote control, signaling, or power-limited circuits, optical fiber cables or other cabling, or communications circuits, including raceways, as defined in the National Electrical Code for voice, video, audio, and data signals in residential or commercial premises.

If adopted, the proposed amendments should result in lower costs to home owners and others without reducing safety.

We have attached addition information from the National Association of Home Builders on Arc-fault circuit interrupter protection.

The Association appreciates this opportunity to provide these comments for your consideration. If you have any questions, please contact Annette Rosenblum, Director of Regulatory Affairs at (301)776-6242 or email her at the following address: arosenblum@marylandbuilders.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Marcus D. Jackson', is written over the typed name and title.

Marcus D. Jackson
Vice President, Government Affairs
Maryland Building Industry Association