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President Bradford H. Elliott HBA of Bucks/Montgomery Cos.	Vice President Stephen D. Black BIA of Lancaster County	Associate Vice President Rob Jones Central Susquehanna BA	Treasurer Kenneth L. Medina Lebanon County BA	Secretary Ray Fertig York County BA
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November 16, 2006

Mr. James M. Smith
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Subject: Regulation # 12-75 (IRRC # 2580)

Dear Mr. Smith:

We appreciate the opportunity to comment on Final-Omitted L&I Regulation # 12-75, pertaining to training and certification requirements for code administration; elevators and other lifting devices. These comments are needed to more comprehensively and accurately reflect the statute and amendments. We have provided our comments to the Department of Labor & Industry as well as the Committees.

Comment 1

Section 403.21(a) (6) (ii) – these provisions appears to only incorporate the provisions of the 1992 CABO Section R-213. as required by Section 7210.301 (a) (6) of Act 45. Section 7210.301 (a) (6) of Act 45 also requires the inclusion of exception 8 to section 1014.6 (relative to stairway treads and risers) of the 1993 BOCA National Building Code. This part is missing from the proposed regulations and should be added.

Comment 2

Additionally, 403.21 (d) is misleading. When reading this section one would assume these are the only prescriptive compliance paths to achieving energy compliance for detached residential buildings. By meeting the requirements of Chapter 11 of the IRC” needs added as an additional approved path.

We respectfully request that our comments be incorporated to the applicable sections of the regulation. Should you have any questions concerning our

comments please direct them to Douglas Meshaw at 717-730-4380 extension 3007
or at dmeshaw@pabuilders.org.

Sincerely,

A handwritten signature in black ink that reads "Brad Elliott". The signature is written in a cursive, flowing style.

Brad H. Elliott
President
Pennsylvania Builders Association

Cc: Edward Leister, Department of Labor and Industry
Frank Thompson, PBA
Joseph B. Scarnatti III, Senate Labor & Industry Committee
Robert Allen, House Labor Relations Committee