October 8, 2019

Justin Guedel
Deputy General Counsel
Indiana Department of Homeland Security
302 W. Washington Street
Indianapolis, IN 46204

Dear Attorney Guedel;

I understand that Indiana is moving forward to adopt the 2018 version of the International Residential Code (IRC), along with the requirement that AFCIs be required everywhere in a home except for bathrooms, garages and exterior locations. I am writing to respectfully request that the state slow this adoption and only move to require AFCIs in bedrooms, living rooms, dining rooms and other similar areas as required by the 2011 National Electrical Code. This measured adoption will allow Indiana homebuilders and electricians time to gain experience working with the products and help to determine if the added cost and potential inconvenience is worth the investment by homeowners.

There are countless examples of problems in other states which require AFCIs with nuisance tripping. Electricians report high numbers of callbacks to new homes to deal with faulty AFCIs and unhappy homeowners. We have heard that newer appliances, especially newer microwaves and refrigerators have been known to cause AFCI tripping. If a dual function GFCI/AFCI located on a breaker panel trips, a homeowner may not notice that it has tripped and that they have lost power to appliances that need constant power, such as their AC condensate pump, sump pump or freezer. This could result in extensive property damage and potential significant liability for electricians. Further, if the homeowner is not able to troubleshoot the cause of the trip, they will need to pay for a contractor to come and resolve it.

More than a dozen states have moved to limit AFCI requirements. I understand that South Carolina just moved to remove AFCI requirements from kitchens and laundry rooms because of concerns raised by electricians and contractors of nuisance tripping and required call backs.

Thank you for your time and attention to this letter. Please do not hesitate to contact me if you have any questions.

Sincerely,

Matt Kinder

General Manager
Kinder Electric Co, Inc.