My name is Lynn Madden. I am a Journeyman Carpenter and nationally Certified Building Inspector with 13 certifications in both residential and commercial construction, including Plan Review. I am a former Building Commissioner and Planning and Zoning Director and am currently employed by Hallmark Homes, a custom home builder. I also serve as Chairman for the Indiana Builders Association Codes & Safety Committee.

I appreciate being selected to serve on this code review committee as well as the two previous code review committees.

I think overall the code review process has yielded a good rule, but I do have two concerns about the review process:

1) This was a very fast paced review, and things were likely missed because of the volume of text that needed to be reviewed.

2) The fiscal impact is not accurate. The review committee was instructed to assign the fiscal impact of proposed code changes to the model code only and was told that another entity would calculate the cost of updating the code from the 2003 to the 2018. Those calculations were not done and will directly impact the cost of new construction.

In terms of the proposed requirements, I appreciate that the agency has removed the proposed code change to stair geometry since no evidence or documentation of slips, trips, or falls was presented to the committee as justification for the change.

I am most concerned about the proposed requirement to install arc-fault circuit interrupters (AFCI). The fiscal impact was based on 10 breakers in a panel box. As the code stands right now, every breaker would have to be an Arc Fault breaker. I don't know about you guys and your homes, but my panel box at my home has between 30 and 35. Even at a cost of $35 per breaker, that is triple the cost impact of what was provided to the review committee. I inspect every home we build and I can tell you, we have no houses that have only 10 breakers in the panel. If the house is being wired correctly, there should be between 30 and 35 breakers in a 2000 square foot home. If a home is total electric, there is a possibility of needing 2 panel boxes, with more than 40 breakers needed. Aside from the added cost, there is also concern about nuisance tripping. Per the

manufacturer's instructions, if one trips once, the homeowner can reset it, but if it trips more than once, a licensed electrician is required to check it out. Since there are no house police, I am sure we will have homeowners removing them and replacing them with a regular breaker, especially if they can't find anything wrong.

I urge the commission to consider deleting the requirement to install arc fault circuit interrupters, or at the very least limiting the requirement to bedrooms, as there was no Indiana-specific fire data presented to the review committee to justify the need for this product.

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