

From: [Elizabeth Jones](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 24, 2020 2:25:19 PM

From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission
Sent: Wednesday, June 24, 2020 2:13:48 PM (UTC-06:00) Central Time (US & Canada)
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS DEPARTMENT LICENSING AND REGULATION

First Name: David

Last Name: Glenn

Title: Senior Director of Government Relations

Organization you are affiliated with: Home Builders Association of Greater Austin

Email: david@hbaaustin.com

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:
June 16, 2020

Texas Sunset Commission
P.O. Box 13066
Austin, Texas 78711

RE: Texas Department of Licensing and Regulation Sunset Report

Dear Texas Sunset Commission,

Currently, the TDLR Air Conditioning and Refrigeration Licensing allows for testing on two mechanic codes - the Uniform Mechanical Code (UMC) and the International Mechanical Code (IMC). The HBA respectfully requests that the Sunset Commission bring forward rule and potential statutory changes that would direct TDLR to test to one code, the International Mechanical Code.

In central Texas, the IMC is the predominant code, with only the City of Austin utilizing the UMC. This creates a host of challenges for home builders in the Austin area. HVAC contractors must learn two separate codes in order to operate in Austin and the surrounding communities. Often times, the codes are in direct conflict of each other, adding unnecessary complexity to the construction process. Contractors cannot easily move between Austin and other cities without additional training, which makes their services more expensive to the end user.

Central Texas cities also face challenges because the region's largest city utilizes a conflicting code. There is a shortage of inspectors in the region and inspectors often move from city to city, where the need is the greatest. With two codes, it is more difficult for an inspector to move from city to city, making it more difficult for a city to scale up or scale down its inspection department and adjust for changing development patterns. Additionally, two codes create a tremendous administrative burden, requiring technical plan reviewers to be experts in both codes.

In short, there is no demonstrable upside to having multiple codes in central Texas. All of the challenges listed above will drive up the cost of housing and further exacerbate the region's affordability issues.

TDLR should consider and implement rules and legislative measures to incentivize cities to adopt the International Mechanical Code, including changes to the licensing and testing process. The HBA and our 700+ members appreciate the opportunity to provide comment on this important issue.

Sincerely,

David W. Glenn
Senior Director of Government Relations

Any Alternative or New Recommendations on This Agency: See letter above.

My Comment Will Be Made Public: I agree