

November 26, 2018

Ms. Jennifer Jones
Acting Director
Sunset Advisory Commission
PO Box 13066
Austin, Texas 78711

RE: Staff Report on Texas State Board of Plumbing Examiners

Dear Ms. Jones,

As a licensed plumber since 1984 and a past 12-year Board Member of the Texas State Board of Plumbing Examiners (TSBPE), I am in opposition to the Sunset Advisory Commission's report recommending the transfer of the regulation of plumbing to the Texas Department of Licensing and Regulation. I feel that important historical information was left out of the report.

Using natural disasters as part of a theory to dissolve the Board is both short sighted and disingenuous. It is only recently that school districts began reevaluating the importance of vocational education. The plumbing industry, as with many others, has an issue with a large number of workers being in the baby boomer age range. This is not strictly a plumbing industry issue. Dissolving the Board would not solve this problem.

There are areas in which the Board could improve and the plumbing industry would be more than pleased to assist in working with the Board on those improvements. However, to dissolve the Board and move it under another department would not be helpful nor would it affect the necessary changes.

The Sunset Report lists many issues but historical knowledge of the industry would show that many of those issues were actually solutions to previous problems raised by the industry. For example, the report recommends elimination of licenses of various names. The industry approached the Board and asked for specific licenses to be created. To simply eliminate them would create confusion in the industry and would likely result in requests to the Board asking for creation of the positions again. Take the Master Plumber License which is a contractor license. The 24-hour course requirement was implemented to ensure a plumber/master had the basic knowledge to become a contractor and knew what their responsibilities were. As a past Board Member I heard from countless licensees who would come in front of the Board and state that they didn't know the rules. As a Board we felt that distinguishing between these licenses would help make people aware of their responsibilities, and it did.

When the Sunset Report is reduced to its core, it is simply rearranging deck chairs to make it look like something has changed. The plumbing industry stands ready to help the Board eliminate and streamline regulations regarding testing and enforcement. However, to dissolve the Board and create an advisory committee is not helpful nor will it have a voice in regulating the industry that would be powerful enough to protect the health and safety of all Texans, which is the core tenet of the plumbing industry.

As a past two-term Board Member and a licensed plumber, I disagree with moving TSBPE under the Department of Licensing and Regulation. Please keep the Texas State Board of Plumbing Examiners as currently constructed and implement updated enforcement regulations.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard Lord', with a large, stylized loop at the end.

Richard Lord
Business Agent
Plumbers Local Union 68
United Association of Plumbers, Pipe Fitters, Welders, and Service Techs.