

RE: House Bill No. 2703

February 19, 2020

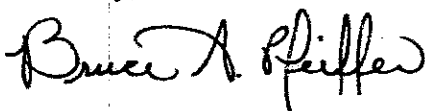
Bio: Bruce A. Pfeiffer – 40 years in the plumbing industry, Kansas Master Plumbing Certification, Member of Plumbers-Pipefitters UA Local 441, 27 years as Lead Plumbing Inspector for City of Topeka, Past President of International Plumbing and Mechanical Officials (IAPMO), Current Chairman of the Kansas Mechanical Trade Stakeholders

To Whom It May Concern:

I am speaking in opposition to House Bill No. 2703 for the following reasons:

- 1. Page 1, Line 7** – The list of “National Model Code” associations does not include the International Association of Plumbing and Mechanical Officials (IAPMO), the authors of the Uniform Plumbing and Uniform Mechanical Codes. Codes written by IAPMO, like those written by the National Fire Protection Association (NFPA) are American National Standards (ANSI). ANSI documents use a consensus process that includes input from all facets of the plumbing and mechanical industry in the code development process. Three of the four largest jurisdictions in the State of Kansas, Wichita, Kansas City and Topeka use the Uniform Plumbing Code and/or Uniform Mechanical Code as the model code(s) for their cities. Multiple other cities and towns are using one or both of these documents as their model code(s) including; Emporia, Hays, Pittsburg, Hiawatha, Atchison, Holton, and Great Bend.
- 2. Page 1, Line 11** – Underwriters Laboratory (UL) is not a code development organization. They develop standards, mostly for electrical and fire protection equipment, and tests those products to applicable manufacturing and installation standards. A majority of UL’s standards are recognized as American National Standards, using the consensus development process.
- 3. Page 2, Line 33-36** – Section 101.3 of both the Uniform Plumbing Code (UPC) and Mechanical Code (UMC) states that the purpose of the code is to “provide minimum requirements and standards for the protection of the public health, safety and welfare”. Many of the provisions found in the UPC and UMC, exceed the minimum state standards used for the construction and maintenance of state buildings. Jurisdictions adopting the UPC and UMC feel that the requirements found in those documents provide their constituents a far superior installation than those permitted by minimum state construction standards. By mandating jurisdictions to accept requirements below those adopted by their cities, the State would essentially be eliminating the “home-rule” by cities in regards to the construction industry.

Sincerely,



Bruce A. Pfeiffer
Chairman of the Kansas Mechanical Trade Stakeholders