



# Lightning Safety Alliance Corporation

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May 31, 2017

Mo Madani, Program Manager  
Building Codes and Standards  
Florida Department of Business and Professional Regulation  
2601 Blair Stone Road  
Tallahassee, Florida 32399

Richard S. Browdy  
Chairman, Florida Building Commission  
President, Browdy & Browdy, Inc.  
6944 St. Augustine Road , Suite D  
Jacksonville , Florida 32217

Re: Cost Impact Study regarding Building Code Changes specific to Lightning Protection in Mod E6460

Dear Director Madani and Chairman Browdy,

Attached please find our organization's letter to the author of the draft report "*Evaluation of the Cost Impact of Florida's Specific Changes to 2015 I-Codes 'Prospective Code Changes,'*" which was submitted to your organization last month.

As an organization comprised of lightning protection experts, technicians and designers we are alarmed that your organizations have been presented with inaccurate data that grossly overstates the cost of lightning protection systems by nearly ten times the true cost. Unless and until such time that the author can substantiate his figures, the lightning protection data in this report must be disregarded.

The 5% average cost for lightning protection claimed in the report is unreasonably high. It suggests that for a new building with a construction value of \$20 million the lightning protection system would cost \$1 million. There is no evidence of prices anywhere near that high in the actual marketplace.

We have asked the author to reveal the sources of his data and the basis on which his conclusions rest; until he produces this information, you are urged to disregard his data and conclusions and not rely upon it for any action regarding lightning protection regulations in the State of Florida.

We appreciate your consideration.

Sincerely,

A handwritten signature in black ink that reads 'Guy C Maxwell'. The signature is written in a cursive style with a large, looped 'G' and 'M'.

Guy C Maxwell  
President