



11 Robert Toner Blvd., # 234 | North Attleboro, MA 02763 | Phone: 508-839-3407 | www.acane.org

January 8, 2018

Charles Borstel, Commissioner
Division of Professional Licensure
1000 Washington Street, Suite 710
Boston, MA 02118-6100

Dear Commissioner Borstel,

The Air Conditioning Association of New England (ACA/NE) is concerned that the Board of Examiners of Sheet Metal Workers has again undertaken a review of the proposed Sheet Metal Code 271 Uniform Mechanical Code (UMC). ACA/NE believes that adopting the UMC is not consistent with the objectives of [Governor Baker's Executive Order 562](#) to reduce unnecessary cost, burden and complexity to the operation of government.

Currently, the regulations for sheet metal work performed in the Commonwealth utilize the 2009 International Mechanical Code (IMC) 271 CMR-2:00-9:00. This has been the case since 2010.

ACA/NE respectfully requests that the Board of Examiners of Sheet Metal Workers update to the 2015 International Mechanical Code (IMC), as per the requirements in 271 CMR 6.00: Uniform Sheet Metal Installation Rules. This states that "the following term, unless a contrary meaning is required by the context or is specifically prescribed, shall have the following meaning: International Mechanical Code: The version of the International Mechanical Code adopted by the Board of Building Regulations and Standards pursuant to 780 CMR 28.00."

The Board of Building Regulations and Standards (BBRS) adopted the 2015 IMC, effective October 20, 2017 with the concurrency period ending on January 1, 2018 when it is mandatory along with the IBC, IRC, & IEBC. The IECC was effective as of January 2, 2017.

Additionally, the Office of Public Safety and Inspections has already been providing training to Building Officials around Massachusetts using the 2015 update.

There is a clear need for regulatory consistency in the Commonwealth and ACA/NE, together with our building inspector partners, believe that the IMC with Massachusetts amendments makes more sense and would ensure that the code is in harmony and not in conflict with other current building codes.

Regards,

A handwritten signature in black ink that reads "Catherine A. Flaherty". The signature is written in a cursive style with a large, looped "C" at the beginning.

Catherine A. Flaherty
Executive Director

cc: Paul Moran, Chair, Board of Sheet Metal Workers
Richard Crowley, Board Of Building Regulations & Standards
Peter Kelley, Massachusetts Division of Professional Licensure
Robert Anderson, Department of Public Safety