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September 19, 2012

Shelby County Commissioners, Tennessee  
Shelby County Committee Room  
160 N. Main, Memphis TN, 38103

Dear Commissioners,

Thank you very much for the opportunity to offer written feedback on your consideration of changes to the county building codes.

NAMIC is the largest and most diverse national property/casualty insurance trade and political advocacy association in the United States. Its 1,400 member companies write all lines of property/casualty insurance business and include small, single-state, regional, and national carriers accounting for 50 percent of the automobile/ homeowners market and 31 percent of the business insurance market. NAMIC has been advocating for a strong and vibrant insurance industry since its inception in 1895.

NAMIC encourages you to adopt the strongest building code feasible for your residents, including immediate adoption of updates to the seismic provisions to the code.

NAMIC is a national leader on the subject of building codes, and coordinates the BuildStrong Coalition on Capitol Hill. ([www.buildstrongamerica.com](http://www.buildstrongamerica.com)) We believe that stronger building codes save lives, save property, and promote the longevity and prosperity of communities. NAMIC is advocating for the *Safe Building Code Incentive Act* (H.R. 2069) that would give a powerful incentive to states to adopt and enforce stronger statewide building codes. Under this Act, states that adopt and enforce nationally recognized model building codes for residential and commercial structures would qualify for an additional 4% of funding available for post-disaster grants from FEMA.

Study after study has shown that strong building codes produce remarkable economic benefits. A 2012 Milliman study found that H.R. 2069 would have saved US taxpayers \$11 Billion from 1988 to present had it been in place. In another assessment, The LSU Hurricane Center conducted a comparative analysis of the economic loss in Mississippi due to Hurricane Katrina, projecting a savings of \$3.1 billion if tougher building codes had been in place. In addition to saving lives and reducing property loss, building codes based on nationally recognized standards contribute to the durability of structures; and, in some locations, favorably affect the affordability and availability of insurance.

NAMIC encourages you to adopt as rigorous a code as you are able, including immediate implementation of all proposed updates before you.

If you have any questions or concerns, or would like to hear more about our efforts for strong building codes and the associated research, please do not hesitate to call on me.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Collins". The signature is fluid and cursive, with the first name "Erin" being more prominent than the last name "Collins".

Erin Collins  
State Affairs Manager