



Please submit response to:
Ryan Okey
Department of Pesticide Regulation
511 Westinghouse Road
Pendleton, SC 29670

Mr. Ted Miltiades, Director
Office of Construction Codes & Industrialized Buildings
Georgia Department of Community Affairs
60 Executive Park South NE
Atlanta, Georgia 30329

Dear Mr. Miltiades,

The Association of Structural Pest Control Regulatory Officials (ASPCRO) has been focusing on structural pest management issues including the inspection and control of termites since 1956. ASPCRO's membership is comprised of state pest control regulatory officials who are responsible for assuring consumer protection related to termite control and prevention. Each state has an agency that regulates pest management companies that provide termite control and many states have specific state regulations on termite inspections.

On behalf of the ASPCRO Board of Directors, I am writing in support of the Georgia Structural Pest Control Commission and Georgia Department of Agriculture's initiative to update the residential building codes with the Georgia Department of Community Affairs.

We strongly support this amendment for the following reasons:

- Termites cause more than \$5 billion in damage each year across the United States.
- Visual inspections, provide an accurate, first-line of protection, method of termite detection available to pest management professionals. Georgia, along with a number of other states, has specific laws regarding the performance of termite inspections requiring a visual inspection for evidence of termite infestation when completing the Georgia Wood Infestation Inspection Report.
- The proposed amendment allows for a visible inspection of the foundation and framing interface of a crawl space and basement construction. Visual access to foundation and framing interface is critical for effective subterranean termite inspections.
- The proposed amendment provides the best consumer protection. Visual access affords pest management professionals the best opportunity for early detection of termite infestation reducing the risk of costly damage and repairs.

Thank you for the consideration.

Sincerely,

Ryan Okey
ASPCRO, President
www.ASPCRO.org

cc: Mr. Derrick Lastinger