FLORIDA COMMISSION ON HURRICANE LOSS PROJECTION METHODOLOGY

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January 7, 2019

Dr. Shahid Hamid Florida International University International Hurricane Research Center 10800 SW 10th Street AHC 5, Room 222 Miami, Florida 33199

Dear Dr. Hamid:

The Florida Commission on Hurricane Loss Projection Methodology met today to review the Florida Public Hurricane Loss Model submission received under the 2017 Standards. The Commission deemed the following as deficiencies in your submission.

1. Standard G-1, Disclosure 4 (pages 76-96)

Incomplete as the South Florida Building Code 1961 and 1994 references cited in the submission are not given in the Vulnerability Standards reference list.

2. Standard G-3, Disclosure 5 (page 117)

Non-responsive as a description of the process for updating wind-borne debris and roughness ZIP Code-based databases is not given.

3. Standard V-1.E (page 186)

Incomplete regarding hurricane vulnerability functions.

4. Forms A-4A.C and D (Appendix G, page 408) and A-4B.C and D (Appendix H, page 429)

Non-responsive as a list of ZIP Codes for which there are hurricane loss costs but no exposure or a list of ZIP Codes for which there are no hurricane loss costs but there is exposure are not given or addressed.

Dr. Shahid Hamid Florida International University January 7, 2019 Page Two

On page 32 of the *Hurricane Standards Report of Activities as of November 1, 2017*, a deficiency is defined as a lack of required documentation. As stated on page 55 under the Process for Determining the Acceptability of a Computer Simulation Hurricane Model, "Failure of the modeling organization to correct any deficiencies or to submit Form S-6, Hypothetical Events for Sensitivity and Uncertainty Analysis, if required, within the time frame specified shall result in the termination of the review process."

Please provide the Commission with the information to correct the deficiencies noted above by Tuesday, January 22, 2019, 5:00 p.m. ET.

During the meeting, the Commission also identified the following issues to be discussed with the Professional Team during the on-site review and with the Commission during the meeting to review the model for acceptability.

- 1. For Standard V-1, Audit item 7, how the county as well as statewide building codes are reflected in the model vulnerability functions.
- 2. For Standard V-1, Audit item 9, how the building codes are reflected in the model vulnerability functions, including whether current statewide and county building codes are incorporated.
- 3. Justification if the high-velocity hurricane zone included in the statewide Florida Building Code is not reflected in the model vulnerability functions.
- 4. For Standard M-4, Audit item 8, the science underlying the maximum windspeeds in Form M-2.
- 5. Form A-6, Building Code/Enforcement (Year Built) Sensitivities, in particular for Manufactured Homes.

In addition, the Professional Team is charged to examine the Impact of Legal and Claims Environment as given on page 282 of the *Hurricane Standards Report of Activities as of November 1, 2017*. Specifically,

Investigate the impact of the legal and claims environment (e.g., assignment of benefits, attorney fees, increased litigation) on modeled hurricane loss costs and hurricane probable maximum loss levels. Is the impact of the legal and claims environment evident in the claims data provided to the modeling organizations for validation of the modeled hurricane loss costs and hurricane probable maximum loss levels? Should the impact of the legal and claims environment be incorporated in the hurricane model results, and if so, how? Should the impact of the legal and claims environment be incorporated into the hurricane standards?

If you have any questions, please contact me at (850) 413-1349.

Sincerely,

Donna Sirmons Staff

Florida Commission on Hurricane Loss Projection Methodology

cc: Floyd Yager, Chair