



February 21, 2020

Delegate Derek E. Davis, Chair
Delegate Kathleen M. Dumais, Vice Chair
Economic Matters Committee
Room 231
House Office Building
Annapolis, Maryland 21401

Re: CEDIA's opposition to House Bill 1127

Dear Chairman Davis, Vice Chair Dumais, and members of the committee:

On behalf of the Custom Electronic Design and Installation Association (CEDIA), thank you for allowing us the opportunity to provide written testimony opposing House Bill 1127, an Act concerning the Maryland Electricians Act of 2020.

CEDIA is the professional trade association of companies that specialize in designing and installing technology systems for the home. These systems include home networking, home automation and communication systems, media rooms, and single or multi-room entertainment systems.

CEDIA represents 22 Maryland-based member companies with bona fide qualifications and years of experience in this specialized, ever-changing and technology-driven field. CEDIA members include residential integrators, trade suppliers (manufacturers and distributors), industry-related professionals, and individual memberships. Our member companies range from small, independent electronic systems contracting firms to large multi-national manufacturers. Most CEDIA members are small, independent residential integrators with a strong entrepreneurial spirit. Residential integrators design, install, and integrate technology systems throughout the home and represent a vital part of the small business community throughout Maryland.

As introduced, House Bill 1127 has several consequences for the small businesses of residential integrators and the residential technology systems industry in Maryland and will add unneeded confusion into the marketplace.

CEDIA is requesting an amendment to exempt the work of residential integrators from the electrical licensing requirements for low-voltage work outlined in House Bill 1127.

House Bill 1127 does not make a proper distinction between the work of residential integrators on low-voltage technology systems and the work of electrical contractors on high-voltage electrical systems. The work of residential integrators is separate from the electrical trade and should not be have the same requirements of an electrical license.



By including the amendment for an exemption for Class 2 and Class 3 circuits, this makes a proper distinction between the work of residential integrators and high-voltage electricians. Several states use Class 2 and Class 3 circuits as an exemption to differentiate between the work of residential integrators and electrical contractors.

CEDIA supports licensing for residential integrators when the license properly represents the specific skills for the work they complete. As introduced, House Bill 1127 does not make a proper distinction between low-voltage electronic systems work and electrical contracting work. In its current form, House Bill 1127 would place a severe burden on residential integrators by forcing them to be licensed as electrical contractors and obtain a license that does not properly address their trade. The work of residential integrators is a separate trade from electrical contractors and should not require an electrical license and requirements.

Other areas that need to be addressed within House Bill 1127 are:

The term "Licensed Low-Voltage Electrician" is problematic and will add confusion in the marketplace. The work of residential integrators is separate from the electrical trade and a low-voltage license should not be referenced as an electrical license. The education and training are different for both trades and the statewide license should respect this difference. This is vital for the consumers of Maryland to differentiate between the two trades and services provided.

The definition of "provide low-voltage electrical services" (Page 4, lines 11 - 30) is problematic. This definition would force residential integrators working throughout Maryland to become or hire an electrical contractor to continue doing the work they have been trained to do for years. This definition will have a significant impact by increasing the cost of residential projects and determine who can work on residential electronic systems projects throughout Maryland.

Another area of concern within House Bill 1127 is the bill has only one seat on the State Board for someone who works in the low-voltage industry. This is not proper representation for an industry that has numerous segments that make up this growing industry. The low-voltage industry needs a stronger voice on the State Board so the Board is aware of technology advances within the low-voltage field.

Furthermore House Bill 1127 would limit the growth of the residential technology systems industry by the state only giving examinations at least twice a year, allowing a 45 day waiting period for results, and requiring the completion of 432 classroom hours and a 6,000 hour apprenticeship program to enter the low-voltage industry.

For the growth of the residential technology systems industry CEDIA would encourage the low-voltage exam be given at least on a monthly basis or utilize a testing center. Have a 30 day waiting period for exam results. The currently low-voltage requirements of 432 classroom hours and a 6,000 hour (3 year) apprenticeship program is a very high bar and does not respect the educational and training needs of the low-voltage industry. Education and training are important, but continuing education on technology applications is more important for our members to meet the needs of their clients. CEDIA would encourage 120 classroom hours and 3,000 hours of work experience for the low-voltage trade.

For these many concerns, CEDIA asks for support to include the amendment for a Class 2 and Class 3 circuits exemption in House Bill 1127 or for an unfavorable vote on House Bill 1127.

On behalf of CEDIA and our Maryland-based members, thank you for the opportunity to voice our concerns with House Bill 1127 in its current form. CEDIA looks forward to working with Chairman Davis, Vice Chair Dumais, members of the Economic Matters Committee, staff and other industry stakeholders to address our many concerns with House Bill 1127. Thank you for your time and consideration on this important issue.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Darren Reaman". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

Darren Reaman
Director of Government Affairs
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Enc: Maryland House Bill 1127 Amendment



HOUSE BILL 1127

“An Act concerning Maryland Electricians Act of 2020”

AMENDMENT

Exemption for Low-Voltage Services

Insert new (V) on Page 13, after line 4:

(b) This subtitle does not require:

(3) A person to hold a license issued by the State Board if the person:

(V) **Provides the design, installation, erection, repair, maintenance, or alteration of class two or class three remote control, signaling, or power-limited circuits, optical fiber cables or other cabling, or communications circuits, including raceways, as defined by the National Electrical Code for voice, video, audio, and data signals in residential or commercial premises.**

