



## Statement on 2021 Maryland House Bill 1262 Proposal

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Delegate Dereck Davis, Chair  
Delegate Kathleen Dumais, Vice Chair  
House Economic Matters Committee (ECM)  
6 Bladen Street  
House Office Building, Room 231  
Annapolis, Maryland 21401

### Re: **CCCA Position on HB 1262: Favorable with Amendment (Opposed as is)**

Dear Chairman Davis, Vice Chair Dumais, and Members of the Committee –

On behalf of the members of the Communications Cable & Connectivity Association (CCCA), we greatly appreciate being a part of this important dialog during your legislative cycles in 2020 and 2021. Here is our written testimony, along with the proposed amendments on House Bill 1262, an Act concerning revisions to the Maryland Electricians Act.

CCCA is also aware of many other Trade Associations and entities that share these same positions, on behalf of “Integrators”, who install low energy cabling and equipment per the Class 2 and Class 3 requirements in the NFPA 70, National Electrical Code®.

#### Executive Summary:

- The Communications Cable & Connectivity Association represents tens of thousands of installers and company employees along with some prominent manufacturers and suppliers, in the State of Maryland, of information technologies and infrastructure that support the emerging and robust growth of SMART and sustainable communities for our future. These critical systems of cabling and equipment are listed and safely connected by limited energy integrators on a daily basis around the country. This is a very different trade from the skills required of traditional licensed electricians, who are making direct connections to the higher power output electrical grid.

## Request for Mutual Dialogue and Trade Association Collaboration

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- I am also providing a consistent message, on behalf of the overwhelming majority of our Connected Technologies Trade Group. In fact, you will likely note in the written testimony records for House Bill 1262 the same “Favorable with Amendment” position being taken by multiple stakeholders. The amendment proposal has been entered into the written record by CCCA and several others.
- We very much favor the Bill’s objective of statewide licensing for all levels of electricians in the State of Maryland. We feel this is an effective way to expand job opportunities across counties and adjacent other states through reciprocity. However, as written, this Bill provides unintended consequences, if enacted as is, for limited energy integrators. We simply need to provide the clarity and a good delineation for the work of limited energy integrators. We appreciate the consideration of future rules and regulations, but would much prefer it be done through legislation rather than regulations formulated by the Department.
- Our first proposed amendment provides a clear and concise definition for limited energy integrators within section 6-101.
- We also want to be clear that we support the continuation of registration of limited energy integrators at the local level, as you move forward for statewide licensure. We look forward to working with you on future Legislation in 2022 and beyond for the limited energy services industry. Our second proposed amendment in section 6-104 provides for the establishment of a work group, with defined representation, to recommend the appropriate criteria for individuals in the limited energy services industry in the State of Maryland.
- The provided Amendment will assist the State of Maryland with the appropriate definitions and differences between the traditional electrical and integrator work forces. Most importantly, it will provide for the necessary immediate job growth and appropriate requirements to attracting new and well-trained labor into these critical differentiated trades for the benefit of all Maryland communities!
- In conclusion, without our Amendments, House Bill 1262 would put an extreme strain on the ability of our Maryland workforce to meet the current and pending demands of 5G and other SMART and sustainable community requirements. By having broad, ambiguous definitions such as “provide electrical services” and excessive licensing requirements, this problematic language could force limited energy integrators to become Master or Journeyman Electricians to complete ANY project in Maryland.
- My complete rationale and contributions, along with the amendment language to HB 1262 can be read in the attachment and in my testimony below. I ask for the Committee’s support to include these Amendments.

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Testimony:

As introduced, HB 2762 has numerous consequences for the small businesses of commercial and residential Integrators in Maryland and will add confusion and unintended consequences for Contractors. CCCA opposes the legislation as drafted. However, CCCA and our members can support this legislation only if an Amendment is provided to exempt the work of limited energy Integrators from the electrical licensing and training requirements for low-voltage work outlined in HB 1262.

As we have testified in previous hearings and the MD Department of Labor workshop last year on this same subject, HB 1262 does not make the necessary delineation between the work of Integrators and the work of electrical contractors on high-voltage electrical systems connected to the grid. The work of limited energy integrators is separate from the electrical trade and should not have the same requirements of an electrical license.

The definition of “provide electrical services” (Page 4, lines 8 – 13) is not accurate to fit the definition of cabling & connectivity equipment infrastructure, now and into the future. This definition would force limited energy integrators working throughout Maryland to become an electrical Contractor to continue the work they have been trained to do safely for many years. This definition will have a significant impact by increasing the cost of commercial and residential projects and determine who can work on information technology systems projects throughout Maryland. In addition, **this would put an extreme strain on the ability of our Maryland workforce to meet the current and pending demands of 5G and other “SMART” city / community requirements.**

The term “Licensed Low-Voltage Electrician” (Page 6, 25 - 29) is not appropriate and will certainly cause confusion in the marketplace. The work of limited energy 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.

It is vital for the consumers of Maryland to differentiate between the two trades and services provided. It is important the legislature and not the Department of Labor adopt limited energy regulations and licensing requirements for Integrators. The work of limited energy Integrators should not be bundled into a single Board of Electricians containing insufficient representation with the necessary knowledge of the information technology systems Integrator trade.

This House Bill has no representation on the State Board for limited energy Integrators. This is not proper representation for this critical, growing industry. The Board currently would determine the subjects of the low-voltage exam without any proper representation of the low-voltage profession. In addition, HB 1262 would place a severe burden on limited energy Integrators by forcing them to meet the excessive master electrician experience requirements and obtain a statewide license which does not properly represent their profession.

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The legislation would also limit the growth of the information technology systems industry with the State only giving examinations at least twice a year. For the growth of the information technology system industry, CCCA encourages that the low-voltage exam be given at least monthly or utilize a testing center.

The current low-voltage requirements of 432 classroom hours and a 6,000 hour (3 year) apprenticeship program (Page 14, lines 6 – 11) are very high bars and does not respect the proper and appropriate 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.

The legislation also has no grandfathering clause for companies that have worked in the residential technology systems industry for many years. This legislation would also eliminate the three years of experience credit required (page 15). Furthermore, the legislation has an effective date of July 1, 2021 and this short timeframe will not allow many companies to prepare for the numerous requirements outlined in SB 762.

Another area of concern in House Bill 1262 is the requirement that a licensed master electrician or journeyman electrician “shall be present at each job site in which electrical services are provided.” This is a difficult requirement for limited energy Integrators as many are small businesses with limited staffs. As introduced, electricians are the only ones allowed to apply for permits for the many different projects that will now require an electrical permit. This will limit the number of projects completed throughout Maryland.

**By having broad definitions for “provide electrical services” and excessive licensing requirements, this problematic language would force limited energy Integrators to become master electricians or journeyman electricians to complete any project in Maryland.**

For these many concerns listed above, CCCA asks for support to include an amendment (enclosed) to House Bill 1262 to differentiate between the work of limited energy integrators and electricians in Maryland.

On behalf of CCCA and our Maryland-based members and Integrators, thank you for the opportunity to voice our concerns with House Bill 1262 in its current form. CCCA looks forward to working with Chairman Pinsky, Vice Chair Kagan, members of the Education, Health, and Environmental Affairs Committee, Staff and other industry stakeholders to address our concerns with HB 1262.

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Thank you for your time and consideration on this important issue.

Respectfully,



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Enclosed: Amendment for Maryland House Bill 1262

### About CCCA

CCCA was formed on the principle that the industry could be served and strengthened by leveraging the efforts of individual leading firms into a single “voice” and mission that would benefit the structured cabling community and its supply chain. Today, the association’s backbone is an active Board of Directors and working committees that manage the association, execute our mission and provide a platform for member benefits and initiatives.

### Mission Statement

CCCA is a major resource for well researched, fact-based information and education on the important issues, technologies and structured cabling products impacting the current and future needs of the building network and cabling infrastructure. CCCA is proactive in supporting and participating in codes and standards bodies and other trade, industry and safety organizations, which affect the quality, performance and societal needs of the structured cabling infrastructure.

CCCA focuses its mission on **“What You Need to Know”** to stay abreast and well-informed on topics and issues vital to the structured cabling and connectivity industry.

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For further information, visit the CCCA website [www.cccassoc.org](http://www.cccassoc.org) or contact David B. Kiddoo, Executive Director, at [dkiddoo@cccassoc.org](mailto:dkiddoo@cccassoc.org) or by phone at +1.410.353.3989