

February 12, 1992

**MEMORANDUM**

TO: Susan Stuntz  
FROM: Karen Fernicola Suhr *Ka...*  
RE: Dennis Dyer's proposal for state BCIA's

*yes* | This responds to your request for my reaction to Dennis Dyer's proposal to establish BCIA's in six New England states. I have not yet discussed the proposal with consultants; I first want to know if my thinking is along the right lines. Also, if we decide to pursue this, we could ask that the proposal be revised to reflect our suggestions before we share it with others.

In reviewing the proposal, I had four major concerns.

**o Membership**

*they have  
in some  
members  
consider  
suggested  
the phase  
Iff bill -* | The list of proposed members in each state obviously corresponds to organizations in which Dennis has relationships. However, I think the list misses the point. How "natural" would it be for retail grocers, merchants and hospitality industry associations to join an organization that advocates the "building systems approach"? What would logically motivate a chamber of commerce or a general business or industries association to be the "catalyst" for creation of such a group? Do these groups have an obvious business interest in promoting ventilation solutions?

*yes,  
although  
either  
could  
work -* | I'm also thinking about the reaction of the national BCIA board members to formation of such a group. If the state group calls itself a BCIA, and we expect it to coordinate its efforts with the national, I think it would have to more closely resemble the national. Perhaps an example of more logical core members of a state BCIA would be distributors of products produced by national BCIA members, or offices of national BCIA members that are located in the state.

**o Activities**

*both  
legis/ing  
and  
media* | The activities described in the proposed timeline seem to focus on expanding the membership of the group as widely as possible and conducting media campaigns directed toward the public. I thought the point of such a group would be primarily to influence the regulatory/legislative process in a state. I would suggest a less concerted effort to expand membership as quickly as possible (which could create an unwieldy group), more activities directed toward educating policymakers/legislators -- and perhaps a more modest media campaign.

**o Control**

There are lots of safeguards in the national BCIA to ensure that the focus remains on ventilation solutions and away from source control. What would the safeguards be in the proposed state coalition? The proposed initial members are mostly associations; however, associations' elected leadership often changes from year to year, and with changes in leadership often come changes in priorities. Would we be able to count on the proposed steering committee to steer the group in the right direction? I don't get a sense from the proposal that this question has been thought through.

**o Scope/Cost**

I'm not sure why we would be paying for all expenses associated with the coalition. If the members must pay dues to belong to the group, couldn't those dues be used, in part, to defray the costs of mailings, travel, telephone -- and the consultant's retainer? If no dues are assessed, and TI pays everything, how long will it be before that arrangement becomes widely known? How serious a group is it if the members are not asked to contribute to its operation?

In addition, there would be lots of expenses associated with the "IAQ expert" that would have to participate in and contribute to the group's activities and draft documents for the group. We'd have to pick those costs up, too, I would guess. Perhaps the national BCIA could contribute resources that would help defray the cost of operating a state group.

I agree with you that, if we do this, we should start with one state -- and, based on what I've observed so far, Massachusetts is as good a state as any in terms of IAQ legislation. However, I don't think that cutting the scope of the project by 5/6 will result in a commensurate reduction in its proposed cost!

**o Recommendations**

I think a state BCIA could be very useful in influencing state and perhaps local IAQ policies and legislation. Accordingly, I suggest that Dennis's proposal be modified in the following way:

- o The proposal should be confined to one state, with a corresponding decrease in cost. We also should try to get some sense of how much it would cost for the "IAQ expert" who would need to provide technical competence.

*Raise up Dept. - I think to encourage staff person from each group not be appropriate.*

*Dennis may not be aware of dues issue.*

*yes*

*not if Dennis has anything to say about it.*

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o The group should be composed of a more logical member base than currently proposed.

o The group's initial activities should probably be directed less toward increasing its membership and heightening public awareness, and more toward gaining credibility with policymakers/legislators.

o References to labor should be removed (per your suggestion).

After the proposal is revised, we could then share it with Sparber and Forscey for their suggestions.

Please let me know if you think this makes sense.

cc: M. Gleason

*Just  
SMS must  
clear w/SDE*