

Dear _____,

I write today as president and on behalf of the 5,100-member nonprofit Florida Water and Pollution Control Operators Association (FWPCOA) opposing the water/wastewater operator interstate licensing reciprocity provisions of House Bill (HB) 23: Water and Wastewater Facility Operators.

The FWPCOA was formed in 1940 for the express purpose of professionalizing Florida's water and wastewater operations through training and certification. Our volunteers developed and administered Florida's voluntary operator certification program for some 20 years before it was adopted by the legislature as mandatory in 1971. Since then, we have worked with the Florida Department of Environmental Protection (FDEP) and its predecessor agencies to update and enhance FDEP's training and licensing protocols, producing a Florida operator licensing system that is recognized as one of the strongest in the United States. Given the unique water supply and wastewater management challenges presented by Florida's growing population, our citizens deserve no less.

The FDEP's licensing examinations are the very heart of Florida's program. They are designed to assure that the men and women charged with operating these facilities fully understand and are prepared to respond instantaneously, at any hour of any day, to changing operational conditions that may threaten public health or the environment. Training and licensing exams focus on processes, procedures, equipment, and technologies most commonly used in Florida. Moreover, sections of each exam deal with Florida's public health and environmental regulations, which are clearly unique to the state. No Florida resident may legally lead a shift at any Florida public water supply, water distribution, or wastewater treatment facility without having demonstrated mastery of this subject matter by passing Florida's licensing exam; however, the reciprocity provisions of HB 23 will allow non-Florida residents to do so.

The FWPCOA is quite aware of the current nationwide labor shortage and the associated recruitment challenges it presents for certain water/sewer operator employers; however, its membership does not believe that waiving the operator's obligation to empirically demonstrate essential knowledge serves Florida's public health and environmental interest, nor does it believe that doing

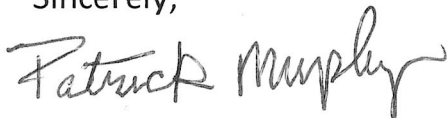
so will meaningfully address recruitment issues. Most water/sewer employers are aware that recruitment problems are less a supply than a demand issue and have adjusted their employment conditions to compete in a labor market that is increasingly challenging for all employers.

Summarizing, as the originator of Florida's existing water/wastewater operator licensing system, a nationwide model of which all Floridians can be proud, FWPCOA strongly opposes HB 23 in its current form, specifically the provisions that allow out-of-state operators to be licensed without having successfully completed FDEP's operator licensing examination.

We will be pleased and honored to assist in redrafting the bill to require FDEP to formalize a system for evaluating out-of-state credentials and exempting qualified applicants from lower certification level exams, but we cannot support any initiative that compels or allows licensing of out-of-state operators without successful completion of an FDEP water/wastewater operator examination.

Thank you for taking the time to read and consider FWPCOA's position. I hope that you will contact me if we can be of further assistance.

Sincerely,

A handwritten signature in dark ink, reading "Patrick Murphy". The signature is written in a cursive, flowing style with a large initial "P".

Patrick Murphy, President
FWPCOA