



**Date: February 1<sup>st</sup>, 2026**

**Subject: PA 407 Rule 309 (1) (d) Memo**

**To: LARA/Bureau of Construction Codes**

**From: Professional Code Services LLC (PCS LLC)**

**Proposed action: Modify language in Rule 309 (1) (d)**

**PCS LLC Proposed Language:**

**(d) Hold a mechanical contractor license from this state, including the classification of HVAC Equipment for a minimum of 1 year and 1 of the following classifications for a minimum of 1 year. ~~3 of the 4 following categories for at least 1 year immediately preceding application.~~**

- i. Hydronic heat and cooling and process piping. ~~A low-pressure or greater boiler installer license held by the applicant for a minimum of 1 year may be substituted for this requirement.~~**
- ii. Refrigeration**
- iii. Fire Suppression**

**Justification:**

This proposed rule language is in contradiction to Act 407 which does not contain language allowing for boiler installation experience to substitute for Article 8 mechanical classification 1 experience or vice-versa. Although "near" boiler piping on low pressure boilers does connect to hydronic system piping, experience, "setting and connecting" a boiler is not hydronic system piping experience nor is it equivalent to chilled water or process piping experience. Further, a mechanical contractor cannot sign off on work experience outside of their classifications: *Sec. 807. (1) An applicant is not eligible for a work classification examination under this article unless the applicant meets the requirements provided in article 2, is of good moral character, and meets 1 or more of the following: (a) Has a minimum of 3 years or 6,000 hours of experience in the work classification for which he or she is seeking a license, or an*

equivalent of that experience, that is acceptable to the board and shown to the department, in 1 or more of the work classifications described in subsection (2). For purposes of this subdivision, and except in the case of equivalent experience, an applicant must provide to the board and the department a statement signed under penalty of perjury from each contractor of record that is the present or former mechanical contractor employer of the applicant. The statement must indicate that the applicant has a minimum of 3 years or 6,000 hours of performance in each work classification for which the applicant is seeking a license and must include a detailed and specific description of the type of work performed by the applicant and the length of time he or she performed that work.

It is our position that; if the intent is to reduce qualification requirements for applicants wishing to test for Mechanical Inspector Registration, it must be done in accordance with the act and consistent with the practical knowledge base required for the scope of work a Mechanical Inspector would encounter in the discharge of his or her duties, to ensure the health, safety and welfare of the People of the State of Michigan. This can be accomplished simply by requiring the applicant to have HVAC Equipment and one of the other two installation classifications, as opposed to the previous requirement of “three of the four.”

**Petitioner:** *Matthew A. Gay*

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