



Date: February 1st, 2026

Subject: PA 407 Rule 400 (2) Memo

To: LARA/Bureau of Construction Codes

From: Professional Code Services LLC (PCS LLC)

Proposed action: Modify Language in Rule 400 (2)

PCS LLC Proposed Language:

2. If the individual does not hold a mechanical **contractor** license in this state, as specified in subrule (1)(d) of this rule, he or she shall provide to the department an affidavit of experience from previous and current employers. The affidavit must comply with both of the following:

a. Attest that the applicant has ~~been actively engaged~~ **experience** in the performance of mechanical work for 6 years **in each of these 3 categories below**, under a ~~licensed~~ mechanical contractor **licensed in accordance with subsection (2) (b) of this rule** in 3 of the 4 following categories:

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

b. Attest that the ~~licensed mechanical contractor or contractors who supervised the applicant were~~as licensed in the required category or categories at the time of supervision **licensed mechanical contractor or contractors, under whom the applicant worked, held at minimum of an HVAC Equipment Classification and at least one of the following classifications on his or her mechanical license during the work experience time period for which the applicant is requesting credit:**

- ii. **Hydronic Heating and cooling and Process piping**
- iii. **Refrigeration**
- iv. **Fire Suppression**

Justification:

This proposed rule language is in contradiction to Act 407 which does not have 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 registration as a Mechanical Plan Reviewer, it must be done in accordance with the act and consistent with the practical knowledge base required for the scope of work a Mechanical Plan Reviewer must have to ensure the health, safety and welfare of the People of the State of Michigan.

Petitioner: *Kevin D. Kalakay*

Chief Executive Officer

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