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Commissioners re: Docket 24-OIR-03,

I am writing regarding the proposal to track unit level sales. As a CA HVAC contractor, this would significantly incumber my business. It would add another layer of paperwork to an already full file system. In addition it would add multiple labor hours per week to complete the paperwork to stay in compliance, at least as far as I understand the proposal. I understand the desire to ensure permit compliance and I think permit compliance is good, but this is not going to fix permit compliance because those who want to find a way around it always will and the new rule to catch the contractors not operating as they should be ultimately becomes the rules that further burdens the contractors who are doing the right thing. At that point you are back to requiring external enforcement to catch them and you have created an addition speed bump to the success of the other contractors who follow the rules. Each municipality already has a function for achieving this goal and CSLB has the ability to enforce this as it is a requirement of being a licensed contractor. I do think Hardi's proposal is an more effective alternative. Nathan Datus