

**DOCKETED**

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## **Docket Number 19-BSTD-03**

I must strenuously object to the over reach of the NLCAA in having the ATT sign drawing and reports of a design done by a professional engineer. The NRCC is signed and sealed by the Engineer of Record, for the mechanical systems by the Mechanical engineer and for electrical and lighting by the Electrical engineer, or by the Designer of Record, the Architect for the building shell and envelope. This usurps the legal responsibility and authority of the professional engineer for the design, which violate the California Board Rules and the California Professional Engineers Act. This constitutes engineering design services without Professional Engineer license, a violation of the Professional Engineers Act unless they are also a California Professional Engineer "Electrical.

In most design bid build project the ATT is hired by the contractor after the permitting process so there may be different ATT for the construct than the design totally defeating the logic of this proposal.

As a California Registered Professional Engineer "Electrical must object to the placing of work of a professional engineer prepared under their "co-responsible charge" subjected to that of a non-register designer.

If the shop drawing preparation was required to signed by the ATT this wouldn't cross the boundary of the Professional Engineer's legal responsibility.

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