

The practice of Engineering encompasses many disciplines in general, with specific sub-disciplines within each. One such sub-discipline that is not represented within the subset of Mechanical Engineering is that of Plumbing.

At one time, Plumbing was attached to Mechanical Engineering as it was felt to be simplistic enough that any Mechanical Engineer with an ABET-accredited BSME degree could adequately handle the demands of the discipline. But, the discipline of Plumbing Engineering has become more complex than it once was. Consider: within the practice of Plumbing Engineering resides engineered systems such as domestic water (with specialized water systems such as softened, deionized, distilled and reverse osmosis water), sanitary waste and vent (again, with specialized wastes such as fats, oils and greases [FOG], medical and laboratory wastes), storm water waste, fuel gas (which includes natural gas, propane, fuel oil, gasoline and others), medical gas (which can encompass medical air, nitrogen, nitrous oxide, oxygen, medical instrument air, vacuum and waste anesthesia gas systems) laboratory gas (which can feature elements from fuel gas and medical systems) and rain/waste water reclamation systems. And with design and regulatory requirements that must be considered, Plumbing has achieved a complexity all its own.

With these various and complex Plumbing Systems engineers must routinely concern themselves with in today's practice of Engineering, it has become difficult, if not impossible, for the typical Registered Engineer who specializes in the HVAC discipline, to maintain the necessary level of competency in the Plumbing discipline. Yet, this does not address the reality that for the vast majority of these Registered Engineers, they are affixing their seal and signature to Plumbing drawings prepared by Plumbing Designers/Drafters without a full and necessary understanding as to what they are certifying they have full knowledge and understanding of. Clearly, this is a prime example of "Plan Stamping", which is a violation of the rules as established by the Board and clearly not in the interest of the welfare and safety of the public-at-large.

It is for these reasons that a Plumbing Option, placed within the framework of the Mechanical Engineering Principles and Practices examination, has become a necessity for the engineering community. This will insure that the Engineers sealing and signing Plumbing documents have a level of verifiable knowledge and competency of the discipline. And the welfare and safety of the public-at-large will be addressed and enhanced.

In closing, I urge the Board to support the inclusion of a Plumbing option within the Mechanical Engineering examination and to inform the National Council of Examination for Engineers and Surveyors (NCEES) of this support.

Thank you for your time and consideration.