March 23, 2020

Mr. Christopher C. Krebs Director, Cybersecurity and Infrastructure Security Agency United States Department of Homeland Security Washington, DC 20528

Dear Director Krebs:

The Plumbing Heating Cooling Contractors—National Association supports the inclusion of Plumbing and HVACR professionals as essential services for our nation during the current COVID-19 crisis. Our members provide services to maintain safe sources of potable water and proper disposal of wastewater to maintain hygienic conditions for American citizens.

Further, our contractor members ensure indoor climate conditions and indoor air quality promote healthy living, install and maintain medical gas systems in hospitals, and overall keep American families healthy and comfortable in homes, schools, and workplaces. They protect the health and safety of the American people.

PHCC suggests to the U.S. Department of Homeland Security that additional clarification be added to the March 19, 2020 *MEMORANDUM ON IDENTIFICATION OF ESSENTIAL CRITICAL INFRASTRUCTURE WORKERS DURING COVID-19 RESPONSE*. Our contractors believe that it is unclear that workers in the HVAC industry are included in this memorandum and that the language limits both plumbing and other essential services to residential occupancies.

PHCC would urge the Department to clarify:

- HVAC contractors are essential services
- Plumbing and HVACR essential services are residential, commercial, industrial, and institutional occupancies.
- Supply chains (including distribution centers) for plumbing, HVAC and other essential
 workers are deemed essential critical infrastructure to prevent disruptions due to supply
 shortages.

Contractors seek clarification on whether essential workers need documentation for use with authorities enforcing curfews or quarantines. Should essential workers:

- Operate company vehicles or be in possession of tools relative to their trade
- Carry documentation from DHS
- Carry any required plumbing or mechanical license
- Provide copies of service or work orders

During this ongoing crisis, facilities other than residential will continue to be needed for critical operations. Plumbing and HVACR contractors are positioned to respond to repair and maintain the systems of their clients who perform essential duties, these industry professionals do not wish to be in conflict with the necessary limitations placed upon the general population.

PHCC urges you to consider the work of America's plumbers and HVAC contractors as essential services for all occupancies that must be maintained during this time of crisis. Keeping Plumbers and HVACR contractors at work prevents exacerbating the current public health crisis.

Sincerely,

Michael Copp, MA, MIRM

PHCC Executive Vice President