



SOUTHERN PINE INSPECTION BUREAU, INC.



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Southern Pine Producers Lumber Industry Associates:

I would like to address the considerable misinformation which has been circulated regarding Southern Pine Inspection Bureau's roles and responsibilities in proposing new lumber design values for southern pine. SPIB plays a very limited and specific role in our industry. We are responsible for conducting the technical work for the industry which includes the setting of lumber grades and their associated design values and providing for third party quality audit programs at our subscriber mills to ensure they are meeting the published standards of the various grades. All of these activities are conducted under the regulatory umbrella of the American Lumber Standards Committee.

SPIB was created in 1940 as a result of an antitrust lawsuit filed by the United States Department of Justice against the Southern Pine Association. A consent decree was issued to settle the lawsuit which created an independent technical and lumber grading bureau (SPIB) and a separate "trade association" (now the Southern Forest Products Association) which would perform the marketing functions for the industry.

As noted above, a key responsibility of SPIB is to monitor lumber grades and strength properties. In-grade testing of full-sized southern pine lumber was initiated in the late 1970's to establish the global design values published in the 1991 and 2002 Standard Grading Rules for Southern Pine Lumber. Global design values for a lumber species are applicable to all of the population of a given lumber grade regardless of where in the growing region the lumber originates. By their very nature, global design values must be conservative to protect consumers due to the highly variable nature of wood.

Industry professionals and scientists from the USDA Forest Products Laboratory took a consensus approach to creating ASTM Standard D1990 which governed the testing and analysis of in-grade data. The procedures were explicit as to how lumber samples of all species were to be collected, tested and the data evaluated. ASTM D1990 also required that properties be reevaluated if there was sufficient reason to believe that a significant global change in lumber property values had occurred.

We were made aware of concerns during the summer of 2010 that published design values for visually graded lumber might not be accurate. If true, visually graded southern pine lumber could be "weaker" than expected, and serious performance issues could result. It is paramount that published strength properties for visually-graded southern pine be reliable for the design and construction of homes, apartments, hotels and schools.

The SPIB Board of Governors instructed the technical staff to initiate random testing to establish whether or not a substantive change had occurred and propose new design values if lumber property value changes were evident. The SPIB testing procedures were approved by

the USDA Forest Products Laboratory which has ultimate oversight in the testing of samples and the analysis of data. Test samples were taken from mills in all regions as directed by FPL. Testing was conducted over several months by SPIB and Timber Products Inspection. The collected data were analyzed by SPIB staff as prescribed by ASTM D1990 and the USDA Forest Products Laboratory's approved test protocol. 2x4 #2 common southern pine lumber was tested initially to measure property changes across the South. The 2x4 data suggested that significant property changes (as much as 30% lower) had occurred over time, and it was highly likely that substantial property changes would be found in the remaining test cells (2x4 #2 was one of the original six test cells). The property changes were so large, in fact, that modifications to the grading rules were deemed insufficient to overcome the measured decline in strength. The Board instructed staff to prepare new design values based on the empirical data and mathematical extrapolations of the data based on established and recognized computational processes set forth in D1990 as quickly as possible to prevent the misapplication of lumber.

The proposed design values were submitted to ALSC with a recommendation for adoption. The ALSC then forwarded the data to the USDA Forest Products Laboratory for verification of sampling procedures and test results. FPL acknowledged to ALSC in writing that the testing and analyses were done as prescribed.

Questions have been raised about timing, commercial concerns, and transparency. Some key points to consider:

- SPIB wrote a letter to our subscribers and various lumber organizations and published a notice on our web site in the summer of 2010 stating that we were testing lumber, and that designers and builders consider using machine stress rated lumber or be very conservative in engineering designs while lumber testing was ongoing.
- SPIB's role is strictly technical in nature. The initial testing indicated substantial reductions in lumber properties had occurred, and SPIB was obligated to propose new and reliable design values as quickly as possible. While commercial impacts from rapid deployment of new values are real, the "data are the data". Performance failure risks which might occur during a phased-in approach are for others to evaluate and accept.
- Commercial impacts are outside the scope of SPIB. The consent decree of 1940 clearly stated that marketing and commercial considerations were not a responsibility of the independent, testing bureau. In fact, those activities are prohibited.
- Determining the reasons that the changes occurred will require substantial study. They did not occur overnight, and they are the likely result of a number of factors. It is important that we understand the root causes, but the immediate response was to provide reliable lumber properties.

SPIB recommends that our subscribers and customers allow the ALSC process to work as prescribed. We need reliable design values published for proper engineering design and performance. We hope you will help us do that.

Jim

James E. Loy

President

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