

**TESTIMONY IN SUPPORT OF RAISED BILL No. 124 - AN ACT REQUIRING SMOKE  
DETECTORS IN RESIDENTIAL BUILDINGS**

**February 29, 2016**

Good afternoon Senator Larson, Representative Dargan, Senator Coleman, Representative Verrengia, Senator Guglielmo, Representative Zupkus and members of the Public Safety and Security Committee. Thank you for the opportunity to provide testimony on behalf of Imagineers, LLC (“Imagineers”).

I am Karl Kuegler, Jr. of Imagineers, LLC where I serve as the Director of Property Management for our common interest community management division. From our offices located in Hartford and Seymour, we serve about 210 Connecticut common interest communities comprising about 19,000 homes. Imagineers is registered with the Department of Consumer Protection as a Community Association Manager holding registration number 0001 and has been serving Connecticut common interest communities for 35 years. I have over 26 years of experience in common interest community management and hold a Certified Manager of Community Associations and Association Management Specialist designations from the National Board of Certification for Community Association Managers. Imagineers is a member of the Connecticut Chapter of Community Associations Institute. I serve on the organization’s Legislative Action Committee as its vice chair and chair the organization’s annual state educational conference.

Imagineers supports the increased safety that the bill seeks to afford residents of multifamily residential homes; however, we believe that further clarification be made regarding its impact on common interest communities. Common interest communities in our state, which comprise condominiums, planned unit developments and cooperatives, are organized and owned distinctly differently than apartment type housing. Although a unit owner of a condominium or a planned community typically owns the inside of their unit, the common areas such as hallways and entryways are owned in common by all unit owners as tenants in common. In the case of a cooperative, units are owned by the cooperative and the unit owner has exclusive use of their unit. In both situations, the unit owner is typically responsible for the care and maintenance of the smoke detectors in their respective unit. Compounding the matter is that many condominiums are owned by investors that in turn rent the unit to a tenant. The language of the bill specifically referencing the “owner of a residential building” creates some concern in determining who would be considered responsible for the installation and maintenance of the smoke detectors. The vast majority of common interest communities do not have ready access to the individual units to install or maintain smoke detectors. Access has to be provided by the owner of the respective unit. This lack of access would also make it not feasible for common interest communities to inspect units for the existence and condition of the smoke detectors.

Again, we share the commitment to laws and policies that help increase the safety of the residents of the communities in our state.

For the reasons stated above and providing that revisions are made to the text of the legislation to address the concerns raised, we are in support of Raised Bill No. 124 - An Act Requiring Smoke Detectors in Residential Buildings.