

SCHEDULE 14A
SCHEDULE 14 INFORMATION

Proxy Statement Pursuant to Section 14(a) of the Securities
Exchange Act of 1934

Filed by the Registrant []

Filed by a Party other than the Registrant [x]

Check the appropriate box:

Preliminary Proxy Statement

Definitive Proxy Statement

Definitive Additional Materials

Soliciting Material Pursuant to Section
240.14a-11(c) or Section 240.14a-12

Name of Registrant as Specified in Its Charter:

Comfort Systems USA

Name of Person(s) Filing Proxy Statement:

Sheet Metal Workers' International Association

Payment of Filing Fee (check the appropriate box)

\$125 per Exchange Act Rules 0-11(c)(1)(ii),
14a-6(i)(1), or 14a-6(j)(2).

\$500 per each party to the controversy pursuant to
Exchange Act Rule 14a-6(i)(3).

Fee computed on table below per Exchange Act Rules
14a-6(i)(4) and 0-11.

REVISED PRELIMINARY] PROXY STATEMENT

INDEPENDENT SHAREHOLDER SOLICITATION for
Annual Shareholders Meeting
Comfort Systems USA
May 23, 2002 11am
Doubletree Hotel
2001 Post Oak Blvd.
Houston TX

For release to Shareholders 4/< 20

II. PROXY VOTING:

PLEASE USE THE ENCLOSED PROXY CARD TO VOTE FOR THE PROPOSAL. IF YOU SUPPORT IT, DO NOT SEND BACK A CARD TO MANAGEMENT (UNLESS THAT CARD GIVES YOU A BOX TO VOTE " FOR" THIS PROPOSAL). IT IS A RULE OF PROXY VOTING THAT ANY PROXY CARD IS CANCELLED OUT BY SUBMITTING A LATER-DATED PROXY CARD.

We intend to solicit at least a majority of the voting power of the outstanding stock. Our proposal is a nonbinding recommendation to the Board. You can revoke any proxy vote prior to the tally at the shareholders meeting by signing and submitting a new proxy card, by sending written notice of revocation to the proxy holder, or by appearing at the meeting and voting in person. The record date for eligibility to vote is April 9, 2002.

We seek no discretionary voting authority for the meeting: we will vote your stock as you instruct us. If you return the enclosed card but give us no instructions, we will vote your stock FOR the proposal and not vote the card in the directors election or on any other matter. The board election and management's proposal to amend the non-employee directors' stock plan are the only matters listed by management as coming up for a vote at this meeting. We incorporate by reference all information concerning the board of directors election and management's proposal to amend the directors' plan and voting procedures contained in management's proxy statement at pages 1-8.

III. INFORMATION ON PARTICIPANTS IN THIS SOLICITATION:

This solicitation is conducted by Sheet Metal Workers' International Association (SMWIA), which owns 1,400 shares of Comfort Systems USA stock. Prior to the Company's recent sale of several subsidiaries, SMWIA represented about 500 Company employees for collective bargaining purposes. Several hundred were represented by other unions. A total of approximately 2,795 were unionized, out of approximately 10,000 nonmanagement personnel. Most of the unionized subsidiaries were sold in 2002; we do not have the current number of total employees or unionized employees. To SMWIA's knowledge, there are no strikes, contract disputes, picketing, or boycotts going on currently. We do not seek your support in labor matters.

SMWIA will bear all solicitation costs (anticipated at \$5000) and will not seek reimbursement from the Company. SMWIA will solicit proxies by mail, phone, e-mail, fax and in person using its regular staff, who shall not receive any additional compensation, but SMWIA may also hire an outside solicitor. SMWIA will reimburse banks, brokers, and other custodians, nominees or fiduciaries for reasonable expenses incurred in forwarding proxy material to beneficial owners.

IV. YOUR RIGHT TO MAKE SHAREHOLDER PROPOSALS:

If a shareholder has owned more than \$2000 worth of stock for more than a year and meets the other criteria of SEC Rule 14a-8, then he or she has the legal right to have a proposal appear in management's proxy statement and proxy card. The deadline for shareholders to submit proposals for inclusion in management's proxy materials for the year 2003 is December 16, 2002.

V. EXECUTIVE COMPENSATION/SECURITY OWNERSHIP OF MANAGEMENT AND 5% OWNERS:

We incorporate by reference the information contained in

management's proxy statement at pages 8-10.

VI. TEXT OF OUR PROPOSAL:

RESOLVED that shareholders urge the Board of Directors to adopt a policy that the Company shall not, without prior approval of the holders of a majority of stock, reprice stock options already granted to any executive officer or director to a lower exercise price, nor terminate and regrant any such option at a lower price, nor grant new options to such persons on account of the market price dropping below the exercise price of prior options. This proposal shall not be construed as asking the Board to breach any existing contract nor to amend any option plan without shareholder approval.

PLEASE RETURN THE ENCLOSED PROXY CARD TODAY.

For more information, contact SMWIA's Research & Education Department at (800) 457-7694.

VOTE FOR THE PROPOSAL TO REQUIRE SHAREHOLDER APPROVAL BEFORE ANY STOCK OPTIONS GET REPRICED OR REISSUED DUE TO A DROP IN STOCK PRICE (ITEM #3 ON THE ENCLOSED CARD)

For more information, contact Allen Smith at SMWIA at (800) 457-7694.

PROXY CARD

solicited by SMWIA for Annual Shareholders Meeting of
Comfort Systems USA, May 23 2002

The undersigned hereby designates SMWIA Research er Allen
Smith, with full power of substitution, as the proxy of the
undersigned for the sole purpose of voting all stock of the
undersigned in the manner marked below at the Comfort Systems
annual shareholders meeting for 2002. This proxy card grants no
discretionary voting authority: if matters come before
the meeting other than the items below, the stock of the
undersigned will not be voted on such matters.

1. ELECTION OF DIRECTORS

For: []
J. Gordon Beittenmiller
Robert D. Wagner
Steven S. Harter

[the above are nominees of the current Board]

To withhold authority for individual candidates, cross out
name(s)

Withhold Authority as to all above: []

2. Approval of Board's Proposed Amendment to 1997 Non-Employee
Director Stock Option Plan

For []
Against []

[we make no recommendation on this issue]

3 . SHAREHOLDER PROPOSAL TO PROHIBIT THE BOARD FROM
REPRICING OR REPLACING STOCK OPTIONS WITHOUT FIRST GETTING
SHAREHOLDER APPROVAL

FOR THIS PROPOSAL: []

AGAINST THIS PROPOSAL: []

ABSTAIN: []

[WE RECOMMEND A VOTE FOR THIS PROPOSAL]

Dated: _____

SIGNATURE: _____

PRINT SHAREHOLDER NAME: _____

Optional information to help us keep you informed:

Telephone _____ Fax _____ E-mail address: _____

Mail to us in the enclosed envelope or fax to (202) 662-0891.