



January 11, 2021

TO: International Code Council Board of Directors

Re: Update IECC and IRC Chapter 11 via the ICC Standards Process

The Asphalt Roofing Manufacturers Association (ARMA) is a trade association representing North America's asphalt roofing manufacturing companies and their raw material suppliers. The association includes the majority of North American manufacturers of asphalt shingles and asphalt low slope roof membrane systems. ARMA appreciates the opportunity to offer comments to the International Code Council Board of Directors on the important decision about future development of the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC).

ARMA cautiously supports a transition to the standards development process for future development of the IECC and IRC Chapter 11. The standards development process is expected to provide greater opportunity for technical substantiation, evaluation, and debate on proposed changes to the IECC and the energy provisions of the IRC than is afforded by the governmental consensus process, increasing the likelihood of effective provisions being incorporated in future versions of these documents.

If a decision to transition to the standards development process is approved, ARMA encourages ICC to consider improvements to the standards development process intended to optimize participation for interested stakeholders. First, the frequency of meetings associated with the standards development process creates challenges for participants relative to the schedule of the governmental consensus process, which is communicated months in advance. Providing sufficient advance notice of meetings is very important to ensure consistent participation by interested parties.

Second, careful documentation of meetings and regular updates of online information about the process are critical to keep all parties informed of status and forward plans. Establishment of and adherence to an effective communication plan will engender confidence in the process.

ARMA recognizes the magnitude of this decision and thanks ICC for considering the input offered in this letter.

Sincerely,

A handwritten signature in black ink that reads "Aaron R. Phillips".

Aaron R. Phillips
ARMA Vice President of Technical Services