

**From:** Catlett, Jack <jcatlett@boma.org>  
**Sent:** Monday, January 11, 2021 7:20 PM  
**To:** Member Input <memberinput@iccsafe.org>  
**Subject:** IECC proposal

BOMA International has carefully looked at the proposal to move the IECC to a standard. We generally support the move with some reservations.

Our first concern is about committee make-up. At the inception of ICC, various code committees and Code Action Committees were provided with designated seats from various organizations. Most noticeably are the fire service and the home building industry.

These two groups can, and we note the word *can*, provide very distinct views that do not reflect the more centralist middle thinking of users of the code. This is not to say these organizations should not have a voice. However, eleven of the seats on FCAC are held by the fire service. One of those organizations representing the volunteer firefighting community seldom submits candidates for their seat. Yet FCAC has numerous provisions of the construction code under their purview.

When the Codes and Standards Committee recommended that additional seats be added to the committee to provide more balance to the make-up, the ICC Board of Directors rejected the candidates that were forwarded to them for inclusion on the committee.

In addition, home builders are granted dedicated seats on various code committees and Code Action committees. As many as four to be exact. Although they do represent a major group of users of the code, by far they are not the only large users.

BOMA is the only commercial real estate focused organization that is active in code development. Our over 17,000 members represent over ten billion square feet of existing commercial real estate, with many of them involved in new development activity. A dedicated seat on the fire code committee, IEBC committee, and IECC committee should have been provided from the inception of ICC. We have none. However, BOMA is not the only organization that could make the same claim. Dedicated seats lead to concerns relating to perception of undue influence and control.

Secondly, We feel that if the IECC becomes a standard, there should be either no or limited dedicated seats. In addition, the code official community should be fairly represented on the committee. A plan as to how the code official community will be included in continued discussion of the outcomes needs to be provided before making the decision. Whether this is in the form of a hybrid approach where code officials take final votes on outcomes or there is publication of the pieces of the standard to all ICC members for rounds of public comment before final votes to certify the committee's work.

Having been a part of several standard writing committees, we all know that code official participation just simply does not exist at the level of the ICC code development process. If the ICC moves the IECC to a standard, we risk losing the ability for code officials to weigh in.

We recognize that energy conservation is a complicated subject. Having discussions in two or one minute bites on the code development hearing floor is not a good way to make good code. A standard format would allow for good discussion to occur.

We appreciate the efforts of ICC and its Board of Directors to address this complicated issue and look forward to being part of the outcome.

Best regards.

John Catlett, MCP  
Senior Codes Consultant  
c

[codes@boma.org](mailto:codes@boma.org)

[catlettcodeconsulting@gmail.com](mailto:catlettcodeconsulting@gmail.com)

Cell: (757) 784-7495

Office: (202) 326-6339

