

*Kenneth E. Wagner*  
*Secretary of Energy & Environment*



*J. Kevin Stitt*  
*Governor*

*STATE OF OKLAHOMA*  
*OFFICE OF THE*  
*SECRETARY OF ENERGY & ENVIRONMENT*

**VIA EMAIL**

August 31, 2020  
Mike Pfeiffer, P.E.  
Code Council Senior Vice President of Technical Services  
International Codes Council

Re: Building Code Development Process Issues – State Voting Rights

Mr. Pfeiffer:

I am writing to express my strong support that the International Codes Council (“ICC”) continue to ensure that state and local government officials can participate in the code development process. Recent developments have seen well established practices of the ICC challenged that are concerning to the State of Oklahoma.

The first concern is that state and local government officials, including State Energy Offices, be allowed to continue to participate as voting members in the code development process. State Energy Offices have been experts on energy codes for more than forty (40) years and have a vital role to play in updating codes. Any changes to voter eligibility reduces the ability of states to participate in the code development process, reducing the value of the codes to achieve state goals. We strongly encourage the ICC to continue to allow state and local government officials to be eligible to participate as voting members in code development.

A second related concern is that the ICC continue to allow Online Governmental Consensus Voting (“OGCV”). This tool is extremely important for states during difficult economic times as the cost of sending officials to Committee Action Hearings which may run several days is often prohibitive. Maintaining OGCV is key to maintaining high levels of participation in the code development process by state officials ensuring that state concerns are heard and addressed. I strongly urge the ICC to continue to allow OGCV to continue.

Thank you for this opportunity to comment on these important issues facing states as it pertains to code development.

Sincerely,

A handwritten signature in black ink, appearing to read "KWagner".

Kenneth Wagner  
Oklahoma Secretary of Energy & Environment