



January 8, 2021

ICC Board of Directors
Michael J. Pfeiffer, P.E., SVP Technical Services

Re: IECC development process

Dear ICC Board Members and Mike,

I write to comment on the proposal to use the ICC consensus standards process for future updates to the IECC. I am writing on my own behalf, not any clients, to share my extensive experience on other ANSI consensus committees. I have been actively involved in the IECC's code development process for many years; likewise, I have also been actively involved in other standards development organizations that follow ANSI consensus standards including, in part:

- Serving as co-vice-chairman of the ASHRAE 90.1 consensus committee
- Serving as a voting member of the ASHRAE 189.1 consensus committee, which develops the technical content for the International Green Construction Code
- Serving as a voting member of the ICC-700 National Green Building Standard consensus committee
- Serving as a voting member of the National Fenestration Rating Council ANS consensus committee

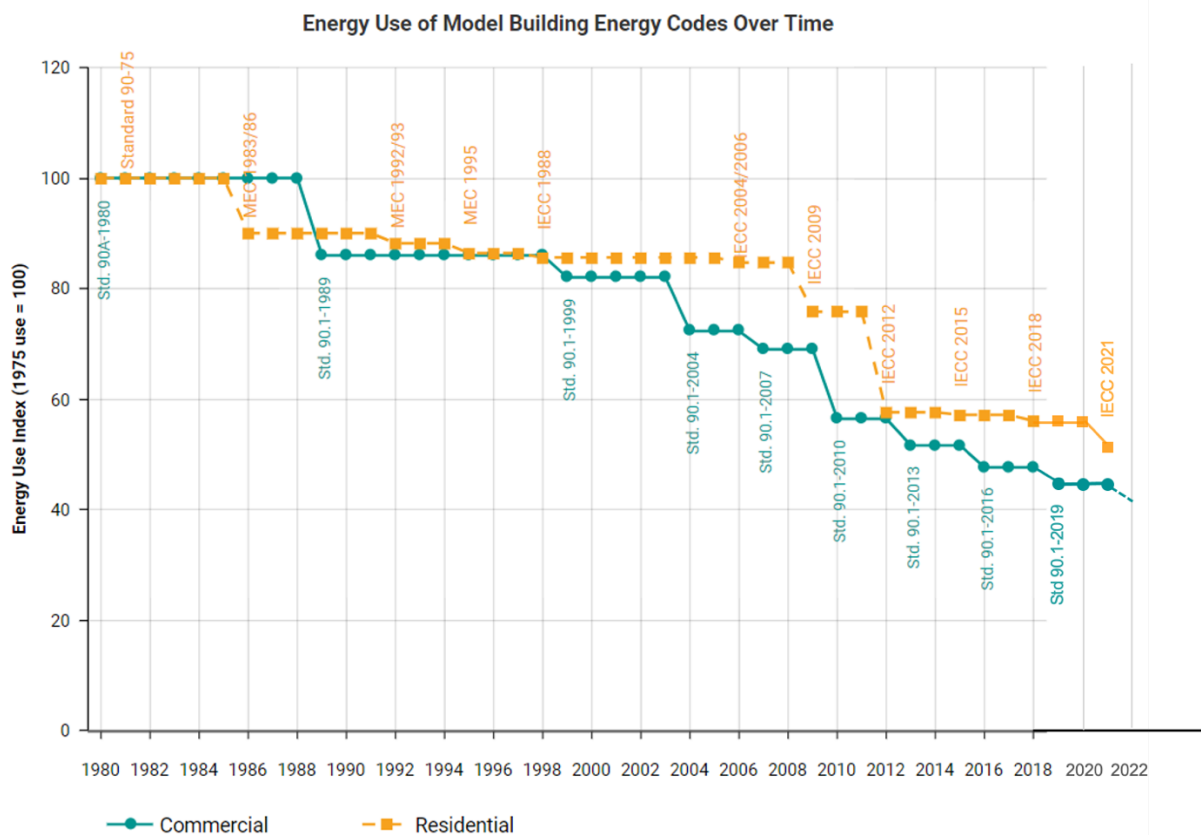
As such, I think I can provide fair observations and comparison of the *process* differences, free from any politics or vested interests. Overall, I am supportive of the proposed change. ANSI-based consensus procedures have been highly successful in producing thousands of quality, advanced documents that are technically based and have broad support across different interest groups. This of course includes several ICC standards regarding accessibility, storm shelters, residential construction in high wind speed regions, green buildings, and many more (ICC A117.1, ICC-500, ICC-600, ICC-700, etc.)

I would like to address some of the specific concerns stated on recent LTCDP committee calls. I believe many of these concerns come from those unfamiliar with consensus standard processes, and the Board and these parties can rest assured and be confident in the process once they are familiar with it.

1. A few individuals expressed concern that governmental members would be disenfranchised or excluded by switching from the ICC code development process to the ICC consensus standard process. There was also an accusation that this would give undue influence to one industry interest. They can rest assured that this is simply not true and cannot happen under ANSI-approved consensus procedures. As expressed in CP12 and the ICC Consensus Procedures approved by ANSI, the consensus committee must be balanced "without dominance or imbalance by a single interest category, individual or organization" and include government regulators and public interest representatives. No single interest

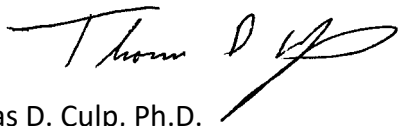
category is allowed to constitute more than 1/3 of the committee. Furthermore, the ANSI consensus process allows more involvement by all stakeholders including governmental officials, in that the document and all proposed changes go out for public review, so anyone may comment and propose further changes without having to attend hearings. The consensus committee is required by ANSI essentials to address and attempt to resolve each public comment, thus providing an even stronger, in-depth interaction than the normal code development hearing process. This is the simultaneous pro and con of consensus standards – it will take additional time and effort, but it forces much more robust technical consideration, resolution, and compromise to create broad final support ... i.e. consensus. It will be important for ICC to select leadership experienced with consensus standard processes to keep the process efficient and effective, and build confidence in the process free from politics.

- Another concern expressed was that switching the IECC to a consensus process will halt progress in the code. Again, that is not true. The easiest way to demonstrate this is to compare the progress in energy use of the IECC and ASHRAE 90.1 over time. As seen below, ASHRAE 90.1 using a consensus standard process has actually progressed further and more steadily than the IECC using the code development process, not slower. Additionally, the more abrupt stop-and-go progress in the IECC has arguably slowed adoption in some places, as compared to more consistent advances, and has added to the current controversy. That is another benefit of the more technical consideration and stakeholder engagement in consensus standard processes.



Source: ACEEE & PNNL (2019) With estimated savings for 90.1-2019 and 2021 IECC added

Thank you again for the opportunity to comment, and I look forward to helping however I can.
Best regards,

A handwritten signature in black ink, appearing to read "Thomas D. Culp". The signature is fluid and cursive, with a large, sweeping flourish at the end.

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