

January 11, 2021

Dominic Sims, CBO Chief Executive Officer International Code Council 500 New Jersey Ave Washington, DC 20001

Dear Mr. Sims:

On behalf of the over 1,600 member companies of the Greater Houston Builders Association (GHBA), we write to support for transitioning the development of the International Energy Conservation Code (IECC) from the current governmental consensus process to an American National Standards Institute (ANSI) committee-based process. The suggestion for this change originated from the ICC Board of Appeals after it heard and considered the many issues that were raised in the appeals filed on the 2019 ICC Group B results.

We believe that a change is needed because:

- A committee can develop a more consistent energy code with clear criteria for acceptance.
- Developing the energy code with a balanced committee will better represent the needs of the industry.
- Final decisions will not be based on a "get out the vote" popularity campaign.
- A committee can be more deliberative in the decision-making process.
- Builders on the committee will have the ability to participate in the final vote.

To maintain the integrity of ICC codes moving forward, it is necessary to adopt a process that includes representation of a balanced committee of stakeholders to achieve a practical energy code.

We appreciate the opportunity to provide feedback. Please let me know if you have any questions or if we can provide more information.

Sincerely,

Bradley Pepper Director of Government Affairs Greater Houston Builders Association