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January 11, 2021

Mike Pfeiffer  
Senior Vice President of Technical Services  
International Code Council  
4051 Flossmoor Road  
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Dear Mike,

I have been an active participant in the ICC code development process as a representative of the International Association of Lighting Designers (IALD) since first being appointed to the SBTC in 2009, and in the past three code cycles I have been particularly active in commenting on the lighting provisions of the IECC. As such, I have taken great interest in the ICC's proposal to use the ICC Consensus Procedures for development of future versions of the IECC.

It would certainly be advantageous to have a standing committee that is able to provide code interpretations. Energy policy requires specialized knowledge, and I have unfortunately found instances in the past where ICC staff assigned to answering energy code interpretations don't have the requisite specialized knowledge.

But this advantage seems to be outweighed by the negative effect I believe will result from changing the composition of the participants. In short, the Consensus Procedures seem to favor participation by organizations that can pay for full-time representation and to discourage participation by smaller voluntary organizations and building code officials (I assume there will be an inverse relationship between the number of building code officials participating and the frequency of meetings). This process also takes final decision-making authority away from ICC membership, and leaves open the possibility that well-funded industry and advocacy groups could effectively prevent the release of a code they don't like by utilizing the ANSI appeals process to delay final approval until after publication dates have been missed.

The end result, I fear, will be a document which prioritizes the interests of industry and advocacy groups over the interests of code users and building code officials. We already have one national energy standard like this (90.1) and we don't need another.

No process is perfect, but I have come to appreciate the openness of the ICC's code development process and its' ultimate subordination to the ICC's voting members as the final decision-making authority. I hope this will not be lost.

Sincerely,



Jack Bailey