

January 11, 2021

Board of Directors
International Code Council
500 New Jersey Avenue, NW
6th Floor, Washington, DC 20001

Dear Directors of ICC:

I am writing in opposition to the proposal to move the International Energy Conservation Code (IECC) out of the code development process into a standards development process. As a participant in the ICC code development process since the very beginning of the I-codes, my objections are focused on what I perceive will be an extremely reduced influence of the code officials, in favor of increasing the influence of industry and other special interests. The move to an ICC standards development process will mean there is no opportunity for a vote of the Governmental Member Voting Representatives (GMVRs) to determine the final outcome on proposals to change the standard, since in accordance with CP-28, updates to ICC standards are not subject to GMVR approval as is the case with non-ICC standards.

For example, while the Washington Association of Building Officials (WABO) has been able to procure WABO member representatives to serve on the accessibility standards committee (ICC A117.1), of the 47 principal and individual members on the committee, no more than five appear to be representing code officials. I have been told that there isn't a lot of code official participation in International Green Construction Code/ASHRAE 189.1 process. My personal experience with the ASCE 7 standards development process is that code official participation is minimal. It is my opinion this lack of code official participation and therefore, influence, is what awaits the IECC, should this proposal go forward.

As was mentioned several times by others in the Long-Term Code Development Process committee workgroups, the code development process for the IECC is not broken. Other equally complex and sometimes divisive proposals are discussed and voted on in the development process for the family of I-codes. While there are tweaks that can, should, and are being made to CP-28, this drastic move is not necessary and will not serve ICC's governmental members well. Please do not adopt this proposal.

Thank you for your consideration.

Sincerely,



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