



National Electrical Manufacturers Association

Representing Electrical and Medical
Imaging Equipment Manufacturers
www.nema.org

March 19, 2020

Greg Wheeler	Dominic Sims	Mike Pfeiffer
President	Chief Executive Officer	Senior Vice President
International Code Council	International Code Council	International Code Council

Re: Support for ICC Online Government Consensus Voting Process

Dear Mr. Wheeler, Mr. Sims, and Mr. Pfeiffer:

On behalf of the more than 325 Members of the National Electrical Manufacturers Association (NEMA), I am writing to express our support for the ICC Online Government Consensus Voting (OGCV) process and the voting results for the 2021 International Energy Conservation Code (IECC).

It has been brought to our attention that requests to invalidate the Online Government Consensus Voting results were received by your organization following the closing of the ballot for the 2021 International Energy Conservation Code.

Over several revision cycles, NEMA has contributed its technical expertise to aid in the development of several ICC codes, especially the International Energy Conservation Code. We have noticed the efforts of some organizations to oppose proposals intended to increase the energy efficiency of buildings, the very scope of the IECC. Efforts in that direction were particularly pronounced during the 2018 revision cycle, especially for residential buildings.

While your organization is proceeding with its internal audit, we would like you to know that NEMA believes:

- ICC should uphold their Online Government Consensus Voting process and final outcome, a potential boost of the residential and commercial building efficiency by at least 12%. This process has been vetted over multiple code cycles.
- ICC has a clear, open, and accepted process to develop building codes for public safety and health, as well as the efficiency and cost effectiveness of building construction and operation. It fairly uses a voting body consensus that is responsible for the revised code's outcome, compliance, and enforcement.
- Individuals and organizations who participated in the 2021 code cycle development cycle did so under the published ICC policies and procedures. Many, including NEMA staff and Members, have spent hundreds of hours proposing and supporting code improvements to improve safety, efficiency, cost effectiveness and enforcement of a better code. Detractors of the results should not be allowed to circumvent a process that all others were required to diligently uphold and follows. ICC is compelled to uphold the OGCV final decision out of

fairness. The ICC should not allow its mission of providing a code development process that is open, fair, consensus based, and which leads to safer and better buildings to be discounted and discredited.

Should you have additional questions about our position, please contact Patrick Hughes, Vice President of Operations and Strategy at patrick.hughes@nema.org.

Sincerely,

A handwritten signature in cursive script that reads "Kevin J. Cosgriff". The signature is written in black ink and is positioned above the printed name.

Kevin J. Cosgriff
President and CEO