



January 6, 2021

Board of Directors
International Code Council
memberinput@iccsafe.org

RE: Updating IECC to ICC standards process

Dear Board of Directors:

Thank you for the opportunity to submit comments regarding updating the International Energy Conservation Code (IECC) and Ch. 11 of the International Residential Code (IRC) using the ICC standards process.

Due to its political nature, development of the IECC/IRC Ch.11 poses unique challenges that the other ICC codes do not. The current development process with respect to the energy code has devolved into is a highly adversarial and polarizing one leaving virtually no opportunity for collaboration or compromise. The result is a "winner-take-all" outcome. This is not consistent with ICC values or of the true meaning of consensus. Moreover, the lack of compromise and consensus building has led to the ultimate disapproval of several proposals for the 2021 edition.

The current process allows for proposals to be developed in a silo without input from other stakeholders. One clear example of this was on the electrification proposals RE147-19 and CE217-19. Ultimately, both of these proposals were disapproved and progress on these issues has not been made. Electrification is a key first step to advancing efficiency, but it is an enormously complex issue that requires seamless coordination between builders, manufacturers, utilities and government. Unfortunately, under the current process that is impossible.

For these reasons, LBA strongly supports the recommendations made by the ICC Board of Directors, Appeals Board, and Long-Term Code Development Process Committee to move the IECC/IRC Chapter 11 from its current Government Consensus Process to an ICC/ANSI standard development process.

ICC can, and should be, on the leading edge of advancing efficiency. Addressing climate change is a global priority and getting new homes to net-zero efficiency

has broad support. Therefore, it is imperative that ICC maintain its commitment to publishing codes and standards that are reached through balanced consensus, otherwise true progress will not be made.

ICC is in an optimal position to make this transition. It has a very well-established ANSI development process in which numerous successful and highly credible standards have been produced, which are used widely across the US and globally.

Perhaps most importantly, moving to a standards development process will ensure competing and conflicting stakeholders find middle ground and a path toward sustainable progress that is conceived in compromise and consensus.

Thank you for considering our comments. We look forward to participating and continuing the conversation during the board meeting on January 21st.

Sincerely,



Ken Gear
CEO, Leading Builders of America