

January 11, 2021

[via electronic mail to: memberinput@iccsafe.org]

Dominic Sims, CEO
International Code Council
500 New Jersey Avenue, NW
Washington, DC 20001

Dear Mr. Sims:

On behalf of Texas Association of Builders, please accept this letter as evidence of our strong 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 Texas Association of Builders (TAB) is a non-profit trade association that was founded in 1946 to promote a positive business environment for the housing industry by addressing the housing issues of the people of Texas. TAB's membership base of nearly 11,000 members across Texas is primarily made up of home builders, remodelers, developers, and other companies and individuals who have an interest and a stake in a healthy and vibrant homebuilding industry in the State of Texas. TAB is affiliated with the National Association of Home Builders and 26 local Home Builder Associations that are located throughout the State of Texas. Representing over 723,000 jobs and more than \$67.5 billion annually of the Texas economy, TAB and its affiliated local associations play a crucial role in providing housing for Texans.

The transition to an ANSI committee-based process would be beneficial for many reasons, including the following:

- A balanced committee will better represent the needs of the industry and the public.
- It will ensure that constituencies cannot flood the voting process with “get out the vote” campaigns, which has overshadowed the code making process on occasions.
- Energy Code development will be more consistent with a clear criteria for acceptance (e.g. consistent payback between wall, window, ceiling insulation requirements).
- Committees tend to be more deliberative in the decision-making process.
- Building professionals that understand real world applications could serve on the committee and participate in the final vote.

- A balanced committee of experts would resolve the concerns surrounding governmental member voter eligibility criteria.

As the ICC proceeds with the development of the 2024 code cycle, it is crucial that the process be impartial, balanced and include a diverse committee of stakeholders. For that reason and the reasons stipulated above, TAB strongly supports the shift and believes that it will significantly enhance the process, practicality and usability of the energy code. Thank you and please do not hesitate to contact me if you have any questions or comments.

Sincerely,

Ned Muñoz
V.P. of Regulatory Affairs and General Counsel

Cc: Greg Wheeler, CBO, President of the International Code Council