



People Helping People Build a Safer World™

Headquarters

5203 Leesburg Pike, Suite 600 ■ Falls Church, VA 22041-3405 U.S.A.

Tel: +1 (703) 931-4533 ■ Fax: +1 (703) 379-1546

Toll Free: +1-888-ICC-SAFE (422-7233)

www.iccsafe.org

April 29, 2005

To: Department of Commerce, International Trade Administration

Subject: Comments of the International Code Council on the Prosperity Agenda of the Security and Prosperity Partnership of North America

The International Code Council (ICC) is pleased to offer the following comments on the Security and Prosperity Partnership of North America Prosperity Agenda. Of interest, the ICC has worked closely with the U.S. Department of Commerce International Trade Administration (ITA) and other Executive Branch agencies in support of programs that will facilitate trade and economic growth for the U.S. while protecting the health and safety of our citizens. The ICC will continue to make itself available to assist ITA and other agencies in their efforts to implement the prosperity agenda.

The ICC is a 35,000 plus member association dedicated to building safety whose mission is to provide the highest quality codes, standards, products, and services for all concerned with the safety and performance of the built environment. The ICC vision is focused on protecting the health, safety, and welfare of people by creating better buildings and safer communities. The model codes developed under the auspices of the ICC support the ICC vision and mission and serve as a baseline for the design, construction, operation and maintenance of the majority of both public and private sector buildings in the U.S. The products and services that support the application and use of the ICC International Codes facilitate the realization of safe buildings, new technology acceptance, energy conservation and other objectives. Due to these efforts the ICC International Codes are readily recognized and understood by building owners, product manufacturers, designers, contractors, code officials and all others involved in building design, construction, approval, and operation in the U.S. The ICC believes the following input, which applies to the productivity portion of the agenda, will enhance the prosperity agenda to promote growth, competitiveness and quality of life associated with buildings.

Regulatory cooperation is very important. The degree to which the U.S., Mexico and Canada can harmonize their building regulatory requirements and associated administrative and conformity assessment practices will impact economic conditions at the same time addressing safety and security. The ICC supports and will be pleased to participate in any and all efforts to harmonize building regulations, standards, conformity assessment practices throughout North America. Examples of past efforts include work with the Canadian Construction

PRESIDENT

FRANK P. HODGE, JR., C.B.O., M.C.P.

Director of Building and Fire Codes

Hilton Head Island, South Carolina

VICE PRESIDENT

HENRY L. GREEN

Executive Director

Bureau of Construction Codes & Fire Safety
Michigan Dept. of Labor & Economic Growth
Lansing, Michigan

SECRETARY/TREASURER

WALLY BAILEY, C.B.O.

Director, Development and Construction

Ft. Smith, Arkansas

IMMEDIATE PAST PRESIDENT

ANNE R. vonWELLER, C.B.O.

Chief Building Official

Murray, Utah

EDWIN M. BERKEL, C.F.I.

Fire Marshal

Mehlville Fire Protection District
St. Louis, Missouri

JAMES L. BROTHERS

Building Director

Decatur, Alabama

TERRENCE L. COBB, C.B.O.

Director, Dept. of Codes Administration
Nashville/Davidson County, Tennessee

JOHN DARNALL, C.B.O.

Assistant Director of Development Services

Tumwater, Washington

WILLIAM L. DUCK, JR., C.B.O.

Director, Dept. of Inspections and Code

Columbus, Georgia

WILLIAM D. DUPLER

Building Official

Chesterfield, Virginia

GERALD D. GEORGE, C.B.O.

Chief Building Official

Boulder County, Colorado

GREG JOHNSON

Building Inspector

Saint Paul, Minnesota

JOHN T. LaTORRA

Building & Inspection Manager

Redwood City, California

RONALD L. LYNN

Building Official

Clark County, Nevada

JAMES T. RYAN, C.B.O.

Codes Administrator

Overland Park, Kansas

KEVIN H. SCOTT

Fire Marshal

Kern County Fire Department
Bakersfield, California

STEVEN I. SHAPIRO, C.B.O.

Director of Codes Compliance

Hampton, Virginia

ADOLF A. ZUBIA

Fire Chief

Las Cruces, New Mexico

CHIEF EXECUTIVE OFFICER

JAMES L. WITT

Birmingham, AL ■ Chicago, IL ■ Los Angeles, CA

Materials Centre (CCMC) on the development and implementation of a joint U.S.-Canadian program to evaluate new building technologies for compliance with building codes and standards. A new initiative between ICC and the Comision Nacional de Fomento a la Vivienda (CONAFOVI) in Mexico is focused on development and implementation of a housing code in Mexico. We believe harmonization of building construction related codes, standards, regulations and conformity assessment practices will enhance economic conditions and enhance public health and safety. In addition such harmonization across North America enhances our ability to compete in the global market where code, standards, regulations and conformity assessment practices by other countries and regions can adversely affect U.S. and North American interests.

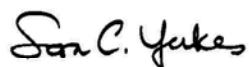
To foster such North American compatibility, the ICC would recommend that ITA establish as part of the prosperity agenda a task force of building regulatory interests from North America. This task force should identify differences in building regulatory practices and requirements, establish some common goals related building regulations, and then work in collaboration toward reciprocity and/or consolidation of building regulatory programs. Such an effort regulatory collaboration would enhance with no adverse impact on public health and safety. The ICC would be pleased to serve on such a task force and, through our work in Canada, Mexico and the U.S., could help ITA identify task force members and secure their participation.

We believe that successful regulatory collaboration will facilitate business in a number of the areas noted in the prosperity agenda. Greater cooperation in the building industry sector can be realized through more uniformity in building regulatory criteria and conformity assessment practices. We would suggest that this sector be added to the auto and steel sectors noted in the prosperity agenda.

The energy issue also noted in the prosperity agenda would also be addressed in part through the above mentioned building regulatory collaboration. North American codes and standards for energy conservation in buildings could be harmonized and enhanced through collaboration on building research. The products and services that support adoption and implementation could also benefit by a collaboration of all interested parties across all of North America. The concept of a North American building energy code could become a reality. In addition, the regulatory collaboration noted above would also address the energy issue in that it would facilitate more timely and widespread acceptance of new energy-related technologies that many times are precluded from the market due to outdated regulations or less supportive conformity assessment practices. Work that the ICC has done on hydrogen technology acceptance is an example and could easily be expanded to address Canadian and Mexican acceptance of such technology.

The ICC appreciates the opportunity to provide input to ITA on the prosperity agenda. When we can be of assistance or can provide additional information do not hesitate to contact David Conover or Mark Dinneen of my office.

Sincerely,



Sara C. Yerkes
Senior Vice President of Government Relations