



AIA Indiana

January 7, 2021

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

To the International Code Council Board of Directors:

I am writing on behalf of AIA Indiana and its 789 members to express our opposition to the ICC Board's recent proposal to replace our national model energy code with a new ICC energy standard. We strongly urge the ICC Board to reject this proposal to protect the integrity of the ICC code development process and to ensure the full participation of the ICC's Governmental Members in the development of our national model energy code.

Robert Ivy, FAIA, the EVP and Chief Executive Officer of the American Institute of Architects, has written to ICC leadership expressing AIA's opposition and disappointment that ICC would even consider this change. AIA Indiana strongly opposes this proposal for several reasons:

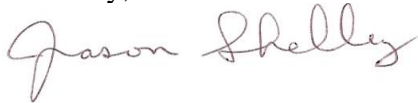
- **Limited participation/Transparency:** According to ICC's Council Policies that set the rules for the development of codes and standards, the Governmental Consensus Process leaves the final determination of code provisions in the hands of public officials who, with no vested financial interest, can legitimately represent the public interest. The ICC's Standards Consensus Procedures, however, leave final determination of a standard in the hands of a committee of 30 to 40 people.
- **Inconsistency:** In the ICC Pulse, the ICC states that the Standard Consensus Procedures "allow for more timely consideration and an in-depth investigation of energy improvements without the time limits imposed in the code hearings." Should the Governmental Consensus Process no longer be appropriate for the development of the IECC, the ICC should make clear why that consensus process remains appropriate for the development of the International Building Code (IBC), the International Residential Code (IRC), and the other 11 codebooks that are part of the I-Codes.

AIA Indiana, Jason Shelley, Executive Director
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- Limited input and deliberation: State and local governments have successfully participated in the ICC Governmental Consensus Process for over two decades, yet the ICC Board has not solicited their feedback on this proposal. The Board should not fast-track its consideration of such a drastic change that would end the guaranteed participation of its Governmental Members in developing the national model energy code without asking for either their input or approval.

AIA Indiana urges the ICC Board to reject this proposal and focus its attention on continuing to increase (not decrease) industry stakeholder and public participation in the code development process. Thank you for the opportunity to provide our input.

Sincerely,

A handwritten signature in cursive script that reads "Jason Shelley".

Jason Shelley, Hon. AIA
Executive Director