

December 15, 2020

Dominic Sims, CBO  
Chief Executive Officer  
International Code Council  
500 New Jersey Ave  
Washington, DC 20001

Greg Wheeler, CBO  
President  
International Code Council  
9500 Civic Center Drive  
Thornton, CO 80229

Dear Messrs. Sims and Wheeler,

On behalf of the undersigned organizations, we write to express 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 suggestion for this change originated from the ICC Board of Appeals after it heard and considered the many issues that were raised in the appeals filed on the 2019 ICC Group B results.

In addition, the ICC Board Committee on Long Term Code Development Process also determined that ICC should consider changing the development of the IECC committee-based standards process.

There are several reasons this change is needed:

- It will improve the timing and ICC code development process for all of the codes by streamlining the process, while maintaining their rigor and validity.
- The energy code is getting more complex, with each iteration of the IECC requiring more discussion and modifications of the proposed changes. An ANSI committee approach will allow for more deliberative discussions, resulting in a more balanced and cost-effective code.
- The Group B process showed that the online vote allows for political manipulation of the outcome. Changing to an ANSI process will eliminate this possibility and better ensure the results are representative of the broader ICC membership.
- The committee responsible for developing the code via the ANSI process can be more responsive to conceptual changes to the codes as well as resolve potential conflicts between related changes.

It is critical that as ICC proceeds with the development of the 2024 I-Codes, the process be fair and include representation of a balanced committee of stakeholders. Therefore, we strongly support the change and believe that it will greatly improve not only the process, but also the practicality and usability of the energy code.

Sincerely,

American Gas Association  
American Wood Council  
APA- The Engineered Wood Association  
Leading Builders of America  
National Association of Home Builders