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To: Mike Pfeiffer, SVP Technical Services, International Code Council

Subject: Updating the IECC and Ch. 11 of the IRC using the ICC Standards Process

Date: January 11, 2021

Good afternoon,

Thank you for soliciting input from interested parties in the industry when considering the option of maintaining the IECC and Chapter 11 of the IRC using the ICC Standards Process. ASME is a supporter of consensus standards and the ANSI Mission to enhance both the global competitiveness of U.S. business and the U.S. quality of life by promoting and facilitating voluntary consensus standards and conformity assessment systems, and safeguarding their integrity.

ASME does not support the potential decision to maintain/update the IECC and Chapter 11 of the IRC using ICCs ANSI Accredited Standards Development process. A primary driver to safeguard the integrity of ANSI Standards is to ensure proper coordination and harmonization with existing ANSs as outlined in Section 1.4 and 2.4 of the ANSI Essential Requirements. At the current time, there are existing ANSI Standards, ANSI/ASHRAE/IES Standard 90.1 and ANSI/ASHRAE/IES Standard 90.2 that have overlapping scopes and duplicative requirements. ICC is aware of this duplication as many of the requirements from 90.1 have been proposed to and accepted into the IECC over the past 15 years.

If ICC were to continue down this path, they would potentially be creating duplicative/conflicting ANSI Standards which does not support the ANSI mission to safeguard the integrity of harmonized ANSI Standards.

Thank you for your attention, and for the opportunity to provide input.

Steve Ferguson,

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