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January 11, 2020

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

Dear Members of the Board of Directors,

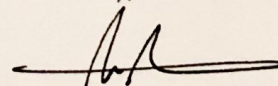
I am writing to express opposition to update the International Energy Conservation Code (IECC) with the ICC Consensus Procedures. I have concerns about this proposal and urge the Board of Directors to reject it.

The ICC Consensus Procedures strip public officials of the ability to make final determinations of Code and suppresses the voice and participation of public officials. This is a direct reversal of Council Policy 28 (CP 28) objective to grant final determination of Code text to public officials. Furthermore, the proposed Consensus Procedures limits government regulator representation on the committee - only 1/3 of the committee may represent regulators. Whereas the governmental consensus process requires regulators to compose a minimum of 1/3 of a committee. The suppression of the voice of regulators will not aid in the development of the IECC.

In short, interest groups such as manufacturers, builders, and testing laboratories are vital to the process, but they cannot be expected to vote in opposition to their special interests. By contrast, public officials are tasked with enforcement of laws and regulations that are adopted by officials elected to represent the interest of residents. The final vote should be retained with public officials.

Lastly, there is opportunity for improvement of Council Policy 28, and I encourage continued deliberation by the Board Committee on the Long-Term Code Development Process (LTCDP). I am confident LTCDP and Board of Directors can improve the process without making this monumental change and reversing the essence of what it means to be an ICC developed code.

Sincerely,



Ali Alaswadi
Consumer