



National Electrical Manufacturers Association

The association of electrical equipment
and medical imaging manufacturers
www.nema.org

August 18, 2020

Michael J. Pfeiffer, P.E.
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RE: NEMA Supports the Certified Results of the Group B Code Development Process – 9/3/2020 Hearing

As the leading trade association representing the manufacturers of electrical and medical imaging equipment, the National Electrical Manufacturers Association (NEMA) is writing to express our support for the certified results as published in the 2019 Group B Cycle Report on the Code Development Process and asks the Appeal Board to reject the appeals under consideration at the hearing on September 3, 2020 related to proposals RE147 and CE217, Part I and Part II.

As an interested party, NEMA respectfully request to have access and be involved in this hearing.

NEMA fully supports the certified results of the International Code Council (ICC) Group B code development process. We further believe the code changes made by RE147 and CE217, Part I and Part II are within the scope and intent of the International Energy Conservation Code (IECC) as they both improve the effective use and conservation of energy over the useful life of a building as clearly stated as the intent of the code in C101.3 and R101.3 of the IECC. The arguments made in the appeals documents were already provided in public comment and during speaker testimony at both Group B hearings. As such, both the technical merits of the proposals along with their applicability and appropriateness within the code have already been thoroughly vetted by all voting parties.

To invalidate the affirmative votes of the committee members, public comment hearings, online governmental consensus vote, validation committee and subsequent audit results would be inappropriate and would serve to undermine the integrity of the ICC and I-Code development process. Therefore, NEMA strongly urges the Appeals Board to reject these appeals and reaffirm the duly certified results as published in the 2019 Group B Cycle Report on the Code Development Process.

NEMA sincerely appreciates your time and consideration of our public comment. Should you have any questions about our position on this appeal hearing, please contact Patrick Hughes, Vice President of Operations and Strategy at patrick.hughes@nema.org.

Sincerely,

A handwritten signature in black ink that reads 'Kevin J. Cosgriff'. The signature is written in a cursive, flowing style.

Kevin J. Cosgriff
President and CEO

