



January 11, 2021

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

Dear Board Members:

Thank you for this opportunity for the Window & Door Manufacturers Association (WDMA) to provide feedback on the International Code Council's (ICC) consideration of updating the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC) using the ICC standards process. We respectfully offer the following comments.

Overall, we recognize the concerns that have been raised with updating the IECC and Chapter 11 of the IRC under ICC's governmental process and the merits of allowing for more timely consideration and in-depth investigation of energy improvements that would be afforded under ICC's standards process, without the time limits imposed in code hearings.

In our consideration of the concept as presented by ICC, we appreciate the information ICC has provided in the framework summary and the discussion that has been had thus far by the ICC Board Committee on the Long-Term Code Development Process (Blue Ribbon Committee). However, we believe that there is still insufficient detail for the ICC Board to make a fully informed final decision on the matter at this time. For instance, a key tenet of ICC's Consensus Procedures as stated in Section 3, ICC Consensus Committees, is that "Each such committee may develop additional procedures, with approval of the ICC Board of Directors, as needed to perform its assigned mission." It is difficult to envision that a consensus committee established with a mission to update the IECC and Chapter 11 of the IRC under ICC's Consensus Procedures will be able to do so effectively without developing additional, more specific procedures. We believe those procedures should at the very least be outlined first and they have yet to be.

Given the gravity of a decision to update the IECC and Chapter 11 of the IRC under ICC's standards process, we are concerned that a decision to do so without mapping out the process in greater detail in accordance with ICC's Consensus Procedures, and without due consideration of that detail by ICC members, stakeholders and the ICC Board would be premature.

More specifically, and among the questions that we believe should be answered before a final decision is made on the matter are:

- What will the size or approximate size of the consensus committee be as currently envisioned?
- With nine interest categories, how will balanced representation be achieved?
- Will there be any revision to the interest categories as allowed by Section 5.3, of the Consensus Procedures (Interest Categories)?

- Presuming there will be the need to establish subgroups in accordance with Section 6, of the Standards Procedures (Subgroups Created by the Committee), what subgroups are currently envisioned and what will their procedures be?
- What will the tenure for committee and sub-group members, chairs and vice chairs be?
- Will tenures be staggered?
- What is currently envisioned with respect to the number, frequency and scheduling of committee and subgroup meetings, and the timeline and milestones in general?
- How will continuous maintenance be administered?

Again, we believe that these and other fundamental questions raised by ICC members and stakeholders should be answered and circulated accordingly for review and comment by them before a final decision to move forward with updating the IECC and Chapter 11 of the IRC using the ICC standards process is made. This would provide for more thorough consideration and feedback by ICC members and stakeholders on the matter for the ICC Board's subsequent consideration. This would also provide for a smoother transition if such a move is ultimately approved and allow ICC members and stakeholders that will be engaged in the process to become somewhat versed in it well before the process is initiated. We believe this would also better ensure the success of the move for the sake of the IECC if that is the course to be followed.

Thank you again for this opportunity to provide WDMA's feedback on this matter.

Sincerely,



Jeffrey T. Inks
Vice President – Advocacy