



National Institute of BUILDING SCIENCES

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October 5, 2011

Board of Directors
International Code Council
500 New Jersey Avenue, N.W., 6th Floor
Washington, DC 20001-2070

RE: IMPACT OF ALTERED CODE DEVELOPMENT SCHEDULE ON THE RELATION OF STANDARDS TO TECHNICAL PROVISIONS

Dear President Brothers and Members of the Board:

As you may know, the National Institute of Building Sciences (Institute) was established by the U.S. Congress to serve as an authoritative source of technical information for the built environment. The Institute accomplishes this mission through engagement with public and private sector stakeholders, including ICC. The Institute's Board of Directors was recently made aware of an issue with the new code development schedule and the relation to relevant standards adopted by reference in the codes. On behalf of the Board, we offer the following observations and recommendations for resolution of this issue.

The new dual track schedule for the development of the "I" Codes placed the "Administrative" provisions on track B. It is our understanding that within these administrative provisions, determinations on the reference standards to be included in the upcoming version of the code are adopted. However, the content of many code changes proposed in group A rely on adoption or rejection of the latest versions of standards. This offset in adoption of standards to occur after code changes related to them severely hinders the ability of those developing code change proposals to know in advance of their submissions on what standard such a proposal should be based.

To resolve this issue, we recommend that the ICC board consider the following potential solution. The determination of whether a standard meets the procedural requirements of ICC should be determined as early in the revision cycle as possible. Such determinations can be made by the Codes and Standards Council, the Administrative Committee or the Referenced Standards Committee. The technical merit of a standard for potential inclusion in the code should then be determined by the technical committee for the relevant code. This would allow participants in the code development process to formulate their proposals with a clearer understanding of the status of the relevant reference standards.

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Thank you for your consideration of this important issue. If you have any questions or wish to discuss this issue further, please contact us.

Respectfully,



Henry L. Green, Hon. AIA
President



Jim. W. Sealy, FAIA
Chairman

cc: SDO's;
American Concrete Institute
American Iron and Steel Institute
American Institute of Steel Construction
American Society of Civil Engineers
ASTM International
Gypsum Association
Portland Cement Association
The Masonry Society