

February 5, 2024

David Spencer, CBO, ACO
2024 IECC Appeals Board Chair
ICC Board of Directors

Spencer:

We include a summary of relevant Viewpoint on the 2024 IECC appeals Economy This Viewpoint (ICC) ub-

Board should take to -03 by ICC itself -03) We have

with

³ The

² of-directors-fall-2023-

-safety-

-from-the-

-code-council-board-

Code®

the four as decided to consider appeals within

standards process a transparent or consistent steward of a

choice for the Appeals Board: provisions that appellants have ⁵ However, the *general* process issues is the , rather, a binary

r made broad errors in process and If the Appeals Board

Appeals Board may consider Commercial – the 2024 Resid

process and procedure, the Appeals Board must defer of the rendered t vote

2 the process and procedures of the IECC development a reasoned of by 30 days are approval IECC - and approval of the full 2024 IECC- as the Consensus *in their totality* The Appeals Board thus cannot line-item veto of the 2024 IECC

A further broad proc E0 (1)-4 upr30 (1)isC)2 sCelisCithtmansotheapealsCbeithe pr30 (1)-2 (1)T)- (1)-4 upr230 (1)0 (1)

the
, for the reasons
and
December 3, 2023, deadline: we urge the Appeals Board to reject all appeals and let the ICC's
Consensus Committees' judgement stand

3.

aside this fact for now: -03 does not allow for appeals based on scope and intent
without a process or procedure issue has chosen to

7
any appeal considered from this viewpoint, the relevant appeals
- those by - scope or
-item veto to the

four relevant appeals are similar in their authors make a mistake common by

allowance @39000-360501E0-25] Acort E4 03 0023 (E0-0005 f0004 Tc023 (E0-000a20 Tf0001Tc -C
~~01 B 00000002 - 01000000 11000000 - 01000000 - 01000000~~) () () () ()

Further
because

The Appeals Board must reject the APGA appeal.

December 3, 2023, deadline: **the Appeals Board must take no action on these matters, or they will be in violation of ICC policy.**

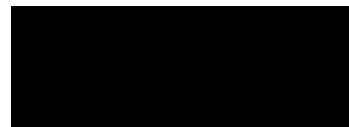
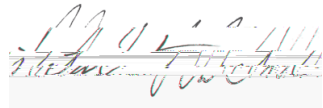
The ICC violated at least four of its own policies -03 when it ed the appeals by

Board thus has no purview over these appeals and must either refuse to review them or them If the Appeals Board chooses not to follow that clear

we have laid out in detail in this Viewpoint the bases for and procedure, absence of viable claims of v

of lack of evidence for

be reviewed by the Appeals Board, the even if the appeals were valid to appeals



Jennifer Amann
Senior Fellow