

To:

Cc:

Subject:

Attachments:

Benjamin-

covered by the guidelines. This would appear to be a significant oversight by those responsible for drafting the Guidelines.

We appreciate your willingness to accept our comments, and hope that the team ultimately responsible for the drafting of the Guidelines will take the time to compare the Guidelines to all relevant IRC and IECC sections, and insure that the documents are consistent and all conflicts are resolved.

This is especially true since the Building Technology Program of the Energy Efficiency and Renewable Energy Office of the Department of Energy expends significant resources and man-hours to encourage and assist states to comply with the energy efficiency provisions of the 2009 IECC, pursuant to EISA, EPACK, and other Federal laws.

To have other divisions of the Department of Energy promulgate documents that advocate practices either inconsistent with the 2009 IECC, in conflict with the 2009 IECC, or less stringent than the 2009 IECC would appear to be a counterproductive and wasteful expenditure of federal funds.

Because we work closely with the people in BTP of EERE, I have copied several of our contacts there to make them aware of the discrepancies between the Guidelines and the IRC and IECC requirements that may be of concern to them.

Thanks for your outreach to us, and your willingness to accept our comments. To minimize confusion, and achieve the goals of safety and energy efficiency that are the primary goals of the IRC and IECC, we look forward to working with you to insure that any guidelines issued are consistent with the codes used by the states and local governments that adopt and enforce our codes.

Warm Regards,