The International Code Council is the legal successor to the Council of American Building Officials (CABO), that published the first *Model Energy Code* in 1992, which is referenced in the Energy Policy Act (Public Law 102 486). The *Model Energy Code* was renamed the *International Energy Conservation Code* when it was republished by ICC in 2000, and has been re published every three years since that time, with the current edition being the 2012 edition.

The International Code Council (ICC) appreciates the work that FHA has done in revising the manual underwriting requirements to balance concerns about credit quality with the flexibility to allow emerging risk factors to be included in the calculations that determine what income level is necessary to assure that borrows can successfully repay a federally insured mortgage. One of those risk factors, which is reflected in Section IV of the

Therefore, it is

outcome of code change proposals. This system of code development has provided the citizens of the U.S. the highest level of building safety in the world for more than 80 years. The ICC governmental consensus process meets the principles defined by the U.S. Standards Strategy of 2005 and 2010; the OMB Circular A 119, Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities (1998), as codified by Public Law 104 113, National Technology Transfer and Advancement Act of 1995.