

Antitrust Concerns Relating to ICC and RESNET

**Janet Thome : DOE Docket No. EERE-2026-BT-BC-003
President Tiny House Alliance USA**

The relationship between the International Code Council (ICC) and the Residential Energy Services Network (RESNET) raises antitrust concerns because both organizations participate in multiple interconnected functions within the building energy ecosystem.

Both ICC and RESNET are ANSI-accredited standards developers. They jointly develop ANSI/RESNET/ICC standards while also participating in related activities involving certification, training, quality assurance, inspections, software, registry services, and compliance programs.

A major concern is the publicly disclosed leadership interlock involving Mark Johnson, who serves as Chief Operating Officer of ICC while also serving as President of RESNET. This connection warrants federal review as part of the broader ICC-RESNET relationship.

The cumulative effect of these relationships should be investigated to determine whether they create:

- Interlocking organizational relationships.
- Hub-and-spoke market structures.
- Closed-loop compliance systems.
- Vertical integration.
- Barriers to market entry.
- Reduced competition.
- Reduced consumer choice.
- Reduced innovation.
- Increased compliance costs.
- Increased construction costs.
- A blackout of competing standards and competing standards organizations.

This supporting document is provided to identify the antitrust concerns that I request DOE and DOJ examine as part of the accompanying petition.