

ICC Is A Single Firm Monopoly Operating In Plain Sight

The International Code Council Is Tied To Congress Through The National Institute Of Building Sciences (NIBS)

The Story Of NIBS

We were created by act of Congress in 1974 to be the nation's authoritative source of findings and recommendations that impact and improve the built environment for the American people. At the National Institute of Building Sciences (NIBS), we connect research, policy, and practical application to advance innovation in the built environment. Our mission is to create a safer, more resilient, and technologically advanced infrastructure that serves American communities and strengthens our nation's future.

From shaping industry standards to guiding digital transformation, we empower building professionals, policymakers, and owners to make informed decisions that enhance sustainability, efficiency, and resilience. We convene experts across sectors to develop solutions that ensure construction, infrastructure, and disaster preparedness keep pace with evolving challenges. Through initiatives such as the Digital Technology Council (DTC) and the Facility Management & Operations Council (FMOC), NIBS is at the forefront of advancing best practices. We help develop and refine standards, including NBIMS, NCS, and ANSI/ASHRAE/NIBS SPC 224, to support industry-wide adoption of data-centric approaches and emerging technologies. We are stewards of the Whole Building Design Guide and the SF Tool, and we keep these comprehensive resources, which guide public buildings and infrastructure, freely available to the public.

Building American Innovation isn't just our tagline—it's our commitment. We foster collaboration between government, industry, and academia to drive forward-thinking strategies for resilient communities. Because at NIBS, we don't just build structures, we build solutions.

[Source](#)

Board of Directors

The National Institute of Building Sciences Board of Directors is comprised of up to 21 members. The President of the United States, with the advice and consent of the Senate, appoints six members to represent the public interest. The remaining 15 members are elected from the nation's building community and include both public interest representatives and industry voices. A majority of Board members are required by the authorizing legislation to be in the public interest category.

Individuals With Ties To Both ICC And NIBS

Dominic Sims: Previous ICC CEO Is On The Board Of NIBS

John (JC) Hudgison: Senior F Board Member Of ICC and a Board Member of NIBS

[Ryan Colker](#) : Vice President, Innovation with the International Code Council, where he leads the Energy, Resilience and Innovation Center of Focus. He also serves as Executive Director of the Alliance for National & Community Resilience (ANCR), a national coalition working to provide communities with the tools necessary to holistically assess and improve their resilience. Prior to joining ICC, Colker served as Vice President with the **National Institute of Building Sciences**, where he directed the Consultative Council and served as staff director of the Council on Finance, Insurance and Real Estate; the **National Council on Building Codes and Standards**; the **Off-Site Construction Council** and **NIBS' STEM Education Program**.

ICC Is Co-Branding a Standard With The New York Institute Of Technology

In December 2025, the CfOC Consensus Committee was seated and began development of the new CfOC/ICC 1220-202x, Standard on Configurations and Connections for Off-Site Construction. Please see the [Public Documents](#) section below for membership roster, meeting notices, agendas, notes, and public drafts. Interested parties should sign up [here](#) to be added to an email distribution list to receive Standard related notices.

In April 2025, the CfOC Consensus Committee began development of the new CfOC/ICC 1220-202x, Standard on Configurations and Connections for Off-Site Construction.

CfOC/ICC 1220-202x, provides requirements for the location and specifications of module-to-module and building-to-module connections for essential building systems including structural, plumbing, electrical, mechanical, fire protection, and data. It also provides for the standardization of dimensions of modular components. This Standard includes componentized, panelized, and modularized elements. The standard is intended to serve as design criteria adopted by owners, designers, manufacturers, lenders, and governments to support efficiency and certainty in the delivery of off-site construction components and projects. The standard will leverage existing standards for interconnections where available.

In April 2025, the CfOC and the International Code Council (ICC) agreed to collaborate on the development and deployment of the CfOC/ICC 1220-202x Standard.

In February 2025, the CfOC was approved as an [Accredited Standards Developer](#) (ASD) of the American National Standards Institute (ANSI).

[Source](#)

Submitted by:

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Overview of the International Code Council



Who Is the International Code Council?

The International Code Council (ICC) is a **501(c)(6) trade association** that develops model building codes and standards used throughout the United States and internationally. The organization was formed in 1994 through the merger of three regional code organizations: BOCA, ICBO, and SBCCI.

ICC has a membership of more than **65,000 members**, including building officials, architects, legislators, government officials, and manufacturers. In addition to publishing

building codes, ICC operates an extensive network of subsidiaries known as its “**Family of Solutions**,” which provide services related to accreditation, certification, inspection, training, and testing.

In 2019 ICC acquired NTA Inc., a third-party conformity assessment organization that now operates as **ICCNTA**, providing testing, engineering, inspection, and certification services for off-site construction and building products.

ICC is also an **ANSI-accredited standards developer**, meaning some of its standards are developed under the procedures of the American National Standards Institute.

Summary

ICC functions as both a **standards developer and a service provider** within the building industry.

Vertically Integrated Systems

Through its “Family of Solutions,” ICC participates in multiple stages of the regulatory and commercial lifecycle of building construction.

IAS (International Accreditation Service): Provides the accreditation necessary for testing and inspection firms.

- **ICCNTA (formerly NTA):** Specializes in the actual testing and certification of off-site construction.

- **ICC-ES (Evaluation Service):** Issues the reports that verify products meet code requirements.

- **ICC Digital Codes:** Controls the digital platform through which these codes, commentaries, and state-specific standards are accessed and purchased.

- **S.K. Ghosh Associates & General Code:** Provide technical training and codification services to local governments.

The Silencing Effect: This structure creates a dangerous economic dependency. Because third-party agencies and inspectors rely on IAS/ICC-ES accreditation for their very survival, they are effectively neutralized. Openly objecting to ICC

standard-development decisions carries a perceived professional and economic risk that chills dissent within the industry.

6. The Mechanics of Capture: Material, Cognitive, and Cultural

Regulatory capture in this sector is achieved through three overlapping forces that transform the ICC from a publisher into a market gatekeeper:

- **Material Capture:** ICC 1215 creates economic advantages for industrial-scale incumbents. The complexity and cost of compliance under the SRU banner create expensive barriers to entry, systematically excluding independent, small-scale artisan builders.
- **Cognitive Capture:** Due to the extreme technical complexity of building codes, regulators and local officials suffer from **information asymmetry**. They internalize the worldview of the ICC “experts” simply because they lack the independent resources to challenge the industry-dictated narrative.
- **Cultural Capture:** Shared professional networks and the “revolving door” between industry associations and regulatory bodies create a shared social norm. To those within the hub, institutional consolidation is seen not as a threat, but as “progress.”

In this structure, ICC functions as a **central coordinating entity within a vertically integrated standards ecosystem**.

Summary

ICC’s organizational structure places standards development, accreditation, evaluation, and conformity assessment services within a single interconnected network.

Hub-and-Spoke Industry Structure

Within this ecosystem, ICC operates at the center of a network of relationships involving building officials, manufacturers, nonprofit organizations, trade associations, and regulatory bodies.

These relationships frequently involve:

- joint standards development
- co-branding of standards with trade associations
- joint trade shows and industry events

- co-published standards and technical materials
- training and certification programs tied to ICC standards
- promotion of ICC-affiliated compliance services

This structure resembles what antitrust scholars often describe as a **hub-and-spoke arrangement**, where a central organization coordinates activity among multiple market participants.

Summary

ICC's central role in standards development and related services creates a network of interdependent relationships across the building industry.

Closed-Loop Governance Structure

ICC's governance structure includes significant participation by building officials who simultaneously participate in multiple stages of the regulatory process.

This structure often includes:

- building officials serving on ICC committees and boards
- building officials voting on model codes and standards
- building officials adopting those codes and standards at the state or local level
- ICC providing training and certification to those same officials

In practice, this creates what critics have described as a **closed-loop system**, where rulemaking, voting, and adoption can occur within overlapping institutional networks.

Summary

The ICC governance model allows the same professional networks to participate in standards development, voting, and adoption.

Economic Influence Within Standards Development

Because ICC subsidiaries provide accreditation, evaluation, inspection, and certification services, third-party agencies participating in the standards ecosystem may depend on ICC-related services for their operations.

These relationships can create structural pressures within the industry.

Potential effects include:

- economic dependence on ICC accreditation or evaluation services
- reluctance among industry participants to openly challenge standards decisions
- reduced competition among third-party service providers
- barriers to entry for independent inspection or certification bodies

Summary

When standards development is closely connected with accreditation and certification services, economic relationships within the ecosystem can influence industry participation.

Relevance to Standards Development Concerns

The International Code Council and the Tiny Home Industry Association (THIA) are co-branding **ICC/THIA 1215 – Standard for Design, Construction and Regulation of Small Residential Units and Tiny Houses**. Prior to this both organizations fought against a new ASTM Tiny House committee being developed for a YEAR regarding tiny houses with false duplication claims.

After winning all their objections, they are now duplicating ASTM, in violation of WTO Coherence, vote stacked the committee, created a group boycott of a competitive standard, insisted on the SDOs own proprietary material for certification, they are creating a bundling of a series of standards, they ignore 99% of complaints, are currently overriding and disregarding motor vehicle and HUD preemption, and have violated most of their own policies, ANSI, antitrust laws and I have found there is no where to turn to. That is just a short summary of my complaint.

I have even sent a complaint to the FTC and it was not answered. Thank you for your consideration.

Author Statement

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I was a proponent who spearheaded the tiny-house effort within ASTM, working collaboratively to establish the E06.26 Tiny Houses Subcommittee under the Committee on Performance of Buildings at ASTM International. I currently serve as Membership Secretary for the subcommittee.

Disclaimer:

I do not represent ASTM International. The views expressed in this document are my own, based on my personal experience, public information, and independent research.