

Karl Aittaniemi
ICC Board Of Directors
CEO John Belcik
International Code Council
200 Massachusetts Ave NW
Washington, DC 20001
August 1, 2026
Revised PIN Request 1215 And 600 Square Footprint

Subject: Request for Direct Response Regarding Revised PINS Requirement for ICC/THIA 1215

Dear Mr. Aittaniemi, Mr. Belcik, and Members of the ICC Board of Directors:

Thank you for your response to my May 31, 2026 letter concerning my request for a revised Project Initiation Notification System notice for ICC/THIA 1215.

Your response stated that the committee was established in accordance with approved procedures, reflects a diverse range of skills and expertise, receives input from approximately 30 interested parties, and remains open to participation by interested individuals and organizations. You also advised that I may submit a complaint or appeal if I believe there has been a nonconformity with the consensus procedures.

Respectfully, that response did not answer the question presented in my letter.

My request was not limited to the general balance of the committee, the number of interested parties participating, or whether the process is open to public involvement. I specifically cited Section 2.5.1 of the ANSI Essential Requirements, which provides that a revised PINS shall be submitted and published when the stakeholders likely to be directly impacted by a standard change substantively as the standard is developed.

The May 16, 2025 PINS identified stakeholders primarily from the perspective of ICC/THIA 1215 as a building standard. As the draft developed, however, it expanded into matters involving permanent chassis, wheeled structures, highway transportation, transportation-related structural design, motor-vehicle equipment, inspection, certification, registration, titling, taxation, and regulatory compliance.

My May 31 letter identified numerous stakeholder groups directly affected by those subjects that were not identified in the PINS, including HUD, DOT, NHTSA, FMCSA, SAE, state transportation enforcement officials, chassis fabricators, trailer manufacturers, motor-vehicle-equipment manufacturers, motor carriers, freight companies, dealers, registration and titling authorities, and tax assessors. I also noted that the voting committee does not include representation from those transportation-related stakeholder groups.

The fact that approximately 30 interested parties have provided input does not resolve whether the stakeholder categories listed in the original PINS remained accurate after the standard expanded into these additional regulatory and transportation areas. Open participation also does not substitute for the ANSI requirement to identify the stakeholders likely to be directly affected by the project.

My letter additionally raised the possible substantive change to the size of the Small Residential Unit. If the definition or application of the SRU was changed to 600 square feet throughout the standard, that change should be reflected in the public record, committee meeting notes, and, where required, an updated announcement in ANSI Standards Action.

I am therefore respectfully requesting a direct written response to the following questions:

1. Does ICC agree that the subjects and stakeholder groups directly affected by ICC/THIA 1215 have changed substantively since publication of the May 16, 2025 PINS?
2. If ICC does not agree, please explain how permanent chassis, transportation systems, motor-vehicle equipment, registration, titling, taxation, and transportation-related regulatory compliance were adequately represented in the original PINS.
3. Does ICC believe that participation by interested parties satisfies the separate ANSI requirement to identify the stakeholder groups likely to be directly impacted?
4. Did ICC evaluate whether the expansion of the standard triggered the revised PINS requirement under ANSI Essential Requirements § 2.5.1?
5. If ICC determined that a revised PINS was not required, please provide the basis for that determination.
6. Was the SRU size definition or scope substantively changed during committee action, and if so, where was that change formally documented and publicly announced?

This request is not asking ICC to restate that the committee is balanced or that the standards process is open. It is asking ICC to address whether the development of ICC/THIA 1215 triggered the specific ANSI requirement for a revised PINS.

Referring me back to the committee or to a complaint or appeal process does not answer that underlying question. Before determining whether a procedural complaint is necessary, I am requesting a clear statement of ICC's position regarding compliance with ANSI Essential Requirements § 2.5.1.

The 600 Square Footprint Was Not Addressed

ICC's response also did not address my separate inquiry regarding the reported change of the SRU limit to 600 square feet or whether that substantive change required public notice through a revised PINS.

Improper Direction To Appeals Portal

I am also concerned that ICC continues to direct me to the appeals portal instead of addressing

my complaints informally. CP#12A-25, Section 4.14.2, requires a written response that specifically addresses each allegation of fact, and Section 4.14.3 provides for an appeal hearing only when the parties are unable to resolve the complaint informally. Repeatedly directing me to a formal appeal process, with a \$500 fee, while leaving specific questions unanswered is inconsistent with the policy's stated process for attempting informal resolution before an appeal hearing.

I respectfully request a written response addressing each of the questions above.

Respectfully submitted,

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President

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