



International Code Council
48 Dublin Drive
Niskayuna, NY 12309
tel: 888.icc.safe (422.7233)
fax: 518.783.4570
www.iccsafe.org

July 20, 2015

Good morning Chairman, Members and Staff of the Board of Examiners of Sheet Metal Workers. My name is Dottie Harris. I am the Vice President of State & Local Government Relations and the Massachusetts Liaison to the International Code Council (ICC). The ICC is a member-focused association dedicated to helping the building safety community and the construction industry provide safe and sustainable construction through the development of codes and standards used in the design, build, and compliance process. Most U.S. states and jurisdictions (including Massachusetts), Federal Agencies, and many global markets choose the International Codes to set the standards for regulating construction, fire prevention, and energy conservation in the built environment.

The International Codes (I-Codes) are updated and revised every three years through a national consensus process that strikes a balance between the latest technology, new building products, installation techniques, economics, and cost while incorporating the most recent advances in public and first responder safety. It is an open, inclusive process that encourages input from all individuals and groups. Additionally, now with cdpACCESS®, our cloud-based system for the code development process (cdp), anyone can participate by just logging in with a username and password. This allows the collaboration, review, submission and voting on code change proposals and public comments.

The I-Codes are correlated to work together without conflicts so as to eliminate confusion in building design, inconsistent code enforcement, or differing interpretation among different jurisdictions. Jurisdictions that utilize the most current edition of the I-Codes thereby ensure the highest standards for safety, energy efficiency, sustainability, economic incentive, and long-term resiliency of their built environment.

As you are aware, the Board of Building Regulations and Standards (BBRS), has begun the process to update to the 9th Edition of the State Building Code (780 CMR). This code will be based on the 2015 versions of the International Building Code (IBC), International Residential Code (IRC), International Existing Building Code (IEBC), International Energy Conservation Code (IECC), and by reference, the International Fire Code (IFC) and International Mechanical Code (IMC) along with Massachusetts amendments.

Clearly the Board and the Sheet Metal Workers it regulates are affected by the majority of the abovementioned codes. However, the code that most directly is utilized by those professionals is the IMC with MA amendments. Over the last 21 years of the IMC's existence, there has been meticulous coordination and correlation with the building code and other codes. For example, there are approximately 60 references to the International Mechanical Code (IMC) within the current Eighth Edition of the Massachusetts Building Code. Although the IMC is referenced



International Code Council
48 Dublin Drive
Niskayuna, NY 12309
tel: 888.icc.safe (422.7233)
fax: 518.783.4570
www.iccsafe.org

several times, there are hundreds of individual sections that relate to sheet metal - from metal roofing system materials, slopes and fastening to maintaining the proper fire and smoke ratings of corridors through proper damper placement and installation to the many product and system standards that are fully addressed in the building code.

It is critical to bring up the abovementioned information since the past direction of the Board has been to adopt a separate code with conflicting provisions to the State Building Code. Therefore I recommend that the Board review the codes based on 9th Edition of the State Building Code found at: <http://codes.iccsafe.org/I-Codes.html> and see what modifications might be needed. The timing is perfect for the Board to get involved with the process before the 9th Edition of the State Building Code becomes effective. Whether a separate sheet metal code or modifications to the IMC, or even the other MA adopted codes is needed, the current process allows for that.

Lastly, I wanted to be sure you are aware that technical assistance, product evaluation reports, training, certification, and other support materials are available to you. The International Code Council is honored to partner with the Board to serve your needs. Thank you for the opportunity to speak to you today and I am pleased to answer any questions or provide you with any additional documentation.