



ICC CODES - PUBLIC COMMENT FORM

FOR PUBLIC COMMENTS ON THE "2008 REPORT OF THE PUBLIC HEARINGS"

PLEASE SEE BACK OF FORM FOR PROCEDURES ON SUBMITTING PUBLIC COMMENTS. ALL SUBMITTALS MUST COMPLY WITH THESE PROCEDURES.

CLOSING DATE: All Comments Must Be Received by June 9, 2008. The 2008 Final Action Hearings will be held September 17-23, 2008 in Minneapolis, Minnesota

1) Please type or print clearly: Public comments will be returned if they contain unreadable information.

Name:	Ronald Majette				Date:	June 9, 2008	
Jurisdiction/Company:	U.S. Department of Energy						
Submitted on Behalf of:	U.S. Department of Energy						
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2) Copyright Release: In accordance with Council Policy #28 Code Development, all Code Change Proposals, Floor Modifications and Public Comments are required to include a copyright release. A copy of the copyright release form is included at the end of this form. Please follow the directions on the form. This form as well as an alternative release form can also be downloaded from the ICC website at www.iccsafe.org. If you have previously executed the copyright release, please check the box below:

2007/2008 Cycle copyright release on file

3) Code Change Proposal Number:

Indicate the Code Change Proposal Number that is being addressed by this Public Comment: EC42 Part II

4) Public Comment: The Final Action requested on this Code Change Proposal is: (Check Box)

Approved as Submitted (AS):
 Approved as Modified by this Public Comment (AMPC):
 Approved as Modified by the Code Committee as Published in the ROH (AM):
 Approved as Modified by Assembly Floor Action as Published in the ROH (AMF):
 Disapproved (D):

5) Proposed Modification (AMPC only):

Modify proposal as follows:

Table N1102.1.2. Equivalent U-Factors^(a)

Climate Zone	Fenestration U-Factor	Skylight U-Factor	Ceiling U-Factor	Frame Wall U-Factor	Mass Wall U-Factor	Floor U-Factor	Basement Wall U-Factor ^(b)	Crawl Space Wall U-Factor ^(b)
1	1.20	0.75	0.035	0.082	0.197	0.064	0.948	0.948
2	0.75	0.75	0.035	0.082	0.165	0.064	0.948	0.948
3	0.65	0.65	0.035	0.082	0.141	0.047	0.948	0.192
4 except Marine	0.40	0.60	0.030	0.082	0.141	0.047	0.084	0.084
5 and Marine 4	0.35	0.60	0.030	0.060	0.082	0.037	0.084	0.084
6	0.35	0.60	0.026	0.060	0.060	0.033	0.084	0.084
7 and 8	0.35	0.60	0.026	0.057	0.057	0.033	0.084	0.084

(a) Nonfenestration U-factors shall be obtained from measurement, calculation or an approved source.

(b) Foundation U-factor requirements shown in Table N1102.1.2 include wall construction and interior air films but exclude soil conductivity and exterior air films. U-factors for determining code compliance via Section N1102.1.3 (Total UA alternative) shall be modified to include soil conductivity and exterior air films.

6) Reason (State the reason and justification to support the Public Comment. Include a bibliography of any substantiating material. It is the responsibility of the commenter to make the material available at the Final Action Hearing):

The purpose of this proposed code change is to remove the ground (earth) conductance from the U-factor requirements in the IECC and Chapter 11 of the IRC. The ground is not an inherent characteristic of the building construction and is therefore an unnecessary and confusing element to include code's U-factor requirements. Additionally, the code gives no information about how the ground conductance effect is to be accounted for in the U-factor requirements and it is therefore difficult for code users (including code compliance software developers) to correctly and consistently match their calculations to the code requirements.

The proposed U-factors include only the foundation structure and insulation elements. They are based on the assumption of solid concrete foundation walls with an R-value of 0.375 for an assumed 6 inches of concrete. Where R-13 cavity or R-10 continuous insulation is required, the U-factor proposed here is based on the assumption of a finished framed wall with R-13 cavity insulation.

An identical proposal was unanimously approved by the IECC committee. This proposal was disapproved by the IRC because a floor modification was ruled out of order. This floor modification added clarifying text to footnote b and is included in this public comment.

This public comment does not change foundation insulation requirements.