



**AIA**  
Pennsylvania

UCC Review and Advisory Council  
PA Department of Labor & Industry  
651 Boas Street, Room 1613  
Harrisburg, PA 17121

October 9, 2019

### **AIA Pennsylvania Comment for RAC 2018 ICC Code Review**

The American Institute of Architects of Pennsylvania, a professional organization which represents nearly 3,000 architects and associate members in the Commonwealth, strongly recommends that the UCC Review and Advisory Council adopt the 2018 ICC Family of Codes and Standards in their entirety, without omissions or amendments, to preserve the integrity of the integrated references overall and avoid contradictions between code sections.

Building codes define the minimum standard of building performance and are an important tool to assure the health, safety and welfare of building occupants. Architects shoulder a long-term liability for each design realized for a period of 12 years after completion of a project.

Architects are intimately involved in the use and interpretation of the Uniform Construction Code during the design and development process, and in most cases, prior to the involvement of other licensed professionals, code officials, and contractors. Architects endeavor to provide the highest quality professional services and deliverables. The need for a modernized uniform field of reference for research and design efforts is of utmost importance.

The ICC Code development process is an internationally accepted protocol for code development and modification; identifying and processing code revisions promulgated by national committees of code officials, design professionals, code consultants, trade associations, builders, contractors, manufacturers, suppliers, government agencies, and anyone with an interest to address changes that have proven necessary as the code is used and enforced. The development of technologies in these referenced standards has allowed significant improvement to the build environment and in the ability to provide for the health, safety and welfare of the public.

AIA Pennsylvania opposes the rejection of provisions for adoption based on initial cost alone. A higher initial cost due to improved construction will typically yield consumer savings realized through the life cycle of the building due to reduced operating costs and greater durability, which in turn lead to greater building value. The 2018 ICC Codes in their entirety provide for an overall better building and increased safety for building occupants and consumers regardless of first cost. The Commonwealth should not de-value the health, safety, and welfare of its citizens.

For these reasons, AIA Pennsylvania firmly believes it is in the Commonwealth's best interest to recognize the value of the ICC development process and adopt the modifications as they are presented by the ICC in the 2018 ICC Family of Codes and Standards.

Sincerely,

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**The American Institute of Architects**

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