



To: ICC-ES Evaluation Committee

From: Michael Beaton, P.E.

Date: May 20, 2008

Subject: Proposed Revisions to the ICC-ES Acceptance Criteria for Quality Documentation, Subject AC10-0508-R1 (MB/MJ)

MEMO

Comments on the proposed revisions were received from Smith-Emery Laboratories, dated April 30, 2008, and from Haworth, dated May 14, 2008.

Staff agrees with the changes proposed by Haworth and supports revising the criteria as noted in their letter of May 14, 2008.

Responses to the Smith-Emery letter are as follows:

1. **Qualifying Inspections:** ICC-ES has been doing qualifying inspections of manufacturing facilities from the beginning of the ICC-ES program. The language being proposed in Section 1.4.6 is intended to clarify this point. While the \$1890.00 fee paid with each new report application includes the cost of a qualifying inspection by ICC-ES (in the continental US and Canada), there are cases when ICC-ES would not typically do the qualifying inspection: (1) when a third-party inspection program is required for the product, the qualifying inspection should be done by the inspection agency; and (2) when the report applicant chooses to use a third-party accredited inspection agency.
2. **Moving of Equipment:** The proposed language in Section 1.4.7.1 is intended to document ICC-ES's current policy.
3. **Changes in Manufacturing Equipment, Methods or Personnel, or in Product Specifications:** The proposed language in Section 1.4.7.2 is intended to document ICC-ES' current practice and will not result in a change of our policy regarding ownership of evaluation reports. There is a procedure for report holders to transfer ownership of a report to another party, which includes filing a new application and completing a form entitled "Consent for Transfer and Use of Data."