



20 April 2026

The Honorable Darrell Issa
Chairman
House Judiciary Committee
Subcommittee on Courts, Intellectual
Property, Artificial Intelligence, and the Internet
2138 Rayburn House Office Building
Washington, DC 20515

The Honorable Henry C. "Hank" Johnson
Ranking Member
House Judiciary Committee
Subcommittee on Courts, Intellectual
Property, Artificial Intelligence, and the Internet
2142 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Issa and Ranking Member Johnson,

Thank you for holding this timely hearing on "Protecting U.S. Leadership in Codes Development and Enhancing Public Access." We are grateful for your continued leadership on such an important topic for the Standards Development Organization (SDO) community.

IEEE is a leading global SDO and one of the world's largest technical professional organizations, with over 2,300 standards and projects. We develop and update standards through a rigorous, multi-sector, voluntary consensus process that is open to all interested parties. When participants join a standards development working group, the collaborative work product (i.e., the standard) is owned by the neutral, unbiased SDO, which makes it available to all interested parties on a non-discriminatory basis.

When there is public interest, we make our works available to governmental entities. The act of having the government cite and use our standards in law is traditionally called "incorporation by reference" (IBR). SDOs participate in this process with the understanding that they will retain the rights in the works, which provides SDOs the ability to protect the integrity of the standardized technology and generate revenue from the sale and licensing of the works that they create. This process enables SDOs to sustain ongoing standards creation, refinement, and updating.

IEEE appreciates the constructive discussions we have had with Subcommittee staff on the best path forward. While we have opposed the Pro Codes Act in the past, we have been exploring with the Subcommittee targeted suggestions concerning notice, time, and enforcement in hopes of finding a compromise that a broad coalition can support.

IEEE believes a balance is achievable. Such balance would preserve the high quality and expected integrity that we all rely on when it comes to the development of codes and standards to enhance global trade, support innovation, and address safety and security. We remain hopeful that the final Pro Codes text will reflect this approach, and we value the collaborative spirit this Committee has shown throughout.

We appreciate your continued engagement with the SDO community as you consider the bill's approach to improving accessibility of standards. As this legislation advances, we look forward to continuing our work with you.

Sincerely,

Alpesh Shah
Managing Director, IEEE Standards Association

Russell Harrison
Managing Director, IEEE-USA