



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

August 10, 2021

**20-IW1-AC
EXTENSION**

ALL MANUFACTURED HOME MANUFACTURERS

Dear Manufacturer:

To promote the purposes of the National Manufactured Housing Construction and Safety Standards Act of 1974 (Act), as amended, and assist the manufactured housing industry that is currently faced with window supply chain challenges, the U.S. Department of Housing and Urban Development (HUD) issues this Alternative Construction (AC) letter extension under the terms and conditions stated herein, where no affirmative action is needed to protect the public interest. In accordance with 24 Code of Federal Regulations (CFR) 3282.14(b)(3), HUD has determined that compliance with specific standards stated herein would be unreasonable due to the COVID-19 pandemic and national emergency. Specifically, the supply chain is currently unable to supply windows that conform to certain standards within 24 CFR part 3280 titled “Manufactured Home Construction and Safety Standards.” These supply chain issues, caused by the COVID-19 pandemic and national emergency, have resulted in an industry-wide request for HUD to extend an AC letter renewal specific to windows.

Due to the continued supply chain issues caused by the COVID-19 pandemic and national emergency, HUD is extending AC letter 20-IW1-AC, dated December 16, 2020, for production of manufactured homes at any Production Inspection Primary Inspection Agency (IPIA) certified manufactured home production facility **through June 30, 2022**, and includes an unlimited number of manufactured homes that may be constructed.

HUD is extending this AC letter as the supply chain is currently unable to supply windows compliant with the Manufactured Home Construction and Safety Standards. This AC extension is for production of manufactured homes at any Production Inspection Primary Inspection Agency (IPIA) certified manufactured home production facility and includes an unlimited number of manufactured homes that may be constructed. The windows will be certified in accordance with the AAMA 1701.2-12 and/or AAMA/WDMA/CSA 101/I.S.2/A440-11 standard, which meets or exceeds the standard incorporated by reference, AAMA 1701.2-95. **This AC letter extension shall no longer be valid on or after July 1, 2022.**

As a reminder, all AC manufactured homes built must have the letters “AC” in the serial number stamped on the manufactured home’s chassis and in all official paperwork.

HUD has determined that the issuance of this AC letter extension is consistent with the objectives of the Act. In accordance with 24 CFR § 3282.14(c) of the Manufactured Home Procedural and Enforcement Regulations (Regulations), HUD will not take enforcement action against the manufacturer for violations of 24 CFR §§ 3280.403(b)(1), (e), (e)(1)-(2), and 3280.404(b), insofar as these regulations reference a specific referenced standard, as long as the manufacturer meets the following requirements:

1. Before any manufactured homes can be built in accordance with this AC letter extension, the manufacturer shall inform the Department and its IPIA and Design Approval Primary Inspection Agency (DAPIA) of its need and option to use this AC letter extension. The notification to HUD, including the specific production facilities to be included, can be sent via email to the Department at:

MHSreporting@HUD.gov

2. This AC letter extension is not model specific. Reapproval of all model and construction drawings is not necessary as the alternative window standard accepted in the AC letter extension is in lieu of the applicable window standard under 24 CFR part 3280. This AC letter extension only permits nonconformance with of 24 CFR §§ 3280.403(b)(1), (e), (e)(1)-(2), and 3280.404(b), and does not permit nonconformance with any other regulations. The windows will be certified in accordance with the AAMA 1701.2-12 and/or AAMA/WDMA/CSA 101/I.S.2/A440-11 standard. Additionally, the installation of all windows must be completed in accordance with the window manufacturer's installation instructions.
3. This AC letter extension is valid from July 1, 2021 through **June 30, 2022**, and for an **UNLIMITED** number of homes. This AC letter extension shall no longer be valid on or after July 1, 2022.
4. Manufactured homes sold directly to the Federal Emergency Management Agency (FEMA) must be reported on the HUD form 302 with purchaser/consumer information for FEMA. FEMA is not a retailer of manufactured homes. Further, the location for shipment must reflect the physical address of the first destination of the home, whether it is a storage facility, holding facility, or FEMA field office for disaster deployment. Listing FEMA's headquarters as the shipping address is not appropriate. Manufactured homes sold to or through a retailer or distributor for consumer purchase shall be reported with retailer information and consumer information completed.
5. The manufacturer must ensure that FEMA or each prospective purchaser receives a copy of the enclosed "Notice to Purchaser" (see "Exhibit A") before entering into any sales agreement. The manufacturer must place the "Notice to Purchaser" in clear view in the kitchen area of the home. It must not be removed until the sale of the home is complete.

6. The manufacturer must provide HUD with a cumulative production status report (see Exhibit B) by August 1, 2022. The production status reports must be cumulative for and include all the information identified in “Exhibit B.” The manufacturer must submit this report electronically to HUD at:

MHSreporting@hud.gov

If the manufacturer cannot send the report electronically, please send the paper copy report to the following address:

U.S. Department of Housing and Urban Development
Office of Manufactured Housing Programs
451 7th Street, SW, Room 9170
Washington, DC 20410-8000

HUD is forwarding a copy of this letter to all IPIAs and DAPIAs. After the manufacturer has provided notification to the Department, the IPIA(s) and DAPIA(s) may use this AC letter extension, which authorizes the IPIA to permit the use of this AC letter extension and authorizes the DAPIA to approve plans that reference this AC letter extension provided that the conditions set forth in the letter are met. HUD also forwarding a copy of this letter to all State Administrative Agencies.

HUD’s decision does not affect any rights that manufactured home purchasers may have under the Act. This decision is limited solely to the subject request and only applies to the manufacturer’s manufacturing operations that have been certified to build manufactured homes.

Please reference HUD File No. 20-IW1-AC in any correspondence about this specific AC extension. If you have any questions concerning this matter, please contact Mr. Jason McJury of this office at (202) 402-2480 or by email at Jason.C.McJury@hud.gov.

Sincerely,

8/10/2021

X 

Teresa B. Payne, Administrator
Office of Manufactured Housing Programs
Signed by: TERESA PAYNE

Enclosures

cc: IBTS; ALL SAAs; ALL IPIAs; ALL DAPIAs

EXHIBIT A

20-IW1-AC ALL MANUFACTURED HOME MANUFACTURERS (WINDOWS)

NOTICE TO PURCHASER/OCCUPANT

The U.S. Department of Housing and Urban Development (HUD) has issued an extended Alternative Construction (AC) Letter No. 20-IW1-AC, EXTENSION. available to all manufactured home manufacturers.

As constructed in the factory, this home may not meet certain aspects of the Federal Manufactured Home Construction and Safety Standards (Standards). Specifically, the testing and certification standard for your home's windows performed to the AAMA 1701.2-12 or AAMA 101 standard. While this standard meets or exceeds the same performance testing as 1701.2-95, it does not meet the specific standard outlined in HUD's 24 Code of Federal Regulations 3280.403 which call for certification to AAMA 1701.2-95.

The windows are installed in accordance with the product manufacturer's installation instructions, DAPIA-approved drawings, instructions, specifications, and comply with the AAMA 1701.2-12 and/or AAMA/WDMA/CSA 101/I.S.2/A440-11.

HUD evaluated this alternative construction concept and concluded that it provides levels of quality, durability, and safety that are equivalent to those required by the Federal Standards. To comply with the approval letter issued to the manufacturer, the letters "AC" must appear in your home's serial number.

For further information about the specific Federal Standards involved, a copy of the letter issued by HUD to the manufacturer pursuant to 24 CFR 3282.14(b) is available from this retailer/dealer or the manufacturer upon request.

A copy of this Notice must be provided to the Home Purchaser/Occupant and must be temporarily affixed in a location within the kitchen area of the home.

EXHIBIT B

**20-IW1-AC EXTENSION - ALL MANUFACTURED HOME MANUFACTURERS
(WINDOWS)**

CUMULATIVE PRODUCTION STATUS REPORT

Ending date: _____

(Reported Annually)

AC Valid thru: **JUNE 30, 2022**

Plant Location: _____

Max. No. of Homes Approved:
UNLIMITED

Serial Number	HUD Label Number	Retailer/Dealer Name and Location	Name, Address, Email & Phone # of Homeowner	Date of Manufacture

Authorized Manufacturer's Representative

Title: _____ Date: _____

Copy to HUD