



MANUFACTURED HOUSING CONSENSUS COMMITTEE

1.888.602.4663 | MHCC@HUD.GOV | MHCC@HOMEINNOVATION.COM

Meeting Minutes Manufactured Housing Consensus Committee

June 24, 2025

Meeting Minutes

Manufactured Housing Consensus Committee (MHCC)

June 24, 2025

Tuesday, June 24, 2025

Call to Order

The Manufactured Housing Consensus Committee (MHCC) meeting was held via webinar on Tuesday, June 24, 2025. Kevin Kauffman, Administering Organization (AO) Home Innovation Research Labs, called the roll and announced that a quorum was present. See [Appendix A](#) for a list of meeting participants.

Introduction and Opening Remarks

Aaron Howard, Chairperson, welcomed everyone to the meeting and briefly discussed the goals of the meeting, which were to provide comments and edits to the language provided by HUD regarding the regulations and chassis requirements for multi-story homes. MHCC comments and edits to the HUD Redline of Chassis Regulations and Requirements for Multi-Story Homes can be found in [Appendix C](#).

Tara Brunetti, Vice chairperson, thanked everyone for their time and welcomed everyone to the meeting.

HUD staff present introduced themselves. Mary Jo Houton, Administrator Office of Manufactured Housing Programs and Designated Federal Official (DFO) welcomed the committee members and introduced herself. She stated that it's an honor to be the DFO and provided a brief background of her previous roles in HUD and in the housing/banking industry. She introduced Frank Cassidy, the Principal Deputy Assistant Secretary for the Office of Housing and the Federal Housing Administration at HUD. Ms. Houton thanked the Principal Deputy Assistant Secretary for the support in removing barriers and expanding consumer choice. She detailed Mr. Cassidy's background, why his support is needed, and expressed her appreciation for his participation in the meeting.

Mr. Cassidy thanked Ms. Houton and the MHCC for the opportunity to speak and expressed the importance of both the MHCC and the topics of discussion. Mr. Cassidy appreciated the hard work that goes into making sure that manufactured housing is, and remains, an important part of the solution for affordable housing. Mr. Cassidy said streamlining programs like the manufactured housing program and ensuring the program works for the American people is an honor. He has witnessed various programs at HUD and the Federal Housing Administration (FHA) evolve over time and wants to ensure that regulation and red tape do not hinder evolution. Mr. Cassidy shared that he personally witnessed the quality and durability that goes into producing a HUD manufactured home. In his opinion, modern manufactured homes compete with stick-built homes in all aspects. Manufacturers of these homes, some of whom are present today, are doing an excellent job moving this industry forward. Increasing the availability of manufactured homes is a top priority of this administration. Barriers and red tape must be removed which inhibit manufacturers from producing the homes which the American people desire. Working with Mary Jo and her team, Mr. Cassidy is looking forward to make the code clearer, easier, and less operationally challenging. Mr. Cassidy announced the first ever Manufactured Housing Lender Roundtable where top

manufactured housing lenders will gather to discuss challenges and opportunities in financing manufactured homes. Industry stakeholders, like the ones in this meeting, are needed to provide input to help address these challenges. Mr. Cassidy exclaimed that a chassis on the second story of the manufactured home makes no sense. We are going to address this concern head on and find a solution. The highest levels of HUD are focused on providing manufactured housing to all Americans.

Ms. Houton again thanked the Principal Deputy Assistant Secretary for his time and comments. The White House has instructed agencies to increase housing supply by removing unnecessary expenses. Revising the regulation requiring a chassis for the second story of a home would be a welcomed change to the MHCSS. To address this issue, HUD is considering an amendment for the definition of “manufactured home” which would require a chassis only for the first story of a manufactured home. Manufactured housing is one of the most important forms of housing today and can provide an affordable housing solution for many Americans. We are here today to collaborate, listen, and problem solve to address this concern. Ms. Houton also wanted to spend a few moments to provide some updates since the last MHCC meeting. Highlighting Jayar Daily and Leo Poggione who were both reappointed, and introduced the five new MHCC members, Grant Beck, Robert Gann, Jim Hightower, Shelonda Marie-Alves, and Evon Smith. DFO Houton recognized and thanked the members whose final terms ended in 2024, Stacey Epperson, Nicole Hebbe, Peter James, Michael Moglia, and Robert Parks. The MHCC is essential to reach the goal of ensuring that affordable and durable housing is attainable for Americans. DFO Houton shared the compliance deadline for the Department of Energy (DOE) rule related to manufactured housing energy efficiency has been extended for multi section homes. Ms. Houton provided a few Office of Manufactured Housing Programs (OMHP) staff updates. DFO Houton shared the previous Administrator and DFO, Teresa Payne, retired from HUD and commented on the lasting legacy Ms. Payne left at HUD.

MHCC members each introduced themselves and provided some background information relating to their experience with the manufactured housing industry.

Public Comment Period

See [Appendix B](#) for written public comments received prior to the meeting.

Lesli Gooch, Manufactured Housing Institute (MHI), welcomed everyone to the meeting. Ms. Gooch shared her appreciation to HUD for bringing this topic forward which will propel the manufactured housing industry forward. MHI generally supports removing the chassis requirement for upper levels of a manufactured home but MHI has some select revisions to the language provided by HUD. These suggested changes were submitted with MHI’s written comments prior to the meeting. Ms. Gooch believes that the language MHI provided in their comments addresses some shortcomings of the proposed edits. MHI would like to address some of the letters of concern that the MHCC received prior to this meeting. Ms. Gooch refuted the notion that HUD code homes are somehow unsafe or inadequate. HUD had a statutory requirement to provide low-cost housing to all Americans and this change would aid them in that charge. Multi-story HUD code homes are not new, but it is very exciting that HUD is bringing the chassis requirement topic forward for discussion. Ms. Gooch references some previous comments from the MHCC advocating the advancement of the manufactured housing industry and the MHCSS. Ms. Gooch thanked HUD and the committee and shared that MHI is looking forward to collaborating with the MHCC.

Daniel Weber, SMGB Law representing MHI, thanked everyone for the opportunity to participate and thanked HUD for bringing this topic forward. Mr. Weber indicated that there is pending legislation which would address the chassis concern, but the proposed changes is something that could be done now. Mr. Weber suggested keeping the definition in the MHCSS as close to the statutory definition as possible.

Mark Weiss, Manufactured Housing Association for Regulatory Affairs (MHARR), thanked everyone for their work on the MHCC and for having these meetings to update the standard. Mr. Weiss commented on the format/procedure of the public comment windows during MHCC meetings and shared his belief that members of the public should be allowed to participate in the entire meeting, not only specified public comment windows. MHARR represents regulated parties, and Mr. Weiss believes they should be able to participate during the debates, not just before or after. With regard to the substance of this proposal, MHARR has historically advocated for changes that increase the advancement of the manufactured housing industry. Mr. Weiss shared his concerns that the change might be tailored to proprietary designs for certain manufacturers, which would be a concern and questioned if a cost benefit analysis had been carried out. Mr. Weiss believes that if HUD is the one submitting this change, HUD should have already performed the cost-benefit analysis and included the results in the proposal.

DFO Houton commented that the cost benefit analysis has not yet been performed and will take all the public comments into consideration.

MHCC Discussion on Comments and Edits to HUD's Redline of Chassis Regulations and Requirements for Multi-Story Homes

MHCC comments and edits to the HUD Redline of Chassis Regulations and Requirements for Multi-Story Homes can be found in [Appendix C](#).

The MHCC discussed in detail the proposed language and developed edits to the proposed language and general comments on the document.

Jason McJury, HUD, provided an overview of the specific changes shown in the document. Mr. McJury discussed each section that was modified and provided a brief explanation behind each change and answered MHCC questions.

The discussion focused primarily on the implications of removing the chassis from upper levels of a home and specifically what scenarios this would apply to. The MHCC wanted to ensure that the structural requirements would be properly met if this change was implemented and the various ways and methods in which manufacturers could meet the structural requirements if the steel chassis was no longer a requirement on upper levels. The MHCC discussed the impact of regional requirements, such as wind or snow loads, and how those requirements would still need to be met and are accounted for in other areas of the MHCSS.

John Weldy, Clayton Homes, a former MHCC member, provided some insight into how the fastening from one story to another would occur, indicating some combination of various strappings, sheathing, or other structural members.

The MHCC took a break from 1:45 pm to 2:00 pm eastern time.

In general, the MHCC was in favor of the proposed language. The edits recommended by the MHCC focused on clarity and ensuring workable language, not major revisions to the proposed text.

The MHCC discussed the cost implications if the steel chassis was no longer a requirement for upper levels. The MHCC focused their cost discussion on the cost difference of setting a multi-story home where a chassis is required for each transportable section and one where the chassis is only required for the transportable sections on the lowest level of the home. The MHCC generally agreed that this would likely be a cost savings as the steel chassis could potentially be reused.

MHCC members stated that this change would increase the availability of multi-story homes and would benefit both the industry and consumers.

Kaye Lawlis indicated that this type of change empowers consumer choice and allows manufacturers to provide a more robust portfolio of homes, which could be of great value.

Tim Sheahan indicated that he can see a large advantage in implementing changes such as these. Mr. Sheahan is hoping that HUD and manufacturers will seek opportunities to build more MH communities, especially in rural areas. Mr. Sheahan believes this could help meet the housing goals set by Congress.

Derek Dodon shared his thoughts on the potential cost savings associated with this change, identifying items such as reduction in steel required for a home, corrosion protective paint, chassis fasteners, among others.

MHCC Motion: Requesting the AO submit to HUD the comments and edits as recorded at this meeting regarding the changes to chassis regulations and requirements for multi-story homes.

Maker: Jayar Daily

Second: Keisha Hoggard

The motion carried unanimously.

Public Comment Period

Lesli Gooch, MHI, shared her excitement regarding this change and thanked everyone for their time and participation. Ms. Gooch believes that the efficiency of a national code and factory-built homes will be a major part of addressing the housing crisis.

Michael Moglia, Chief, Housing & Buildings Standards Division of the Commonwealth of Pennsylvania, and former MHCC member, appreciated the discussion during the MHCC meeting, especially the engineering contributions from Phillip Copeland and Jason McJury. Mr. Moglia stated that the installation issue regarding these homes cannot be overlooked, and foundations may need to be changed or modified. Mr. Moglia indicated there is a need to look at how the upper floors are going to be constructed and ensure they are structurally sound, which is an added complication to the process. Transferring the loads to foundations is still a requirement and there are further hurdles which will need to be addressed. Mr. Moglia questioned potential changes to how you lift these units if there is no longer a requirement for a chassis on upper levels and indicated that additional revisions to Subpart K may be required. There is a cost benefit analysis that should be done before this change is implemented. Mr. Moglia ended by thanking everyone for their hard work.

Wrap Up – DFO & AO

Chairperson Howard thanked everyone for their participation, welcomed the new members to the MHCC, and thanked the AO for their hard work.

DFO Houton thanked the chair, vice chair, AO, the MHCC, and members of the public for their participation which she believes is invaluable.

Kevin Kauffman, AO, provided a brief synopsis of the steps immediately following the MHCC meeting such as the review and approval of the minutes. He thanked them for their dedication, hard work, and recognized the outstanding and productive meeting.

Adjourn

The motion to adjourn the meeting was carried.

Certification of Minutes

I hereby certify that, to the best of my knowledge, the foregoing minutes are accurate and complete.

Aaron Howard
Manufactured Housing Consensus Committee Chair
Certified via email on July 28, 2024



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Appendix A: MHCC Attendance and Guests



MANUFACTURED HOUSING CONSENSUS COMMITTEE

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MHCC Attendance June 24, 2025

	Name	Attendance
General Interest / Public Official	Tara Brunetti	Y
	Jim Hightower	Y
	Keisha Hoggard	Y
	Aaron Howard	Y
	Kaye Lawlis	Y
	Shelonda Marie-Alves	Y
	Randy Saunders	Y
Producer	Phillip Copeland	Y
	Jayar Daily	Y
	Derek Dodson	Y
	Robert Gann	
	Leo Poggione	
	Sean Roberts	Y
	Manuel Santana	
User	Amy Batiste	
	Grant Beck	Y
	Rita Dilenno	Y
	David Kruczek	Y
	Tim Sheahan	Y
	Evon Smith	Y
	Joseph Sullivan	Y



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HUD Staff:

Geraldine Aguolu
Barry Ahuruonye
Wisam Alhajjaj
Dennaire Anderson
Adrian Browner
Frank Cassidy
Tommy Dison
Alan Field
Leo Huott
Mary Jo Houton
James Martin
Jason McJury
Glorianna Peng
Ruth Roman
Demetress Ross
Jun Shi

AO Staff, Home Innovation Research Labs:

Kevin Kauffman

Guests:

Nawroz Aziz
Mark Bowersox
Colin Burky
Brian Cordill
Rob Emard
Mary Gaiski
Leslie Gooch
Robert Gorleski
Rob Himor
Andrew Justus
Bill Moeller
Michael Moglia
Kelly Newcomer
Steve Randock Jr
William Sherman
Roger Sorensen
James Turner
Madeline Tweden
Daniel Weber
Mark Weiss
John Weldy
Rober Winder



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Appendix B: Written Public Comments

Public Comments Received for June 24, 2025, MHCC Meeting

- | | |
|---|--|
| 1 | Ryan Bish - Structural Modular Innovations, LLC. |
| 2 | Phillip Dickerson - Summit Edge Builders |
| 3 | Jason Drouse - Simplex Industries, Inc |
| 4 | Lesli Gooch - MHI |
| 5 | Tom Hardiman - Modular Home Builders Association |
| 6 | Kristina Smallhorn - Affordable Housing Advocate, YouTube Educator |
| 7 | Anthony Zarrilli - Zarrilli Homes |
-



June 22, 2025

Department of Housing and Urban Development
Attn: Manufactured Housing Consensus Committee
Re: Opposition to Removal of Steel Chassis Requirement

I am writing on behalf of the Structural Modular Innovations, LLC. in opposition to the proposal to remove the steel chassis requirement from the second story of HUD code manufactured homes.

In 1976, Congress passed the National Manufactured Housing Construction and Safety Standards Act, giving the Department of Housing and Urban Development (HUD) the authority to create a federal building code for factory-built housing. The aim was to protect consumers and ensure safe, affordable housing.

Removing the steel chassis requirements for second story HUD homes creates the potential for more public confusion. When the manufactured housing industry introduced its "Cross Mod" product, a hybrid between a traditional manufactured home and a modular home, the modular home industry voiced its concern. The manufactured housing industry's own marketing intelligence demonstrated that the public's perception of the term "manufactured" was only 11% favorable.

However, when the same type of home was labeled a "Cross Mod" favorability ratings shot up into the 40% range due to the public equating the term "Mod" with modern or modular. In short, the manufactured housing industry misled the public by labeling a HUD code home "mod" to improve public perception and increase market share.

While the term is still relatively new, we do not yet know the full ramifications of this marketing tactic. What will happen in five years when the owner of a Cross Mod home tries to sell it? Will the appraiser understand that the home is not built to the IRC? Will the lender? Will the owner be left in shock if his home did not increase in value as anticipated?

Already the lines are blurred at the consumers' expense as Cross Mods are accepted as comparable properties for appraising modular and site-built homes. Rather than an increase in property values, this change will likely have a negative impact on existing modular homeowners as their properties could decrease.



This change will also give HUD code manufacturers a significant regulatory advantage over modular home factories that must comply with various state codes and regulations. HUD manufacturers will be able to produce these “almost modular homes” while by-passing the rigorous quality control and inspection protocols of state level modular programs, all at the uniformed consumers’ expense. Does HUD have the authority to essentially take away an entire segment of housing authority from state and local code officials by replacing modular homes with almost modular homes regulated at the federal level?

Blurring the lines between HUD and modular also has a negative effect on the entire commercial modular construction industry and the schools, hospitals, restaurants, and multifamily projects across the country. Public confusion ultimately benefits no one.

In addition to intentionally confusing the public, this change also creates some serious safety concerns. The steel chassis is designed to provide structural support during transportation and installation. Removing it could compromise the structural integrity of the home, especially in areas prone to severe weather events. The chassis is part of the structural system that helps the home withstand forces like wind and seismic activity.

Manufactured housing provides the public with a safe and affordable option, as it was intended. Modular housing provides the public with a safer, more durable and disaster resilient home than manufactured homes, at a slight premium in cost.

At a time when disasters seem to be more severe and violent, and causing much greater damage, does it really make sense to remove structural components of a HUD code home? On behalf of the 150 member companies building IRC and state compliant modular homes, we oppose the recommendation to remove the steel chassis.

Sincerely,

A handwritten signature in black ink, appearing to read 'RJ Bish'.

Ryan J. Bish
Founding Partner/General Manager
Structural Modular Innovations, LLC.

To: Department of Housing and Urban Development
Attn: Manufactured Housing Consensus Committee
Re: Opposition to Removal of Steel Chassis Requirement

As a supporter of safe, durable, and clearly regulated housing, I strongly oppose the proposal to remove the steel chassis requirement for second-story HUD-code manufactured homes.

This change blurs the critical distinction between HUD-code manufactured housing and modular homes built to IRC or state-level codes. That confusion risks misleading consumers, lenders, and appraisers—especially given the history of misleading terms like “CrossMod,” which borrow credibility from modular housing while remaining fundamentally different in construction and code compliance.

Allowing HUD homes without a chassis to resemble modular homes would give HUD-code builders an unfair advantage, bypassing the more rigorous quality, safety, and inspection requirements modular builders face in each state. That undermines both consumer confidence and market fairness.

The steel chassis also serves a real structural function. Removing it without a clear and proven alternative raises serious safety concerns—particularly in areas subject to high winds, earthquakes, or other extreme conditions.

HUD-code housing plays a vital role in affordability. But weakening standards to expand market share at the cost of safety, clarity, and local authority is not the answer. I urge the Committee to reject this proposal.

Sincerely,
Phillip Dickson

Summit Edge Builders - Owner



June 24, 2025

Department of Housing and Urban Development
Attn: Manufactured Housing Consensus Committee
Re: Opposition to Removal of Steel Chassis Requirement

I am writing on behalf of Simplex Industries, Inc. (*a Modular Home Manufacturer located in Scranton, PA*) in opposition to the proposal to remove the steel chassis requirement from the second story of HUD code manufactured homes.

In 1976, Congress passed the National Manufactured Housing Construction and Safety Standards Act, giving the Department of Housing and Urban Development (HUD) the authority to create a federal building code for factory-built housing. The aim was to protect consumers and ensure safe, affordable housing. Removing the steel chassis requirements for second story HUD homes creates the potential for more public confusion. When the manufactured housing industry introduced its "Cross Mod" product, a hybrid between a traditional manufactured home and a modular home, the modular home industry voiced its concern. The manufactured housing industry's own marketing intelligence demonstrated that the public's perception of the term "manufactured" was only 11% favorable.

However, when the same type of home was labeled a "Cross Mod" favorability ratings shot up into the 40% range due to the public equating the term "Mod" with modern or modular. In short, the manufactured housing industry misled the public by labeling a HUD code home "mod" to improve public perception and increase market share.

While the term is still relatively new, we do not yet know the full ramifications of this marketing tactic. What will happen in five years when the owner of a Cross Mod home tries to sell it? Will the appraiser understand that the home is not built to the IRC? Will the lender? Will the owner be left in shock if his home did not increase in value as anticipated?

Already the lines are blurred at the consumers' expense as Cross Mods are accepted as comparable properties for appraising modular and site-built homes. Rather than an increase in property values, this change will likely have a negative impact on existing modular homeowners as their properties could decrease.

This change will also give HUD code manufacturers a significant regulatory advantage over modular home factories that must comply with various state codes and regulations. HUD manufacturers will be able to produce these "almost modular homes" while by-passing the rigorous quality control and inspection protocols of state level modular programs, all at the uniformed consumers' expense. Does HUD have the authority to essentially take away an entire segment of housing authority from state and local code officials by replacing modular homes with almost modular homes regulated at the federal level?

Blurring the lines between HUD and modular also has a negative effect on the entire commercial modular construction industry and the schools, hospitals, restaurants, and multifamily projects across the country. Public confusion ultimately benefits no one.

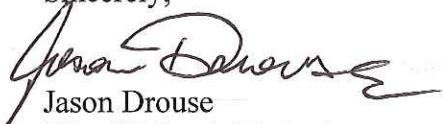
In addition to intentionally confusing the public, this change also creates some serious safety concerns. The steel chassis is designed to provide structural support during transportation and installation. Removing it could compromise the structural integrity of the home, especially in areas prone to severe weather events. The chassis is part of the structural system that helps the home withstand forces like wind and seismic activity.

Manufactured housing provides the public with a safe and affordable option, as it was intended. Modular housing provides the public with a safer, more durable and disaster resilient home than manufactured homes, at a slight premium in cost.

At a time when disasters seem to be more severe and violent, and causing much greater damage, does it really make sense to remove structural components of a HUD code home?

On behalf of all Modular Home companies building IRC and state compliant modular homes, we oppose the recommendation to remove the steel chassis.

Sincerely,



Jason Drouse
VP of Sales & Marketing
Simplex Industries, Inc.

Keyser Valley Industrial Park * 1 Simplex Drive * Scranton, PA 18504
Phone: (570) 346-5113 * Fax: (570) 346-3732 * Toll Free: (800) 233-4233

www.simplexhomes.com
www.facebook.com/simplexhomes



June 23, 2025

Home Innovation Research Labs
Attn: Kevin Kauffman
400 Prince Georges Blvd.
Upper Marlboro, Maryland 20774
mhcc@homeinnovation.com

RE: Department of Housing and Urban Development: Notice of Federal Advisory Committee Meeting; Manufactured Housing Consensus Committee (MHCC) Docket No. FR-6549-N-01

Dear Mr. Kauffman,

The Manufactured Housing Institute (MHI) is pleased to provide feedback to the Manufactured Housing Consensus Committee (MHCC) in advance of their meeting to discuss the Department of Housing and Urban Development's (HUD) proposal to remove the requirement for multi-story manufactured homes to be constructed with a permanent chassis. We hope that our comments are a useful guide for Committee members for their upcoming Committee meeting on June 24, 2025.

MHI is the only national trade association that represents every segment of the factory-built housing industry. Our members include home builders, suppliers, retail sellers, lenders, installers, community owners, community operators, and others who serve the industry, as well as 48 affiliated state organizations. In 2024, our industry produced 103,314 homes, accounting for nearly 10 percent of new single-family home starts. These homes are produced by 38 U.S. corporations in 152 homebuilding facilities located across the country. MHI members represent over 90 percent of all manufactured homes constructed.

MHI strongly supports efforts to modernize the definition of a manufactured home by removing the outdated requirement that manufactured homes be constructed on a permanent chassis. We commend HUD and the MHCC for seeking ways to achieve this objective even with the current statutory limitations. The changes being considered would allow for greater design flexibility and construction efficiency, making HUD Code homes suitable to be sited anywhere single-family homes are, addressing the critical need for attainable housing across the country. The permanent chassis requirement reflects a legacy conception of manufactured housing that no longer aligns with the realities of today's market. Allowing multi-level manufactured homes to be built with or without a permanent chassis is a critical step toward modernizing HUD Code housing and expanding consumer choice. From a construction standpoint, eliminating the fixed steel frame from the upper floors removes major design barriers. Enhanced design flexibility, reduced unnecessary costs and material waste, and expanded options for today's homeowners can all become a reality with this change. Removing the chassis allows for more design flexibility, such as lower profiles, better integration with site-built neighborhoods, and improved energy efficiency. This change broadens the appeal of manufactured homes to consumers who might otherwise be priced out of homeownership.

In 2020, the MHCC voted in favor of a proposal submitted by MHI (Log 198) to amend the HUD Code's definition of "manufactured home" to remove the permanent chassis requirement, among other updates. The current definition of "manufactured home", which is three decades old, continues to curtail innovation. With industry launching a new class of manufactured homes that are indistinguishable from site-built homes (CrossMod) and moving into two- to four-unit designs, the industry continues to innovate to meet the nation's housing supply challenges and HUD needs to keep pace. In its passage of Log Item 198, the Committee included the following justification:

"MHCC recognizes that this change potentially creates a statutory conflict, but the MHCC wishes to create a definition that can be used to revise the statute. The committee believes that MH is the solution to the affordable housing crisis in this country and believes that this change in definition promotes innovation in our industry. The MHCC agrees that the defined terms in the MHCSS need to be updated and statutory changes need to be advanced at the federal level. MHCC believes that items such as, requiring a chassis, limiting square footage, and limiting structure size stifles innovation in manufactured housing."

MHI looks forward to helping the MHCC accomplish the aforementioned objective and makes the following recommendations to do so (*see Appendix 1 for MHI's detailed language and recommendations*).

While we are excited about momentum supporting updates to the definition of "manufactured home," we do believe it is imperative for the regulatory definition to remain substantially similar to the statutory definition. However, it is within HUD's regulatory purview to include language clarifying that nothing in the current definition of a "manufactured home" requires a permanent chassis for transportable sections other than the ones on the lowest floor. As such, MHI recommends that the MHCC not accept HUD's proposed definition, with the exception of Item 6 as amended.

With respect to Item 6, MHI recommends retaining this language, but urges the Committee to replace "ground floor" with "lowest floor." This change is needed because the use of the word "ground" may cause confusion as to what constitutes the "ground floor" of a manufactured home placed on a basement or garage.

Revisions should be made to 24 C.F.R. § 3280.6 to provide manufacturers with instructions as to how to stamp the serial number on a section of a home that does not have a permanent chassis. MHI recommends requiring a metal plate containing the serial number be installed with screws to the outside face of the foremost floor joist of any section that does not have a permanent chassis.

To improve conciseness, MHI recommends removing the HUD proposed language in 24 C.F.R. § 3280.11(d), as the wording becomes unnecessarily duplicative under the MHI-revised definition section 24 C.F.R. § 3280.2.

The proposed language at 24 C.F.R. § 3280.305(a)(2) should be clarified in order to allow for multi-plexes or multi-dwelling units (MDUs) and clarify which types of multi-plexes or MDUs are permitted when using sections that lack a permanent chassis. As written, the proposed language appears not to permit stacked multi-plexes or MDUs which the industry is capable of building and for which the market has demand. MHI recommends clarifying that upper floors are not required to be fastened to a chassis when a chassis is not present, to ensure the regulation accurately reflects construction practices for multistory homes. Additionally, MHI recommends deleting the last sentence of the section which may be interpreted to limit each multistory structure to a single manufactured home, rather than allowing 2 - 4 multi-unit multistory homes which would hinder innovation and flexibility in multistory design.

To strength clarity, the phrase “when a chassis is not present” should be added to the last sentence of 24 C.F.R. § 3280.305(e)(1)(ii). This addition makes clear which kinds of transportable units are subject to the regulations of that section.

Finally, for continuity across sections, MHI makes the same recommendations for 24 C.F.R. § 3285.5 and 24 C.F.R. § 3286.3 as it did for the definitions at 24 C.F.R. § 3280. By keeping constant the additions, deletions, and language edits across these three sections, any chance of confusion can be greatly reduced, thus ensuring the effectiveness of the regulations.

MHI is grateful to HUD for its thoughtful recommendations to the MHCC to expand the types of homes that can be built under the federal manufactured housing code. We strongly support the proposed change, with the recommendations we have suggested, to allow for multistory designs, which will help bring HUD Code homes to more communities across the country that are urgently seeking innovative housing supply solutions. While MHI continues to advocate for a legislative update to remove the permanent chassis requirement from the statutory definition of a manufactured home, we commend HUD for taking meaningful steps within the current framework to modernize the code and expand housing opportunities.

These changes represent more than just technical updates—they are a signal that federal housing policy is evolving to meet the needs of today’s families and tomorrow’s communities. By enabling greater design flexibility and removing outdated barriers, HUD and the MHCC are helping to unlock the full potential of manufactured housing as a scalable, high-quality, and affordable solution to the nation’s housing crisis. MHI appreciates the opportunity to contribute to this important work and looks forward to continued collaboration to ensure these reforms are effectively implemented and deliver lasting impact.

Sincerely,

A handwritten signature in black ink that reads "Lesli Gooch". The signature is fluid and cursive, with the first name "Lesli" and last name "Gooch" clearly distinguishable.

Lesli Gooch, Ph.D.
Chief Executive Officer

Appendix 1

MHI's proposed language and recommendations below are for the MHCC's review and consideration in formulating the proposed rule.

PART 3280 - MANUFACTURED HOME CONSTRUCTION AND SAFETY STANDARDS

Subpart A – General

§ 3280.2 Definitions.

MHI Recommendation: Reinstate HUD's proposed deletion below.

Manufactured home means a structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length or which when erected on-site is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280. The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b).

MHI Recommendation: Delete HUD's proposed changes below.

~~Manufactured home means a structure, transportable in one or more sections, which—~~

~~(1)(i)(A) in the traveling mode is 8 body feet or more in width or 40 body feet or more in length,~~

~~or~~

~~(B) when erected on site is 320 or more square feet, and~~

~~(ii) is built on a permanent chassis, and~~

~~(iii) designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and~~

~~(iv) includes plumbing, heating, air conditioning, and electrical systems contained in the structure.~~

~~(2) This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280.~~

~~(3) The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site.~~

~~(4) These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows.~~

~~(5) Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards or that it is automatically eligible for financing under 12 U.S.C. 1709(b).~~

MHI Recommendation: Retain HUD's proposed item 6 but replace the word "ground" with "lowest".

(6) Nothing in this definition requires each transportable section to be built or transported on a permanent chassis except for the transportable sections to be used as the ~~ground~~ **lowest** floor of a manufactured home.

MHI Recommendation: Add "In cases where a permanent chassis is not present, a metal data plate bearing the serial number may be securely affixed – using screws – to the outside face of the foremost floor joist," after the first sentence.

§ 3280.6 Serial number.

- (a) A manufactured home serial number which will identify the manufacturer and the state in which the manufactured home is manufactured, must be stamped into the foremost cross member. Letters and numbers must be $\frac{3}{8}$ inch minimum in height. Numbers must not be stamped into hitch assembly or drawbar.

§ 3280.11 Certification Label

§ 3280.11(d)

(d) The label must be located at the taillight end of each transportable section of the manufactured home approximately 1 foot up from the floor and 1 foot in from the road side, or as near that location on a permanent part of the exterior of the manufactured home section as practicable. The road side is the right side of the manufactured home when one views the manufactured home from the tow bar end of the manufactured home. If locating the label on the taillight end of a transportable section will prevent the label from being visible after the manufactured home section is installed at the installation site, the label must be installed on a permanent part of the exterior of the manufactured home section, in a visible location as specified in the approved design. Nothing in this section shall require a transportable section of a

~~manufactured home to be used as an upper floor of a multistory manufactured home to be built on a permanent chassis.~~ MHI Recommendation: Remove this HUD proposed addition.

Subpart D – Body and Frame Construction Requirements

§ 3280.305 Structural design requirements.

(a)(1) *General requirements.* Each manufactured home must be designed and constructed as a completely integrated structure capable of sustaining the design load requirements of this part and must be capable of transmitting these loads to stabilizing devices without exceeding the allowable stresses or deflections. Roof framing must be securely fastened to wall framing, walls to floor structure, and floor structure to chassis to secure and maintain continuity between the floor and chassis, so as to resist wind overturning, uplift, and sliding as imposed by design loads in this part. Uncompressed finished flooring greater than 1/8 inch in thickness must not extend beneath load-bearing walls that are fastened to the floor structure.

MHI Recommendation: Add “when a chassis is not present” to the end of the first sentence and delete the second sentence.

(2) *Multistory manufactured homes.* In multistory construction, each story must be securely fastened to the story above and/or below to provide continuity and resist design loads in this part except that upper floors do not need to be fastened to a chassis when a chassis is not present.

~~Each multistory structure shall be limited to a single manufactured home.~~

(e) *Fastening of structural systems.*

(1)(i) *General requirements.* Roof framing must be securely fastened to wall framing, walls to floor structure, and floor structure to chassis, to secure and maintain continuity between the floor

and chassis in order to resist wind overturning, uplift, and sliding, and to provide continuous load paths for these forces to the foundation or anchorage system. The number and type of fasteners used must be capable of transferring all forces between elements being joined. ~~In multistory construction, each story must be securely fastened to the story above and/or below to provide continuity and resist design loads in this section.~~

(ii) *Multistory manufactured homes.* In addition to the requirements in paragraph (e)(1)(i), in multistory construction, each story must be securely fastened to the story above and/or below to provide continuity and resist design loads in this section except that upper floors do not need to be fastened to a chassis **when a chassis is not present.**

Subpart J – Transportation

§ 3280.901 Scope.

Subpart J of this standard covers the general requirement for designing the structure of the manufactured home to fully withstand the adverse effects of transportation shock and vibration without degradation of the integrated structure or of its component parts and the specific requirements pertaining to the transportation system and its relationship to the structure. ~~In multistory construction, nothing in this subpart shall require a transportable section designed to be used as an upper floor of a multistory manufactured home to be built or transported on a permanent chassis.~~

§ 3280.902 Definitions.

(f) *Transportation system,* ~~(Same as chassis above)~~ refers to the chassis.

§ 3280.904 Specific requirements for designing the transportation system.

(b)(9)(i) *Braking axles*. The number, type, size, and design of brake assemblies required to assist the towing vehicle in providing effective control and stopping of the manufactured home must be determined and documented by engineering analysis. Those alternatives listed in § 3280.903(c) may be accepted in place of such an analysis. Unless substantiated in the design to the satisfaction of the approval agency by either engineering analysis in accordance with § 3280.903(a)(b)(1) or tests in accordance with paragraph (b)(9)(ii) of this section, there must be a minimum of two axles equipped with brake assemblies on each manufactured home transportable section

DRAFT

PART 3285—MODEL MANUFACTURED HOME INSTALLATION STANDARDS

Subpart A – General.

§ 3285.5 Definitions. **MHI Recommendation: same as recommendations for 3280**

Manufactured home. ~~A structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length, or which when erected on site is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements, except the size requirements and with respect to which the manufacturer voluntarily files a certification, pursuant to § 3282.13 of this chapter, and complies with the MHCSS set forth in part 3280 of this chapter. The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b) certification.~~

Manufactured home means a structure, transportable in on or more sections, which –

(1)(i)(A) in the traveling mode is 8 body feet or more in width or 40 body feet or more in length,
or

(B) when erected on-site is 320 or more square feet, and

(ii) is built on a permanent chassis, and

(iii) designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and

(iv) includes plumbing, heating, air-conditioning, and electrical systems contained in the structure.

(2) This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280.

(3) The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site.

(4) These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows.

(5) Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards or that it is automatically eligible for financing under 12 U.S.C. 1709(b).

(6) Nothing in this definition requires each transportable section to be built or transported on a permanent chassis except for the transportable sections to be used as the ground floor of a manufactured home.

3286—MANUFACTURED HOME INSTALLATION PROGRAM

Subpart A—Generally Applicable Provisions and Requirements.

§ 3286.3 Definitions. MHI Recommendation: same as recommendations for 3280

Manufactured home means a structure, transportable in one or more sections, which, in the traveling mode, is 8 body feet or more in width or 40 body feet or more in length, or, when erected on site, is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained therein. The term also includes any structure that meets all the requirements of this paragraph except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the installation standards established under part 3285 and the construction and safety standards in part 3280 of this chapter, but such term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b).

Manufactured home means a structure, transportable in on or more sections, which –

(1)(i)(A) in the traveling mode is 8 body feet or more in width or 40 body feet or more in length,
or

(B) when erected on-site is 320 or more square feet, and

(ii) is built on a permanent chassis, and

(iii) designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and

(iv) includes plumbing, heating, air-conditioning, and electrical systems contained in the structure.

(2) This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280.

(3) The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site.

(4) These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows.

(5) Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards or that it is automatically eligible for financing under 12 U.S.C. 1709(b).

(6) Nothing in this definition requires each transportable section to be built or transported on a permanent chassis except for the transportable sections to be used as the ground floor of a manufactured home.

DRAFT



June 20, 2025

Department of Housing and Urban Development
Attn: Manufactured Housing Consensus Committee
Re: Opposition to Removal of Steel Chassis Requirement

I am writing on behalf of the Modular Home Builders Association in opposition to the proposal to remove the steel chassis requirement from the second story of HUD code manufactured homes.

In 1976, Congress passed the National Manufactured Housing Construction and Safety Standards Act, giving the Department of Housing and Urban Development (HUD) the authority to create a federal building code for factory-built housing. The aim was to protect consumers and ensure safe, affordable housing.

Removing the steel chassis requirements for second story HUD homes creates the potential for more public confusion. When the manufactured housing industry introduced its “Cross Mod” product, a hybrid between a traditional manufactured home and a modular home, the modular home industry voiced its concern. The manufactured housing industry’s own marketing intelligence demonstrated that the public’s perception of the term “manufactured” was only 11% favorable.

However, when the same type of home was labeled a “Cross Mod” favorability ratings shot up into the 40% range due to the public equating the term “Mod” with modern or modular. In short, the manufactured housing industry misled the public by labeling a HUD code home “mod” to improve public perception and increase market share.

While the term is still relatively new, we do not yet know the full ramifications of this marketing tactic. What will happen in five years when the owner of a Cross Mod home tries to sell it? Will the appraiser understand that the home is not built to the IRC? Will the lender? Will the owner be left in shock if his home did not increase in value as anticipated?

Already the lines are blurred at the consumers’ expense as Cross Mods are accepted as comparable properties for appraising modular and site-built homes. Rather than an increase in property values, this change will likely have a negative impact on existing modular homeowners as their properties could decrease.

This change will also give HUD code manufacturers a significant regulatory advantage over modular home factories that must comply with various state codes and regulations. HUD manufacturers will be able to produce these “almost modular homes” while by-passing the rigorous quality control and inspection protocols of state level modular programs, all at the uniformed consumers’ expense. Does HUD have the authority to essentially take away an entire segment of housing authority from state and local code officials by replacing modular homes with almost modular homes regulated at the federal level?

Blurring the lines between HUD and modular also has a negative effect on the entire commercial modular construction industry and the schools, hospitals, restaurants, and multifamily projects across the country. Public confusion ultimately benefits no one.

In addition to intentionally confusing the public, this change also creates some serious safety concerns. The steel chassis is designed to provide structural support during transportation and installation. Removing it could compromise the structural integrity of the home, especially in areas prone to severe weather events. The chassis is part of the structural system that helps the home withstand forces like wind and seismic activity.

Manufactured housing provides the public with a safe and affordable option, as it was intended. Modular housing provides the public with a safer, more durable and disaster resilient home than manufactured homes, at a slight premium in cost.

At a time when disasters seem to be more severe and violent, and causing much greater damage, does it really make sense to remove structural components of a HUD code home? On behalf of the 150 member companies building IRC and state complaint modular homes, we oppose the recommendation to remove the steel chassis.

Sincerely,

A handwritten signature in cursive script that reads "Tom Hardiman".

Tom Hardiman
Executive Director
Modular Home Builders Association

From: [Kristina Smallhorn](#)
To: [MHCC](#)
Subject: Opposition to Proposed Changes Blurring the Lines Between HUD and IRC Code Homes
Date: Sunday, June 22, 2025 6:44:18 PM

Dear Members of the MHCC,

My name is Kristina Smallhorn, and I am an advocate for affordable housing and a YouTube educator who helps millions of viewers better understand their housing options. I'm writing to express my concern and opposition to the proposed changes allowing for the removal of the steel chassis from HUD Code homes intended to serve as second stories on single-family multi-story structures.

While I support efforts to increase affordable housing, this proposal threatens to further blur the already confusing line between manufactured and modular homes. That confusion doesn't help consumers — it misleads them. I regularly hear from viewers who are already baffled by the differences between modular and manufactured homes, and changes like these make it even harder for them to make informed decisions.

The fact is, manufactured homes built under HUD Code do not meet the same local and regional safety, structural, and energy standards as IRC-compliant modular homes. Modular homes must conform to the same building codes as site-built homes, while HUD Code homes follow a national standard that often lacks the same level of rigor — especially in critical areas like wind resistance and structural integrity.

Diluting the definition of modular homes by allowing HUD Code homes to appear similar in form without meeting the same standards does a disservice to both consumers and the modular home industry. It may serve short-term business interests, but at the long-term cost of public trust and

safety.

I respectfully urge the Committee to reconsider this proposal and prioritize maintaining a clear and enforceable distinction between manufactured and modular housing. Consumers deserve transparency. The industry needs integrity. And affordable housing should never come at the expense of safety or clarity.

Thank you for your time and consideration.

Sincerely,

Kristina Smallhorn

Affordable Housing Advocate | YouTube Educator

(225) 246-1812

info@kristinasmallhorn.com

[YouTube Channel – Kristina Smallhorn](#)

Kristina Smallhorn is a licensed REALTOR with the state of Louisiana.

From: [Anthony Zarrilli](#)
To: [MHCC](#)
Subject: Modular Homes and HUD Homes
Date: Sunday, June 22, 2025 8:59:30 AM

Good morning,

I have been in the modular industry for over 30 years and sit on various boards (MHBA, etc.) as well as local boards and been highlighted on many tv shows (i.e. This Old House, etc.) and also have done many speaking engagements around the country educating the public on our industry. I think this new legislation “for” HUD housing isn’t justifiable and in short not fair to the modular home industry. This is blurring the lines between the two industries all for the dollar and not for the better of the consumer. I believe this should be rethought and the current legislation proposed should not be approved. A suggestion is to have the top individuals in both segments of the housing market have a meeting that will work towards a common goal to help elevate both industries with a better language. I can be reached anytime to discuss further at my office number below. I would be more than happy to be part of these discussions if so needed. Thanks for your time and consideration. Have a wonderful day.

Stay safe and healthy,
Anthony Zarrilli
Principal



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Appendix C: MHCC Comments and Edits to HUD Redline of Chassis Regulations and Requirements for Multi-Story Homes



MANUFACTURED HOUSING CONSENSUS COMMITTEE

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MHCC Comments on HUD Redline of Chassis Regulations and Requirements for Multi-Story Homes

To whom it may concern,

On Tuesday June 24, 2025 the Manufactured Housing Consensus Committee (MHCC) held a special meeting via teleconference to discuss and comment on the HUD Redline of Chassis Regulations and Requirements for Multi-Story Homes. Home Innovation Research Labs, the Administering Organization (AO) of the MHCC, is submitting, by request of the MHCC, the comments as recorded during that meeting. The MHCC comments are in blue text below.

- See proposed revisions to the HUD Redline document attached to this letter. Changes are shown in blue legislative text and are highlighted in yellow.
- MHCC agrees in principle with the intent and direction of the changes shown in the proposed modification. The MHCC believes that removing the unnecessary chassis from upper floors could be a cost-effective measure to enhance architectural design. Increasing the availability of multistory homes could benefit consumers, increase consumer choice, and be a part of the solution to affordable housing.
- MHCC has some concerns about changing the format of the definition in 3280.2 and others as it could lead to confusion with the definition no longer directly matching the statutory definition.

MHCC Modifications to HUD Redline of Chassis Regulations and Requirements for Multi-Story Homes

MHCC recommended changes are shown in blue legislative text and highlighted in yellow.

Manufactured Housing Consensus Committee

The following text reflects the proposed change the Office of Manufactured Housing Programs (OMHP) would like to make in order to remove the chassis from the second floor of a multi-storied home. This language is illustrative and may or may not be used for purposes of moving forward with a rulemaking.

PART 3280 - MANUFACTURED HOME CONSTRUCTION AND SAFETY STANDARDS

Subpart A – General

§ 3280.2 Definitions.

~~Manufactured home means a structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length or which when erected on site is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280. The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when~~

~~erected on site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b).~~

Manufactured home means a structure, transportable in one or more sections, which –

(1)(i)(A) in the traveling mode is 8 body feet or more in width or 40 body feet or more in length,

or

(B) when erected on-site is 320 or more square feet, and

(ii) is built on a permanent chassis, and

(iii) designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and

(iv) includes plumbing, heating, air-conditioning, and electrical systems contained in the structure.

(2) This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280.

(3) The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each

transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site.

(4) These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows.

(5) Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards or that it is automatically eligible for financing under 12 U.S.C. 1709(b).

(6) Nothing in this definition requires each transportable section to be built or transported on a permanent chassis except for the transportable sections designed to be used as the ground lowest floor of a manufactured home.

§ 3280.6 Serial number.

(a) A manufactured home serial number which will identify the manufacturer and the state in which the manufactured home is manufactured, must be stamped into the foremost cross member. In cases where a permanent chassis is not present, a metal plate stamped with the serial number must be securely affixed, using screws, to the inside face of the foremost floor joist. Letters and numbers must be 3/8 inch minimum in height. Numbers must not be stamped into hitch assembly or drawbar.

§ 3280.11 Certification Label

§ 3280.11(d)

(d) The label must be located at the taillight end of each transportable section of the manufactured home approximately 1 foot up from the floor and 1 foot in from the road side, or

as near that location on a permanent part of the exterior of the manufactured home section as practicable. The road side is the right side of the manufactured home when one views the manufactured home from the tow bar end of the manufactured home. If locating the label on the taillight end of a transportable section will prevent the label from being visible after the manufactured home section is installed at the installation site, the label must be installed on a permanent part of the exterior of the manufactured home section, in a visible location as specified in the approved design. Nothing in this section shall require a transportable section of a manufactured home to be used as an upper floor of a multistory manufactured home to be built on a permanent chassis.

Subpart D – Body and Frame Construction Requirements

§ 3280.305 Structural design requirements.

(a)(1) *General requirements.* Each manufactured home must be designed and constructed as a completely integrated structure capable of sustaining the design load requirements of this part and must be capable of transmitting these loads to stabilizing devices without exceeding the allowable stresses or deflections. Roof framing must be securely fastened to wall framing, walls to floor structure, and floor structure to chassis to secure and maintain continuity between the floor and chassis, so as to resist wind overturning, uplift, and sliding as imposed by design loads in this part. Uncompressed finished flooring greater than 1/8 inch in thickness must not extend beneath load-bearing walls that are fastened to the floor structure.

(2) *Multistory manufactured homes.* In multistory construction, each story must be securely fastened to the story above and/or below to provide continuity and resist design loads in this part except that upper floors do not need to be fastened to a chassis when a chassis is not present.

Each multistory structure shall be limited to a single manufactured home consisting of one to four dwelling units.

(e) *Fastening of structural systems.*

(1)(i) *General requirements.* Roof framing must be securely fastened to wall framing, walls to floor structure, and floor structure to chassis, to secure and maintain continuity between the floor and chassis in order to resist wind overturning, uplift, and sliding, and to provide continuous load paths for these forces to the foundation or anchorage system. The number and type of fasteners used must be capable of transferring all forces between elements being joined. ~~In multistory construction, each story must be securely fastened to the story above and/or below to provide continuity and resist design loads in this section.~~

(ii) *Multistory manufactured homes.* In addition to the requirements in paragraph (e)(1)(i), in multistory construction, each story must be securely fastened to the story above and/or below to provide continuity and resist design loads in this section except that upper floors do not need to be fastened to a chassis when a chassis is not present.

Subpart J – Transportation

§ 3280.901 Scope.

Subpart J of this standard covers the general requirement for designing the structure of the manufactured home to fully withstand the adverse effects of transportation shock and vibration without degradation of the integrated structure or of its component parts and the specific requirements pertaining to the transportation system and its relationship to the structure. In

multistory construction, nothing in this subpart shall require a transportable section designed to be used as an upper floor of a multistory manufactured home to be built or transported on a permanent chassis.

§ 3280.902 Definitions.

(f) *Transportation system*, ~~(Same as chassis above)~~ refers to the chassis.

§ 3280.904 Specific requirements for designing the transportation system.

(b)(9)(i) *Braking axles*. The number, type, size, and design of brake assemblies required to assist the towing vehicle in providing effective control and stopping of the manufactured home must be determined and documented by engineering analysis. Those alternatives listed in § 3280.903(c) may be accepted in place of such an analysis. Unless substantiated in the design to the satisfaction of the approval agency by either engineering analysis in accordance with § 3280.903~~(a)~~(b)(1) or tests in accordance with paragraph (b)(9)(ii) of this section, there must be a minimum of two axles equipped with brake assemblies on each manufactured home transportable section

PART 3285—MODEL MANUFACTURED HOME INSTALLATION STANDARDS

Subpart A – General.

§ 3285.5 Definitions.

~~*Manufactured home.* A structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length, or which when erected on site is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements, except the size requirements and with respect to which the manufacturer voluntarily files a certification, pursuant to § 3282.13 of this chapter, and complies with the MHCSS set forth in part 3280 of this chapter. The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b) certification.~~

Manufactured home means a structure, transportable in one or more sections, which –
(1)(i)(A) in the traveling mode is 8 body feet or more in width or 40 body feet or more in length,
or

- (B) when erected on-site is 320 or more square feet, and
- (ii) is built on a permanent chassis, and
- (iii) designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and
- (iv) includes plumbing, heating, air-conditioning, and electrical systems contained in the structure.
- (2) This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280.
- (3) The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site.
- (4) These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows.
- (5) Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards or that it is automatically eligible for financing under 12 U.S.C. 1709(b).
- (6) Nothing in this definition requires each transportable section to be built or transported on a permanent chassis except for the transportable sections to be used as the ground floor of a manufactured home.

3286—MANUFACTURED HOME INSTALLATION PROGRAM

Subpart A—Generally Applicable Provisions and Requirements.

§ 3286.3 Definitions.

~~*Manufactured home* means a structure, transportable in one or more sections, which, in the traveling mode, is 8 body feet or more in width or 40 body feet or more in length, or, when erected on site, is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained therein. The term also includes any structure that meets all the requirements of this paragraph except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the installation standards established under part 3285 and the construction and safety standards in part 3280 of this chapter, but such term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on-site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b).~~

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or

(B) when erected on-site is 320 or more square feet, and

(ii) is built on a permanent chassis, and

(iii) designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and

(iv) includes plumbing, heating, air-conditioning, and electrical systems contained in the structure.

(2) This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to § 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280.

(3) The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site.

(4) These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows.

(5) Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards or that it is automatically eligible for financing under 12 U.S.C. 1709(b).

(6) Nothing in this definition requires each transportable section to be built or transported on a permanent chassis except for the transportable sections to be used as the ground floor of a manufactured home.