MHCC

Proposed Changes
and
Deregulation Comments

2018-2019 Cycle

August 1, 2018

Table of Contents

Proposed Change Status Summary 2018-2019 Cycle 1

Deregulation Comments from FR 6030-N-01 (HSG) 4

Deregulation Comments from FR 6075-N-01 5

Proposed Changes from Previous Cycles 11

Log 123 - § 3280.511(a)(2) Comfort cooling certificate and information 11

Proposed Changes 2018-2019 Cycle 12

Log 146 - § 3285.304 (b)(2) Pier configuration 12

Log 147 - § 3285.304 (c)(3) Pier configuration 13

Log 148 - § 3286.411 (b) Certifying installation 14

Log 149 - § 3280.609(c)(1)(iii)) Water distribution systems 15

Log 150 - § 3280.103(b) Light and ventilation 16

Log 151 - § 3280.607(b)(5)(ii) Standpipes - WITHDRAWN 17

Log 152 - § 3280 Attic 18

Log 153 - § 3282.416(a)(4) Oversight of notification and correction activities 19

Log 154 - § 3280.607(b)(3)(i) Plumbing fixtures 20

Log 155 - § 3280.504(a)(1) & 3280.504(d)(i) Ceiling vapor retarders 21

Log 156 - § 3280.103(b)(5) & 3280.103(b)(6) Light and ventilation 22

Log 157 - § 3280.109 Room requirements 23

Log 158 - § 3280.309 Health Notice on formaldehyde emissions 24

Log 159 - § 3280.1 Scope 26

Log 160 - § 3280.2 Definitions 27

Log 161 - § 3280.211 Toilet compartments 29

Log 162 - § 3282.8(l) Applicability 30

Log 163 - § 3282.202 Definitions 31

Log 164 - § 3285.2, paragraph (b)(4) Manufacturer installation instructions 33

Log 165 - § 3285.5 Definitions 34

Log 166 - § 3285.5 Definitions 35

Log 167 - § 3285.102 Installation of manufactured homes in flood hazard areas 36

Log 168 - § 3285.102(d) Installation of manufactured homes in flood hazard areas 37

Log 169 - § 3285.301(a) General 38

Log 170 - § 3280 Energy efficiency and affordability of manufactured housing 39

Log 171 - § 3280.607(b)(5)(ii) Standpipes 41
Log 172 - § 3282.255(a) Completion of information card 42
Log 173 - § 3280.105 Exit facilities; exterior doors 43
Log 174 - § 3280.203 and 3280.204 Fire protection and Kitchen Cabinet 45
Log 175 - § 3280.707 Heat producing appliances 47
Log 176 - § 3280.714 Appliances, cooling 48
Log 177 - § 3280.305 and 3280.306 Structural design requirements and Windstorm protection 49
Log 178 - § 3282.352 State exclusive IPIA functions 52
Log 179 - § 3280.2, 3282.8, 3282.14, 3282.601, and 3285.903 Accessory structure 53
Log 180 - § 3282.14(b) Alternative construction of manufactured homes 55
Log 181 - § 3282.14(c)(3) Alternative construction of manufactured homes 56
Log 182 - § 3282.7 Definitions; 3282 Subpart I Consumer Complaint Handling and Remedial Actions 57
Log 183 - § 3280.711 Instructions 59
Log 184 - § 3280.304 (b)(1) Materials & 3280.307 Resistance to elements and use 60
Log 185 - § 3280.106 Exit facilities; egress windows and devices 64
Log 186 - § 3280.6 Serial number 65
Log 187 - § 3280.105 Exit facilities; exterior doors 66
Log 188 - § 3280.607(b)(3)(i) Plumbing fixtures 67
Log 189 - § 3280.113 Glass and glazed openings 68
Log 190 - § 3286.803 State qualifying installation program & 3286.2 Applicability 69
Log 191 - § 3280.404. Standard for egress windows and devices for use in manufactured homes 70
Log 192 - § 3285.4(h)(2) Incorporation by reference (IBR) 71
Log 193 - § 3280.4 Incorporation by Reference & 3280.801 Scope 72
Log 194 - § 3282.7 (j), (x) and adding (lll) Definitions 74
Log 195 - § 3282 Subpart M - On-Site Completion of Construction of Manufactured Homes 76
Log 196 - § 3280.208 Requirements for foam plastic thermal insulating materials 87
Log 197 - § 3282.404(a) Standard for egress windows and devices for use in manufactured homes 90
Log 198 - § 3280.202 Definitions 91
Log 199 - § 3280.4 Incorporation by reference 93
Log 200 - § 3280.4 Incorporation by reference 94
Log 201 - § 3280.304 Materials 95
Log 202 - § 3280.403 Requirements for windows, sliding glass doors, and skylights 96
Log 203 - § 3280.404 Standard for egress windows and devices for use in manufactured homes 97
Log 204 - § 3280.405 Standard for swinging exterior passage doors for use in manufactured homes 98
Log 205 - § 3280.508 Heat loss, heat gain and cooling load calculations 99
Log 206 - § 3280.403 Requirements for windows, sliding glass doors, and skylights 100
Deregulation Comments from FR 6030-N-01 (HSG) 101
DRC # 1 – FR6030-N-01 – Regulatory 101

DRC # 2 – FR6030-N-01 – 75 CFR 5888 102
DRC # 3 – FR6030-N-01 – HUD Statute 103
DRC # 4 – FR6030-N-01 – 24 CFR part 3282 Subpart M 104
DRC # 5 – FR6030-N-01 – CFR part 3282 Subpart I 105
DRC # 6 – FR6030-N-01 – 24 CFR 3288 106
DRC # 7 – FR6030-N-01 – Regulatory 42 USC 5404 107
DRC # 8 – FR6030-N-01 – 24 CFR 3280.309 108
DRC # 9 – FR6030-N-01 – 24 CFR part 3282.11 109
DRC # 10 – FR6030-N-01 – Interpretive Bulletin 110
DRC # 11 – FR6030-N-01 – 24 CFR part 3286.803 111
DRC # 12 – FR6030-N-01 – Manufactured Housing Requirements 112
DRC # 13 – FR6030-N-01 – 24 CFR Part 3286.803 113
DRC # 14 – FR6030-N-01 – 24 CFR part 3286.803 114
DRC # 15 – FR6030-N-01 – 24 CFR 3285.312 115
DRC # 16 – FR6030-N-01 – Interpretive Bulletin 116
DRC # 17 – FR6030-N-01 – 24 CFR 3828 subpart M 117
DRC # 18 – FR6030-N-01 – 24 CFR part 3282 Subpart M 118
DRC # 19 – FR6030-N-01 – Outdated Regulations 119
DRC # 20 – FR6030-N-01 – 42 U.S.C. 5412 et al 120
DRC # 21 – FR6030-N-01 – Energy Independence and Security Act, Pub. L. 110–140 (2007) 121
DRC # 22 – FR6030-N-01 – Formaldehyde Notices 122
DRC # 23 – FR6030-N-01 – 24 CFR part 3282 123
DRC # 24 – FR6030-N-01 – 24 CFR Part 3282 124
DRC # 25 – FR6030-N-01 – 42 USC 5403 125
DRC # 26 – FR6030-N-01 – 42 U.S.C. 5412 et al 126
DRC # 27 – FR6030-N-01 – 24 CFR 203.205 127
DRC # 28 – FR6030-N-01 – 24 CFR Part 3282 Subpart M 128
DRC # 29 – FR6030-N-01 – 24 CFR Sections 3286.2 and 3286.803 129
DRC # 30 – FR6030-N-01 – Manufactured housing industry 130
DRC # 31 – FR6030-N-01 – Interpretive Bulletin 132
DRC # 32 – FR6030-N-01 – Regulatory 133
Deregulation Comments from FR 6075-N-01 134
DRC # 34 – FR6075-N-01 – HUD Code Updates MHCC 134
DRC # 35 – FR6075-N-01 – HUD Code Updates MHCC 134
DRC # 36 – FR6075-N-01 – HUD Code Updates 135
DRC # 37 – FR6075-N-01 – HUD Code 135
DRC # 38 – FR6075-N-01 – HUD Code 135
DRC # 39 – FR6075-N-01 – HUD Code 136

DRC # 40 – FR6075-N-01 – HUD Code Updates MHCC 136
DRC # 41 – FR6075-N-01 – HUD Code 137
DRC # 42 – FR6075-N-01 – HUD Code Updates 137
DRC # 43 – FR6075-N-01 – HUD Code 137
DRC # 44 – FR6075-N-01 – HUD Code 138
DRC # 45 – FR6075-N-01 – HUD Code 138
DRC # 46 – FR6075-N-01 – HUD Code Updates MHCC 138
DRC # 47 – FR6075-N-01 – HUD Code 139
DRC # 48 – FR6075-N-01 – HUD Code Updates 139
DRC # 49 – FR6075-N-01 – HUD Code Updates 140
DRC # 50 – FR6075-N-01 – HUD Code 140
DRC # 51 – FR6075-N-01 – HUD Code 141
DRC # 52 – FR6075-N-01 – HUD Code 141
DRC # 53 – FR6075-N-01 – HUD Code 141
DRC # 54 – FR6075-N-01 – HUD Code 141
DRC # 55 – FR6075-N-01 – HUD Code 142
DRC # 56 – FR6075-N-01 – HUD Code 142
DRC # 57 – FR6075-N-01 – HUD Code 143
DRC # 58 – FR6075-N-01 – HUD Code 143
DRC # 59 – FR6075-N-01 – HUD Code 143
DRC # 60 – FR6075-N-01 – HUD Code 144
DRC # 61 – FR6075-N-01 – HUD Code 144
DRC # 62 – FR6075-N-01 – HUD Code 144
DRC # 63 – FR6075-N-01 – HUD Code 145
DRC # 64 – FR6075-N-01 – HUD Code 145
DRC # 65 – FR6075-N-01 – HUD Code 146
DRC # 66 – FR6075-N-01 – General 146
DRC # 67 – FR6075-N-01 – MHCSS 146
DRC # 68 – FR6075-N-01 – Standards 147
DRC # 69 – FR6075-N-01 – HUD Code 147
DRC # 70 – FR6075-N-01 – Standards 147
DRC # 71 – FR6075-N-01 – Standards 148
DRC # 72 – FR6075-N-01 – Standards 148
DRC # 73 – FR6075-N-01 – Standards 148
DRC # 74 – FR6075-N-01 – Standards 149
DRC # 75 – FR6075-N-01 – DOE Rule 149
DRC # 76 – FR6075-N-01 – DOE Rule 149
DRC # 77 – FR6075-N-01 – Guidance 150

DRC # 78 – FR6075-N-01 – Guidance 150
DRC # 79 – FR6075-N-01 – Guidance 151
DRC # 80 – FR6075-N-01 – Add-ons 151
DRC # 81 – FR6075-N-01 – Add-ons 151
DRC # 82 – FR6075-N-01 – Inspections 152
DRC # 83 – FR6075-N-01 – Inspections 152
DRC # 84 – FR6075-N-01 – Inspectors 153
DRC # 85 – FR6075-N-01 – Installers 153
DRC # 86 – FR6075-N-01 – On-site Rule Burdens 153
DRC # 87 – FR6075-N-01 – On-site Rule Burdens 154
DRC # 88 – FR6075-N-01 – On-site Rule Burdens 154
DRC # 89 – FR6075-N-01 – On-site Rule Burdens 154
DRC # 90 – FR6075-N-01 – On-site Rule Burdens 155
DRC # 91 – FR6075-N-01 – On-site Rule Burdens 155
DRC # 92 – FR6075-N-01 – On-site Rule Burdens 156
DRC # 93 – FR6075-N-01 – On-site Rule Burdens 156
DRC # 94 – FR6075-N-01 – On-site Rule Burdens 156
DRC # 95 – FR6075-N-01 – On-site Rule Burdens 156
DRC # 96 – FR6075-N-01 – On-site Rule Burdens 157
DRC # 97 – FR6075-N-01 – On-site Rule Burdens 157
DRC # 98 – FR6075-N-01 – On-site Rule Burdens 157
DRC # 99 – FR6075-N-01 – On-site Rule Burdens 158
DRC # 100 – FR6075-N-01 – On-site Rule Burdens 158
DRC # 101 – FR6075-N-01 – On-site Rule Benefits 158
DRC # 102 – FR6075-N-01 – Installation Manual 159
DRC # 103 – FR6075-N-01 – Installation Manual 159
DRC # 104 – FR6075-N-01 – Installation Manual 160
DRC # 105 – FR6075-N-01 – Installation Manual 160
DRC # 106 – FR6075-N-01 – Installation Manual 160
DRC # 107 – FR6075-N-01 – Installation Manual 161
DRC # 108 – FR6075-N-01 – Affordability 161
DRC # 109 – FR6075-N-01 – HUD Code 161
DRC # 110 – FR6075-N-01 – HUD Code 162
DRC # 111 – FR6075-N-01 – HUD Code 162
DRC # 112 – FR6075-N-01 – HUD Code 163
DRC # 113 – FR6075-N-01 – HUD Code 163
DRC # 114 – FR6075-N-01 – DOE Rule 163
DRC # 115 – FR6075-N-01 – Engineering Certification 164

DRC # 116 – FR6075-N-01 – Standards 164
DRC # 117 – FR6075-N-01 – States 164
DRC # 118 – FR6075-N-01 – On-site Rule Burdens 165
DRC # 119 – FR6075-N-01 – Carport/Add-on Guidance 165
DRC # 120 – FR6075-N-01 – Carport/Add-on Guidance 166
DRC # 121 – FR6075-N-01 – Carport/Add-on Guidance 167
DRC # 122 – FR6075-N-01 – Carports Garages 167
DRC # 123 – FR6075-N-01 – Standards 168
DRC # 124 – FR6075-N-01 – Standards 168
DRC # 125 – FR6075-N-01 – Carport/Add-on Guidance 169
DRC # 126 – FR6075-N-01 – Carport/Add-on Guidance 169
DRC # 127 – FR6075-N-01 – AC Letters 170
DRC # 128 – FR6075-N-01 – AC Letters 170
DRC # 129 – FR6075-N-01 – AC Letters 170
DRC # 130 – FR6075-N-01 – Pro-preemption 171
DRC # 131 – FR6075-N-01 – Pro-preemption 171
DRC # 132 – FR6075-N-01 – Preemption Guidance 172
DRC # 133 – FR6075-N-01 – Pro-preemption 173
DRC # 134 – FR6075-N-01 – Pro-preemption 173
DRC # 135 – FR6075-N-01 – Anti-preemption 174
DRC # 136 – FR6075-N-01 – Pro-preemption 174
DRC # 137 – FR6075-N-01 – Preemption Guidance 175
DRC # 138 – FR6075-N-01 – Preemption Guidance 175
DRC # 139 – FR6075-N-01 – Subpart I Burdens 175
DRC # 140 – FR6075-N-01 – Subpart I Burdens 176
DRC # 141 – FR6075-N-01 – Subpart I Burdens 176
DRC # 142 – FR6075-N-01 – Subpart I Burdens 176
DRC # 143 – FR6075-N-01 – Enforcement 177
DRC # 144 – FR6075-N-01 – Enforcement 177
DRC # 145 – FR6075-N-01 – Enforcement 177
DRC # 146 – FR6075-N-01 – Enforcement States 178
DRC # 147 – FR6075-N-01 – Enforcement 178
DRC # 148 – FR6075-N-01 – Enforcement 179
DRC # 149 – FR6075-N-01 – Inspections 179
DRC # 150 – FR6075-N-01 – Frost-free 179
DRC # 151 – FR6075-N-01 – Frost-free 180
DRC # 152 – FR6075-N-01 – Frost-free 180
DRC # 153 – FR6075-N-01 – Frost-free 180

DRC # 154 – FR6075-N-01 – Frost-free 181
DRC # 155 – FR6075-N-01 – Soil 181
DRC # 156 – FR6075-N-01 – Frost-free 181
DRC # 157 – FR6075-N-01 – Frost-free 182
DRC # 158 – FR6075-N-01 – Frost-free 182
DRC # 159 – FR6075-N-01 – Foundation Burdens 182
DRC # 160 – FR6075-N-01 – Soil 183
DRC # 161 – FR6075-N-01 – Installation systems 183
DRC # 162 – FR6075-N-01 – Foundation Burdens 183
DRC # 163 – FR6075-N-01 – Foundation Burdens 184
DRC # 164 – FR6075-N-01 – Foundation Burdens 184
DRC # 165 – FR6075-N-01 – Foundation Burdens 184
DRC # 166 – FR6075-N-01 – Foundation Burdens 185
DRC # 167 – FR6075-N-01 – Foundation Burdens 185
DRC # 168 – FR6075-N-01 – Foundation Burdens 185
DRC # 169 – FR6075-N-01 – Frost-free 186
DRC # 170 – FR6075-N-01 – Frost-free 186
DRC # 171 – FR6075-N-01 – Frost-free 186
DRC # 172 – FR6075-N-01 – Frost-free 187
DRC # 173 – FR6075-N-01 – Frost-free 187
DRC # 174 – FR6075-N-01 – Frost-free 187
DRC # 175 – FR6075-N-01 – Frost-free 188
DRC # 176 – FR6075-N-01 – Frost-free 188
DRC # 177 – FR6075-N-01 – Frost-free 189
DRC # 178 – FR6075-N-01 – Frost-free 189
DRC # 179 – FR6075-N-01 – Frost-free 189
DRC # 180 – FR6075-N-01 – HUD Code 190
DRC # 181 – FR6075-N-01 – Soil 191
DRC # 182 – FR6075-N-01 – Soil 191
DRC # 183 – FR6075-N-01 – Foundations 191
DRC # 184 – FR6075-N-01 – MH Significance 192
DRC # 185 – FR6075-N-01 – MH Significance 192
DRC # 186 – FR6075-N-01 – MH Significance 192
DRC # 187 – FR6075-N-01 – MH Significance 193
DRC # 188 – FR6075-N-01 – MH Significance 193
DRC # 189 – FR6075-N-01 – MH Significance 194
DRC # 190 – FR6075-N-01 – MH Significance 194
DRC # 191 – FR6075-N-01 – MH Significance 194

DRC # 192 – FR6075-N-01 – MH Significance 195
DRC # 193 – FR6075-N-01 – MH Significance 195
DRC # 194 – FR6075-N-01 – MH Significance 195
DRC # 195 – FR6075-N-01 – MH Significance 195
DRC # 196 – FR6075-N-01 – MH Significance 196
DRC # 197 – FR6075-N-01 – MH Significance 196
DRC # 198 – FR6075-N-01 – Review 196
DRC # 199 – FR6075-N-01 – Review 197
DRC # 200 – FR6075-N-01 – Review 197
DRC # 201 – FR6075-N-01 – Review 198
DRC # 202 – FR6075-N-01 – Review 198
DRC # 203 – FR6075-N-01 – Review 198
DRC # 204 – FR6075-N-01 – Regulatory Overreach 199
DRC # 205 – FR6075-N-01 – Regulatory Overreach 199
DRC # 206 – FR6075-N-01 – Regulatory Overreach 199
DRC # 207 – FR6075-N-01 – Regulatory Overreach 200
DRC # 208 – FR6075-N-01 – Regulatory Overreach 200
DRC # 209 – FR6075-N-01 – Regulatory Overreach 201
DRC # 210 – FR6075-N-01 – Regulatory Burdens 201
DRC # 211 – FR6075-N-01 – Review 201
DRC # 212 – FR6075-N-01 – Regulatory Overreach and Guidance 202
DRC # 213 – FR6075-N-01 – Regulatory Burdens 202
DRC # 214 – FR6075-N-01 – Regulatory Burdens 202
DRC # 215 – FR6075-N-01 – Regulatory Overreach 203
DRC # 216 – FR6075-N-01 – Regulatory Burdens 203
DRC # 217 – FR6075-N-01 – Regulatory Burdens 203
DRC # 218 – FR6075-N-01 – Regulatory Burdens 204
DRC # 219 – FR6075-N-01 – Guidance 204
DRC # 220 – FR6075-N-01 – RV Rule 204
DRC # 221 – FR6075-N-01 – RV Rule 205
DRC # 222 – FR6075-N-01 – RV Rule 205
DRC # 223 – FR6075-N-01 – RV Rule 205
DRC # 224 – FR6075-N-01 – RV Rule 206
DRC # 225 – FR6075-N-01 – RV Rule 206
DRC # 226 – FR6075-N-01 – RV Rule 207
DRC # 227 – FR6075-N-01 – RV Rule and Standards 207
DRC # 228 – FR6075-N-01 – RV Rule 208
DRC # 229 – FR6075-N-01 – Financing 208

DRC # 230 – FR6075-N-01 – Financing 208
DRC # 231 – FR6075-N-01 – Financing 209
DRC # 232 – FR6075-N-01 – Financing 209
DRC # 233 – FR6075-N-01 – Financing 209
DRC # 234 – FR6075-N-01 – Financing 210
DRC # 235 – FR6075-N-01 – Financing 210
DRC # 236 – FR6075-N-01 – Financing 211
DRC # 237 – FR6075-N-01 – Financing 211
DRC # 238 – FR6075-N-01 – Financing 211
DRC # 239 – FR6075-N-01 – Financing 212
DRC # 240 – FR6075-N-01 – Financing 212
DRC # 241 – FR6075-N-01 – Financing 213
DRC # 242 – FR6075-N-01 – Financing 213
DRC # 243 – FR6075-N-01 – Financing 213
DRC # 244 – FR6075-N-01 – Financing 214
DRC # 245 – FR6075-N-01 – Financing 214
DRC # 246 – FR6075-N-01 – Financing 214
DRC # 247 – FR6075-N-01 – Formaldehyde 215
DRC # 248 – FR6075-N-01 – Formaldehyde 216
DRC # 249 – FR6075-N-01 – Dispute Resolution 216
DRC # 250 – FR6075-N-01 – Dispute Resolution 216
DRC # 251 – FR6075-N-01 – Dispute Resolution 217
DRC # 252 – FR6075-N-01 – Dispute Resolution 217
DRC # 253 – FR6075-N-01 – Dispute Resolution 217
DRC # 254 – FR6075-N-01 – OMHP Administration 218
DRC # 255 – FR6075-N-01 – OMHP Administration 218
DRC # 256 – FR6075-N-01 – OMHP Administration 219
DRC # 257 – FR6075-N-01 – OMHP Administration 219
DRC # 258 – FR6075-N-01 – OMHP Administration 219
DRC # 259 – FR6075-N-01 – MHIA Implementation 220
DRC # 260 – FR6075-N-01 – States 220
DRC # 261 – FR6075-N-01 – States 221
DRC # 262 – FR6075-N-01 – States 221
DRC # 263 – FR6075-N-01 – States 221
DRC # 264 – FR6075-N-01 – States 222
DRC # 265 – FR6075-N-01 – Standards for Review 222
DRC # 266 – FR6075-N-01 – Regulatory Benefits 223
DRC # 267 – FR6075-N-01 – Regulatory Benefits 223

DRC # 268 – FR6075-N-01 – Regulatory Benefits 223
DRC # 269 – FR6075-N-01 – Regulatory Benefits 224
DRC # 270 – FR6075-N-01 – Regulatory Benefits 224
DRC # 271 – FR6075-N-01 – Regulatory Benefits 225
DRC # 272 – FR6075-N-01 – Regulatory Benefits 225
DRC # 273 – FR6075-N-01 – Regulatory Benefits 226
DRC # 274 – FR6075-N-01 – Regulatory Benefits 226
DRC # 275 – FR6075-N-01 – Regulatory Benefits 226
DRC # 276 – FR6075-N-01 – Regulatory Benefits 227
DRC # 277 – FR6075-N-01 – Regulatory Benefits 227
DRC # 278 – FR6075-N-01 – Regulatory Benefits 228
DRC # 279 – FR6075-N-01 – Regulatory Benefits 228
DRC # 280 – FR6075-N-01 – Regulatory Benefits 228
DRC # 281 – FR6075-N-01 – MHCC 229
DRC # 282 – FR6075-N-01 – MHCC 229
DRC # 283 – FR6075-N-01 – MHCC 229
DRC # 284 – FR6075-N-01 – MHCC 230
DRC # 285 – FR6075-N-01 – MHCC 230
DRC # 286 – FR6075-N-01 – MHCC 231
DRC # 287 – FR6075-N-01 – Land 231
DRC # 288 – FR6075-N-01 – Land 231
DRC # 289 – FR6075-N-01 – Land 232
DRC # 290 – FR6075-N-01 – Land 232
DRC # 291 – FR6075-N-01 – Land 232
DRC # 292 – FR6075-N-01 – Land 232
DRC # 293 – FR6075-N-01 – Land 233
DRC # 294 – FR6075-N-01 – HUD Initiatives 233
DRC # 295 – FR6075-N-01 – HUD Initiatives 234
DRC # 296 – FR6075-N-01 – HUD Initiatives 234
DRC # 297 – FR6075-N-01 – DOE Rule 234
DRC # 298 – FR6075-N-01 – Deregulation Consequences 235
DRC # 299 – FR6075-N-01 – Permits 235
Appendix A - Submitter Cross Reference for FR 6075 Comments: 236

Proposed Change Status Summary 2018-2019 Cycle

LogID	Section	Action	Current Status
123	3280.511(a)(2) Comfort cooling certificate and information	Tabled	Pending MHCC Final Action
146	3285.304 (b)(2) Pier configuration		Received by Secretariat
147	3285.304 (c)(3) Pier configuration		Received by Secretariat
148	3286.411 (b) Certifying installation		Received by Secretariat
149	3280.609(c)(1)(iii) Water distribution systems		Received by Secretariat
150	3280.103(b) Light and ventilation		Received by Secretariat
151	3280.607(b)(5)(ii) Standpipes		Received by Secretariat (WITHDRAWN)
152	3280 Attic		Received by Secretariat
153	3282.416(a)(4) Oversight of notification and correction activities		Received by Secretariat
154	3280.607(b)(3)(i) Plumbing fixtures		Received by Secretariat
155	3280.504(a)(1) & 3280.504(d)(i) Ceiling vapor retarders		Received by Secretariat
156	3280.103(b)(5) & 3280.103(b)(6) Light and ventilation		Received by Secretariat
157	3280.109 Room requirements		Received by Secretariat
158	3280.309 Health Notice on formaldehyde emissions		Received by Secretariat
159	3280.1 Scope		Received by Secretariat
160	3280.2 Definitions		Received by Secretariat
161	3280.111 Toilet compartments		Received by Secretariat
162	3282.8(l) Applicability		Received by Secretariat
163	3282.202 Definitions		Received by Secretariat
164	3285.2, paragraph (b)(4) Manufacturer installation instructions		Received by Secretariat
165	3285.5 Definitions		Received by Secretariat
166	3285.5 Definitions		Received by Secretariat
167	3285.102 Installation of manufactured homes in flood hazard areas		Received by Secretariat
168	3285.102(d) Installation of manufactured homes in flood hazard areas		Received by Secretariat
169	3285.301(a) General		Received by Secretariat
170	3280 Energy efficiency and affordability of manufactured housing		Received by Secretariat
171	3280.607(b)(5)(ii) Standpipes		Received by Secretariat
172	3282.255(a) Completion of information card		Received by Secretariat
173	3280.105 Exit facilities; exterior doors		Received by Secretariat

LogID	Section	Action	Current Status
174	3280.203 and 3280.204 Fire protection and Kitchen Cabinet		Received by Secretariat
175	3280.707 Heat producing appliances		Received by Secretariat
176	3280.714 Appliances, cooling		Received by Secretariat
177	3280.305 and 3280.306 Structural design requirements and Windstorm protection		Received by Secretariat
178	3282.352 State exclusive IPIA functions		Received by Secretariat
179	3280.2, 3282.8, 3282.14, 3282.601, and 3285.903 Accessory structure		Received by Secretariat
180	3282.14(b) Alternative construction of manufactured homes		Received by Secretariat
181	3282.14(c)(3) Alternative construction of manufactured homes		Received by Secretariat
182	3282.7 Definitions; 3282 Subpart I Consumer Complaint Handling and Remedial Actions		Received by Secretariat
183	3280.711 Instructions		Received by Secretariat
184	3280.304 (b)(1) Materials & 3280.307 Resistance to elements and use		Received by Secretariat
185	3280.106 Exit facilities; egress windows and devices		Received by Secretariat
186	3280.6 Serial number		Received by Secretariat
187	3280.105 Exit facilities; exterior doors		Received by Secretariat
188	3280.607(b)(3)(i) Plumbing fixtures		Received by Secretariat
189	3280.113 Glass and glazed openings		Received by Secretariat
190	3286.803 State qualifying installation program & 3286.2 Applicability		Received by Secretariat
191	3280.404 Standard for egress windows and devices for use in manufactured homes		Received by Secretariat
192	3285.4(h)(2) Incorporation by reference (IBR)		Received by Secretariat
193	3280.4 Incorporation by Reference & 3280.801 Scope		Received by Secretariat
194	3282.7 (j), (x) and adding (lll). Definitions		Received by Secretariat
195	3282 Subpart M - On-Site Completion of Construction of Manufactured Homes		Received by Secretariat
196	3280.208 Requirements for foam plastic thermal insulating materials		Received by Secretariat
197	3282.404(a) Standard for egress windows and devices for use in manufactured homes		Received by Secretariat
198	3280.202 Definitions		Received by Secretariat
199	3280.4 Incorporation by reference		Received by Secretariat
200	3280.4 Incorporation by reference		Received by Secretariat
201	3280.304 Materials		Received by Secretariat
202	3280.403 Requirements for windows, sliding glass doors, and skylights		Received by Secretariat
203	3280.404 Standard for egress windows and devices for use in manufactured homes		Received by Secretariat

LogID	Section	Action	Current Status
204	3280.405 Standard for swinging exterior passage doors for use in manufactured homes		Received by Secretariat
205	3280.508 Heat loss, heat gain and cooling load calculations		Received by Secretariat
206	3280.403 Requirements for windows, sliding glass doors, and skylights		Received by Secretariat

Deregulation Comments from FR 6030-N-01 (HSG)

DRC #	Section	Action	Current Status
1	Regulatory		Received by Secretariat
2	75 CFR 5888		Received by Secretariat
3	HUD Statute		Received by Secretariat
4	24 CFR part 3282 Subpart M		Received by Secretariat
5	CFR part 3282 Subpart I		Received by Secretariat
6	24 CFR 3288		Received by Secretariat
7	Regulatory 42 USC 5404		Received by Secretariat
8	24 CFR 3280.309		Received by Secretariat
9	24 CFR part 3282.11		Received by Secretariat
10	Interpretive Bulletin		Received by Secretariat
11	24 CFR part 3286.803		Received by Secretariat
12	Manufactured Housing Requirements		Received by Secretariat
13	24 CFR Part 3286.803		Received by Secretariat
14	24 CFR part 3286.803		Received by Secretariat
15	24 CFR 3285.312		Received by Secretariat
16	Interpretive Bulletin		Received by Secretariat
17	24 CFR 3828 subpart M		Received by Secretariat
18	24 CFR part 3282 Subpart M		Received by Secretariat
19	Outdated Regulations		Received by Secretariat
20	42 U.S.C. 5412 et al		Received by Secretariat
21	Energy Independence and Security Act, Pub. L. 110–140 (2007)		Received by Secretariat
22	Formaldehyde Notices		Received by Secretariat
23	24 CFR part 3282		Received by Secretariat
24	24 CFR Part 3282		Received by Secretariat
25	42 USC 5403		Received by Secretariat
26	42 U.S.C. 5412 et al		Received by Secretariat
27	24 CFR 203.205		Received by Secretariat
28	24 CFR Part 3282 Subpart M		Received by Secretariat
29	24 CFR Sections 3286.2 and 3286.803		Received by Secretariat
30	Manufactured housing industry		Received by Secretariat
31	Interpretive Bulletin		Received by Secretariat
32	Regulatory		Received by Secretariat

Deregulation Comments from FR 6075-N-01

DRC #	Section	Action	Current Status
33	HUD Code		Received by Secretariat
34	HUD Code Updates MHCC		Received by Secretariat
35	HUD Code Updates MHCC		Received by Secretariat
36	HUD Code Updates		Received by Secretariat
37	HUD Code		Received by Secretariat
38	HUD Code		Received by Secretariat
39	HUD Code		Received by Secretariat
40	HUD Code Updates		Received by Secretariat
41	HUD Code		Received by Secretariat
42	HUD Code Updates		Received by Secretariat
43	HUD Code		Received by Secretariat
44	HUD Code		Received by Secretariat
45	HUD Code		Received by Secretariat
46	HUD Code Updates		Received by Secretariat
47	HUD Code		Received by Secretariat
48	HUD Code Updates		Received by Secretariat
49	HUD Code Updates		Received by Secretariat
50	HUD Code		Received by Secretariat
51	HUD Code		Received by Secretariat
52	HUD Code		Received by Secretariat
53	HUD Code		Received by Secretariat
54	HUD Code		Received by Secretariat
55	HUD Code		Received by Secretariat
56	HUD Code		Received by Secretariat
57	HUD Code		Received by Secretariat
58	HUD Code		Received by Secretariat
59	HUD Code		Received by Secretariat
60	HUD Code		Received by Secretariat
61	HUD Code		Received by Secretariat
62	HUD Code Updates		Received by Secretariat
63	HUD Code Updates		Received by Secretariat
64	HUD Code		Received by Secretariat
65	HUD Code		Received by Secretariat
66	General		Received by Secretariat
67	MHCSS		Received by Secretariat
68	Standards		Received by Secretariat
69	Standards		Received by Secretariat
70	Standards		Received by Secretariat
71	Standards		Received by Secretariat
72	Standards		Received by Secretariat
73	Standards		Received by Secretariat
74	Standards		Received by Secretariat
75	DOE Rule		Received by Secretariat
76	DOE Rule		Received by Secretariat
77	Guidance		Received by Secretariat
78	Guidance		Received by Secretariat

DRC #	Section	Action	Current Status
79	Guidance		Received by Secretariat
80	Add-ons		Received by Secretariat
81	Add-ons		Received by Secretariat
82	Inspections		Received by Secretariat
83	Inspections		Received by Secretariat
84	Inspectors		Received by Secretariat
85	Installers		Received by Secretariat
86	On-site Rule Burdens		Received by Secretariat
87	On-site Rule Burdens		Received by Secretariat
88	On-site Rule Burdens		Received by Secretariat
89	On-site Rule Burdens		Received by Secretariat
90	On-site Rule Benefits		Received by Secretariat
91	On-site Rule Benefits		Received by Secretariat
92	On-site Rule Burdens		Received by Secretariat
93	On-site Rule Burdens		Received by Secretariat
94	On-site Rule Burdens		Received by Secretariat
95	On-site Rule Burdens		Received by Secretariat
96	On-site Rule Burdens		Received by Secretariat
97	On-site Rule Burdens		Received by Secretariat
98	On-site Rule Burdens		Received by Secretariat
99	On-site Rule Burdens		Received by Secretariat
100	On-site Rule Burdens		Received by Secretariat
101	On-site Rule Benefits		Received by Secretariat
102	Installation Manual		Received by Secretariat
103	Installation Manual		Received by Secretariat
104	Installation Manual		Received by Secretariat
105	Installation Manual		Received by Secretariat
106	Installation Manual		Received by Secretariat
107	Installation Manual		Received by Secretariat
108	Affordability		Received by Secretariat
109	HUD Code		Received by Secretariat
110	HUD Code		Received by Secretariat
111	HUD Code		Received by Secretariat
112	HUD Code		Received by Secretariat
113	HUD Code		Received by Secretariat
114	DOE Rule		Received by Secretariat
115	Engineering Certification		Received by Secretariat
116	Standards		Received by Secretariat
117	States		Received by Secretariat
118	On-site Rule Burdens		Received by Secretariat
119	Carport/Add-on Guidance		Received by Secretariat
120	Carport/Add-on Guidance		Received by Secretariat
121	Carport/Add-on Guidance		Received by Secretariat
122	Carports Garages		Received by Secretariat
123	Standards		Received by Secretariat
124	Standards		Received by Secretariat
125	Carport/Add-on Guidance		Received by Secretariat
126	Carport/Add-on Guidance		Received by Secretariat
127	AC Letters		Received by Secretariat

DRC #	Section	Action	Current Status
128	AC Letters		Received by Secretariat
129	AC Letters		Received by Secretariat
130	Pro-preemption		Received by Secretariat
131	Pro-preemption		Received by Secretariat
132	Preemption Guidance		Received by Secretariat
133	Pro-preemption		Received by Secretariat
134	Pro-preemption		Received by Secretariat
135	Anti-preemption		Received by Secretariat
136	Pro-preemption		Received by Secretariat
137	Preemption Guidance		Received by Secretariat
138	Preemption Guidance		Received by Secretariat
139	Subpart I Burdens		Received by Secretariat
140	Subpart I Burdens		Received by Secretariat
141	Subpart I Burdens		Received by Secretariat
142	Subpart I Burdens		Received by Secretariat
143	Enforcement		Received by Secretariat
144	Enforcement		Received by Secretariat
145	Enforcement		Received by Secretariat
146	Enforcement States		Received by Secretariat
147	Enforcement		Received by Secretariat
148	Enforcement		Received by Secretariat
149	Inspections		Received by Secretariat
150	Frost-free		Received by Secretariat
151	Frost-free		Received by Secretariat
152	Frost-free		Received by Secretariat
153	Frost-free		Received by Secretariat
154	Frost-free		Received by Secretariat
155	Soil		Received by Secretariat
156	Frost-free		Received by Secretariat
157	Frost-free		Received by Secretariat
158	Frost-free		Received by Secretariat
159	Foundation Burdens		Received by Secretariat
160	Soil		Received by Secretariat
161	Installation systems		Received by Secretariat
162	Foundation Burdens		Received by Secretariat
163	Foundation Burdens		Received by Secretariat
164	Foundation Burdens		Received by Secretariat
165	Foundation Burdens		Received by Secretariat
166	Foundation Burdens		Received by Secretariat
167	Foundation Burdens		Received by Secretariat
168	Foundation Burdens		Received by Secretariat
169	Frost-free		Received by Secretariat
170	Frost-free		Received by Secretariat
171	Frost-free		Received by Secretariat
172	Frost-free		Received by Secretariat
173	Frost-free		Received by Secretariat
174	Frost-free		Received by Secretariat
175	Frost-free		Received by Secretariat
176	Frost-free		Received by Secretariat

DRC #	Section	Action	Current Status
177	Frost-free		Received by Secretariat
178	Frost-free		Received by Secretariat
179	Frost-free		Received by Secretariat
180	HUD Code		Received by Secretariat
181	Soil		Received by Secretariat
182	Soil		Received by Secretariat
183	Foundations		Received by Secretariat
184	MH Significance		Received by Secretariat
185	MH Significance		Received by Secretariat
186	MH Significance		Received by Secretariat
187	MH Significance		Received by Secretariat
188	MH Significance		Received by Secretariat
189	MH Significance		Received by Secretariat
190	MH Significance		Received by Secretariat
191	MH Significance		Received by Secretariat
192	MH Significance		Received by Secretariat
193	MH Significance		Received by Secretariat
194	MH Significance		Received by Secretariat
195	MH Significance		Received by Secretariat
196	MH Significance		Received by Secretariat
197	MH Significance		Received by Secretariat
198	Review		Received by Secretariat
199	Review		Received by Secretariat
200	Review		Received by Secretariat
201	Review		Received by Secretariat
202	Review		Received by Secretariat
203	Review		Received by Secretariat
204	Regulatory Overreach		Received by Secretariat
205	Regulatory Overreach		Received by Secretariat
206	Regulatory Overreach		Received by Secretariat
207	Regulatory Overreach		Received by Secretariat
208	Regulatory Overreach		Received by Secretariat
209	Regulatory Overreach		Received by Secretariat
210	Regulatory Burdens		Received by Secretariat
211	Review		Received by Secretariat
212	Regulatory Overreach Guidance		Received by Secretariat
213	Regulatory Burdens		Received by Secretariat
214	Regulatory Burdens		Received by Secretariat
215	Regulatory Overreach		Received by Secretariat
216	Regulatory Burdens		Received by Secretariat
217	Regulatory Burdens		Received by Secretariat
218	Regulatory Burdens		Received by Secretariat
219	Guidance		Received by Secretariat
220	RV Rule		Received by Secretariat
221	RV Rule		Received by Secretariat
222	RV Rule		Received by Secretariat
223	RV Rule		Received by Secretariat
224	RV Rule		Received by Secretariat
225	RV Rule		Received by Secretariat

DRC #	Section	Action	Current Status
226	RV Rule		Received by Secretariat
227	RV Rule Standards		Received by Secretariat
228	RV Rule		Received by Secretariat
229	Financing		Received by Secretariat
230	Financing		Received by Secretariat
231	Financing		Received by Secretariat
232	Financing		Received by Secretariat
233	Financing		Received by Secretariat
234	Financing		Received by Secretariat
235	Financing		Received by Secretariat
236	Financing		Received by Secretariat
237	Financing		Received by Secretariat
238	Financing		Received by Secretariat
239	Financing		Received by Secretariat
240	Financing		Received by Secretariat
241	Financing		Received by Secretariat
242	Financing		Received by Secretariat
243	Financing		Received by Secretariat
244	Financing		Received by Secretariat
245	Financing		Received by Secretariat
246	Financing		Received by Secretariat
247	Formaldehyde		Received by Secretariat
248	Formaldehyde		Received by Secretariat
249	Dispute Resolution		Received by Secretariat
250	Dispute Resolution		Received by Secretariat
251	Dispute Resolution		Received by Secretariat
252	Dispute Resolution		Received by Secretariat
253	Dispute Resolution		Received by Secretariat
254	OMHP Administration		Received by Secretariat
255	OMHP Administration		Received by Secretariat
256	OMHP Administration		Received by Secretariat
257	OMHP Administration		Received by Secretariat
258	OMHP Administration		Received by Secretariat
259	MHIA Implementation		Received by Secretariat
260	States		Received by Secretariat
261	States		Received by Secretariat
262	States		Received by Secretariat
263	States		Received by Secretariat
264	States		Received by Secretariat
265	Standards for Review		Received by Secretariat
266	Regulatory Benefits		Received by Secretariat
267	Regulatory Benefits		Received by Secretariat
268	Regulatory Benefits		Received by Secretariat
269	Regulatory Benefits		Received by Secretariat
270	Regulatory Benefits		Received by Secretariat
271	Regulatory Benefits		Received by Secretariat
272	Regulatory Benefits		Received by Secretariat
273	Regulatory Benefits		Received by Secretariat
274	Regulatory Benefits		Received by Secretariat

DRC #	Section	Action	Current Status
275	Regulatory Benefits		Received by Secretariat
276	Regulatory Benefits		Received by Secretariat
277	Regulatory Updates		Received by Secretariat
278	Regulatory Benefits		Received by Secretariat
279	Regulatory Benefits		Received by Secretariat
280	Regulatory Benefits		Received by Secretariat
281	MHCC		Received by Secretariat
282	MHCC		Received by Secretariat
283	MHCC		Received by Secretariat
284	MHCC		Received by Secretariat
285	MHCC		Received by Secretariat
286	MHCC		Received by Secretariat
287	Land		Received by Secretariat
288	Land		Received by Secretariat
289	Land		Received by Secretariat
290	Land		Received by Secretariat
291	Land		Received by Secretariat
292	Land		Received by Secretariat
293	Land		Received by Secretariat
294	HUD Initiatives		Received by Secretariat
295	HUD Initiatives		Received by Secretariat
296	HUD Initiatives		Received by Secretariat
297	DOE Rule		Received by Secretariat
298	Deregulation Consequences		Received by Secretariat
299	Permits		Received by Secretariat

Proposed Changes from Previous Cycles

Log 123 - § 3280.511(a)(2) Comfort cooling certificate and information	Date: 12/31/2014
Submitter:	Gary Clark, Goodman Global, Inc.
Requested Action:	New Text
Proposed Change:	*Alternative 2.* For each home suitable for a central air cooling system, the manufacturer shall provide the following statement: "This air distribution system of this home is suitable for the installation of a central air conditioning system." Example Alternate 2 COMFORT COOLING CERTIFICATE Manufactured Home Manufacturer Plant Location Manufactured Home Model This air distribution system of this home is suitable for the installation of central air conditioning. The supply air distribution system installed in this home is sized for Manufactured Home Central Air Conditioning System of up to ___ B.T.U./Hr. rated capacity which are certified in accordance with the appropriate Air Conditioning and Refrigeration Institute Standards. When the air circulators of such air conditioners are rated at 0.3 inch water column static pressure or greater for the cooling air delivered to the manufactured home supply air duct system. Information necessary to calculate cooling loads at various locations and orientations is provided in the special comfort cooling information provided with this manufactured home.
Reason:	The "Comfort Cooling Certificate" refers to static of 0.3 in.w.c for a given capacity. Instead, the certificate should refer to static at a nominal airflow in CFM. The MHCC should discuss this section further and consider implementing changes to this section.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Pending MHCC Final Action
Log History:	**10/25/2016 –** MHCC Motion: Table until next meeting **1/19/2016** – MHCC Motion: Table until next meeting. **8/19/2015** – MHCC Motion: Table until next meeting.

Proposed Changes 2018-2019 Cycle

Log 146 - § 3285.304 (b)(2) Pier configuration	Date: 10/12/2016
Submitter:	Michael Henretty, SEBA Professional Services, LLC.
Requested Action:	Revise Text
Proposed Change:	(2) Caps must be solid concrete or masonry at least 4 inches in nominal thickness~~, or hardboard~~ hardwood or pressure treated lumber at least 2 inches nominal in thickness; or be corrosion-protected minimum one-half inch thick steel; or be of other listed materials.
Reason:	Hardboard is defined as "stiff board made of compressed and treated wood pulp" that can expand when it is in contact with moisture. The intended wood type is Hardwood, which is a type of lumber (Oak, Maple, Hickory, etc.) Pressure treated lumber is added to help reduce cost and increase availability. In many state codes pressure treated lumber is already allowed. Additionally, it is normal in IRC construction for sill plates and any wood bearing on concrete or blocks. Pressure treated lumber is already allowed to be used for piers in 24 CFR part 3285.303.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Will reduce cost and increase material options.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 147 - § 3285.304 (c)(3) Pier configuration	Date: 10/12/2016
Submitter:	Michael Henretty, SEBA Professional Services, LLC.
Requested Action:	Revise Text
Proposed Change:	(3) Hardwood <u>or pressure treated</u> plates no thicker than 2inches nominal in thickness or 2 inch or 4 inch nominal concrete block must be used to fill in any remaining vertical gaps. Language will also need to be added in Figure A to 3285.306 Typical Footing & Pier Design Single Concrete Block and Figure B to 3285.306(b) Typical Footing & Pier Installation, Double Concrete Block to be consistent with the change.
Reason:	Change us related to previous submission. Adding pressure treated lumber will decrease cost and increase available choices.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Adding pressure treated lumber will decrease cost and increase available choices.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 148 - § 3286.411 (b) Certifying installation	Date: 10/12/2016
Submitter:	Michael Henretty, SEBA Professional Services, LLC.
Requested Action:	Revise Text
Proposed Change:	(b) Recipients of certification. The installer must provide a signed copy of its certification to the retailer that contracted with the purchaser or lessee for the sale or lease of the home, to the purchaser or other person with whom the installer contracted for the installation work, and to the Department within 7 days of the completed inspection.
Reason:	The change will ensure that the required inspection certification form is filed within a reasonable time of the completed inspection and that the Department is properly notified.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	There is no additional cost as submission of the certification form is already required. Submission by facsimile or email has no cost, US mail may cost $.55 ($.47 for postage and $.08 for envelope).
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 149 - § 3280.609(c)(1)(iii)) Water distribution systems	Date: 11/23/2016
Submitter:	David Meunier, Arizona Department of Housing
Requested Action:	Revise Text
Proposed Change:	§3280.609 Water distribution systems. (c)Water heater safety devices— (1) Relief valves. (iii)Relief valves shall be provided with full-sized drains, with cross sectional areas equivalent to that of the relief valve outlet, which shall ~~be directed downward and~~ discharge ~~beneath~~ away from the home in a manner that does not cause personal injury or structural damage, will prevent water build-up under the home, and terminate at a point that is readily observable by the home's occupants. ~~the manufactured home.~~ Drain lines shall be of a material listed for hot water distribution and shall drain fully by gravity, shall not be trapped, and shall not have their outlets threaded. ~~, and the end of the drain shall be visible for inspection.~~
Reason:	Problem: 1. Inconsistency between the requirements of 3285 and 3280. The clear intent of 3285.203 is to eliminate the buildup of water beneath the home: "§3285.203 Site Drainage. (a) Purpose. .....prevent water build-up under the home..... (b) .....remove any water that may collect under the home. (c) All drainage must be diverted away from home.....drain water away from the structure..... " Terminating the relief valve drain beneath the home is contrary to the intent of 3285.203. 2. The water heater relief valve is a safety device. Under normal conditions there will be no discharge from the relief valve. If the relief valve is discharging water a problem exists and must be addressed. The termination of the relief valve must be readily visible to the home's occupants, they need to see the water coming out so they know they have a problem. Terminating a relief valve beneath a home, especially a skirted or pit set home, make ready observation very difficult if not impossible.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 150 - § 3280.103(b) Light and ventilation	Date: 11/23/2016
Submitter:	David Meunier, Arizona Department of Housing
Requested Action:	Revise Text
Proposed Change:	§3280.103 Light and ventilation. (b) Whole-house ventilation. Each manufactured home must be provided with whole-house ventilation having a minimum capacity of 0.035 $ft^3/min/ft^2$ of interior floor space or its hourly average equivalent. This ventilation capacity must be in addition to any openable window area. In no case shall the installed ventilation capacity of the system be less than 50 cfm ~~nor more than 90 cfm~~.
Reason:	Problem: Administrative burden The establishment of a maximum ventilation capacity of 90 cfm requires homes greater than 2571 sq.ft. to be constructed under the Alternate Construction (3282.14) provision in order to meet the minimum ventilation requirements. Creating the AC request, reviewing and approving, monitoring and reporting imposes a burden on HUD, the manufacturer, the DAPIA and the IPIA. HUD has routinely approved exceeding the maximum 90 cfm requirement for many years with no apparent ill impact on homeowners. Implying that there is no real need for this maximum. Removing the 90 cfm maximum requirement will reduce the administrative burden on our limited resources by eliminating the need to implement the Alternate Construction process for this scenario.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The cost to HUD, the manufacturer, the DAPIA, and the IPIA for processing the requirements of Alternate Construction will be removed.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 151 - § 3280.607(b)(5)(ii) Standpipes - WITHDRAWN	Date: 1/11/2017
Submitter:	Joe Sadler, North Carolina Department of Insurance Manufactured Building Division
Requested Action:	Revise Text
Proposed Change:	(5) Clothes washing machines. (i) Clothes washing machines shall drain either into a properly vented trap, into a laundry tub tailpiece with watertight connections, into an open standpipe receptor, or over the rim of a laundry tub. (ii) Standpipes must be either 2 ~~1 1/2~~ inch diameter minimum nominal iron pipe size, 2 ~~1 1/2~~ inch diameter nominal brass tubing of not less than No. 20 Brown and Sharp gauge, or 2 ~~1 1/2~~ inch diameter approved plastic materials. Receptors must discharge into a vented trap or must be connected to a laundry tub appliance by means of an approved or listed directional fitting. Each standpipe must extend not less than 18 inches or more than 42 inches above its trap and must terminate in an accessible location no lower than the top of the clothes washing machine. A removable, tight-fitting cap or plug must be installed on the standpipe when the clothes washer is not provided.
Reason:	Most if not all washing machine manufacturers require a 2" minimum standpipe. The IRC also requires a 2" waste receptor for washing machines. With today's high capacity washers there have been instances were the flow from the washing machine pump overflows the standpipe and causes damage to the wall and floors in the utility or other areas.
Substantiating Documents:	Yes
Additional Cost:	Unknown
Cost Benefit Explanation:	The cost to change from an 1 1/2 inch to 2 inch would require no more than 6 feet of pipe and trap. The cost would be less than $25.00 for construction. The cost to change DAPIA drawings should also be minimal. The change would however be offset by fewer warranty claims and cost of inspection by manufacturers, especially if there is damage to the wall, floors and other components of the manufactured home.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	WITHDRAWN
Log History:	WITHDRAWN by submitter

Log 152 - § 3280 Attic		Date: 1/11/2017
Submitter:	Charles Davis, Davis Consulting	
Requested Action:	New Text	
Proposed Change:	Add: All manufactured homes shall provide attic access.	
Reason:	Having an attic access installed by the manufacturer will eliminate the necessity of doing so by the consumer who does not know what damage may be done when cutting a hole in the ceiling!	
Substantiating Documents:	No	
Additional Cost:	Yes	
Cost Benefit Explanation:	The benefit of making this modification is to remedy the obvious, "cutting corners" to be more competitive, objective used originally. I am sure that many buyers of manufactured homes have had to cut their own access doors in their attics for electrical or plumbing repairs or modifications. Or as in my case to trap a varmint that has invaded my attic!	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	Received by Secretariat	
Log History:		

Log 153 - § 3282.416(a)(4) Oversight of notification and correction activities	Date: 2/23/2017
Submitter:	David Meunier, Arizona Department of Housing
Requested Action:	Revise Text
Proposed Change:	§3282.416 Oversight of notification and correction activities. (a) *IPIA responsibilities*. The IPIA in each manufacturing plant must: (4) Conduct, at least ~~monthly~~ once per calendar quarter, a review the manufacturer's service records of determinations under §3282.404 and take appropriate action in accordance with §§3282.362(c)and 3282.364.
Reason:	Problem 1. Current required frequency of service record review creates excessive burden on IPIA and Manufacturer personnel resources. Problem 2. Current requirement of service record review creates additional expense for the Manufacturer by requiring an invoiced IPIA activity that was not required before the implementation of the regulation.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Reducing the required frequency of invoiced IPIA activity will reduce expense for the manufacturer. The current regulation requires twelve invoiced IPIA events per manufacturer, per year. The revision would reduce this to four invoiced IPIA events per manufacturer, per year.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 154 - § 3280.607(b)(3)(i) Plumbing fixtures	Date: 3/13/2017
Submitter:	David Meunier, Arizona Department of Housing
Requested Action:	Revise Text
Proposed Change:	§3280.607 Plumbing fixtures. b) Fixtures (3) Shower compartment. (i) Each compartment stall shall be provided with an approved watertight receptor with sides and back extending at least 1 inch above the finished dam or threshold. In no case shall the depth of a shower receptor be less than 2 inches or more than 9 inches measured from the top of the finished dam or threshold to the top of the drain. The wall area shall be constructed of smooth, noncorrosive, and nonabsorbent waterproof materials to a height not less than 6 feet above the bathroom floor level. Such walls shall form a watertight joint with each other and with the bathtub, receptor or shower floor. The floor of the compartment shall slope uniformly to the drain at not less than one-fourth nor more than one-half inch per foot. <u>Exception:</u> <u>Wheelchair-accessible showers may be installed. Wheelchair-accessible showers shall be installed in accordance with ANSI A-117 guidelines for each shower location where the finished dam or threshold is less than two inches above the top of the drain. The shower enclosure and compartment shall comply in all other respects to §3280.607(b)(3) of the Standards. The doorway to the bathroom containing a wheelchair-accessible shower shall have a minimum clear opening of 32 inches with the door open 90 degrees. Any structural modifications will be DAPIA approved including any structural changes to the floor or for a grab bar, which will require reinforcement and be in conformance with ANSI Al 17 .1 and ASTM F446.</u>
Reason:	Administrative burden. The exclusion of wheelchair accessible showers from the regulations requires the manufacturer to acquire an Alternate Construction letter to meet the request for wheelchair accessibility by homeowners. Creating the AC request, reviewing and approving, monitoring and reporting imposes a burden on HUD, the manufacturer, the DAPIA and the IPIA. HUD has routinely approved the installation of wheelchair accessible showers for many years with no apparent ill impact on homeowners. Implying that there is no real need to exclude them from the Standard. Including an exception to allow the installation of wheelchair accessible showers will reduce the administrative burden on the limited resources of the manufacturer, HUD, DAPIAs and IPIAs, by eliminating the need to implement the Alternate Construction process for this scenario.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The cost to HUD, the manufacturer, the DAPIA, and the IPIA for processing the requirements of Alternate Construction will be removed.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 155 - § 3280.504(a)(1) & 3280.504(d)(i) Ceiling vapor retarders	Date: 10/5/2017
Submitter:	John Weldy, Clayton Homes
Requested Action:	New Text
Proposed Change:	3280.504(a)(1)In Uo Value Zones 2 and 3, ceilings shall have a vapor retarder with a permanence of not greater than 1 perm (as measured by ASTM E-96-93 Standard Test Methods for Water Vapor Transmission of Materials) installed on the living space side of the roof cavity. <u>Exception: A ceiling vapor retarder is not required when attic or roof is ventilated in accordance with 3280.504(d)(i)</u>
Reason:	Proposal adds same benefit of utilizing attic ventilation to eliminate requirement for ceiling vapor retarder which residential housing built under the International Residential Code (IRC) has benefited from for many years. Manufactured homes today are built with the same ceiling drywall and textured finishes as site built homes. Applying a ceiling vapor retard to typical ceiling construction is time consuming and difficult which adds unnecessary cost burden to homes built under the Manufactured Home Construction and Safety Standards (MHCSS) when compared to home built under the prevailing national residential codes adopted by state and local authorities. Manufactured homes are unduly burdened by the ceiling vapor retarder requirement and the code should be revised to allow the same option to utilize attic ventilation to eliminate the need for ceiling vapor retarder. Substantiation: The International Residential Code (IRC) does not require a ceiling vapor retarder but rather allows the required net free ventilating area in attics to be reduced from 1/150 to 1/300 of the area of vented space when either a vapor retarder is installed on the ceiling or between 50% and 80% of required ventilation area is provided by ventilators located in the upper portion of the attic (see attached IRC* section R806.2). 24CFR3280.504(d)(i) requires a minimum free ventilation area of 1/300 of the attic area and requires between 50% to 60% of total required be in upper portion of the roof. Therefore, a ceiling vapor retarder is not required per the IRC for homes constructed in conformance with the Manufactured Home Construction and Safety Standards (MHCSS). The proposal eliminates the extra regulation burden contained within the MHCSS and better aligns it with the prevailing national residential code. * The 2009 IRC has been used as reference document but the prevision continues throughout the newest versions of the IRC.
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	There is no cost increase associated with this proposal as it provides as it adds an alternative option.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 156 - § 3280.103(b)(5) & 3280.103(b)(6) Light and ventilation	Date: 11/20/2017
Submitter:	John Weldy, Clayton Homes
Requested Action:	Revise Text
Proposed Change:	3280.103(b)(5) A whole-house ventilation label must be attached to the whole-house ventilation control, must be permanent, and must state: "WHOLE-HOUSE VENTILATION"~~.~~, except label is not required on systems which are integral with home's heating and cooling system. 3280.103(b)(6) Instructions for correctly operating and maintaining whole-house ventilation systems must be included with the homeowner's manual. The instructions must encourage occupants to operate these systems whenever the home is occupied, and must refer to the ~~labeled~~ whole-house ventilation control.
Reason:	Site built homes are not burdened with similar labeling regulation and therefore heating and cooling controls and thermostats typically are not labeled with a "whole-house ventilation" label. Current regulation forces manufactured home builders to obtain specially labeled thermostats or to physically apply labels to listed thermostats and controls. Homeowners are increasingly seeking to control their HVAC systems through smart thermostats such as Nest, Ecobee, and others which use electronic menus and tablets to interface system controls. Proposal would allow use of standard readily available HVAC controls and smart thermostats resulting in expanded consumer options and allow for innovative control technologies which have been proven effective in reducing energy cost. Proposal will eliminate extra regulator burden on Manufactured Homes concerning HVAC control labeling. Substantiation: The International Residential Code (IRC) does not contain a similar mandate for whole-house ventilation controls to be labeled and therefore current regulation is excessively burdensome to manufactured housing. Section 3280.103(b)(6) continues to require the homeowner manual to include instructions on how to operate the whole house ventilation system. Manufacturers of controls which are integral with heating and cooling system provide operating manuals which explain operation of the integral ventilation system. A label on such integral HVAC controls is not necessary to ensure proper operation and therefore it is appropriate to modify this section to eliminate the labeling requirement for these systems.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Proposal will not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 157 - § 3280.109 Room requirements	Date: 11/20/2017
Submitter:	John Weldy, Clayton Homes
Requested Action:	Revise Text
Proposed Change:	3280.109(a) Every manufactured home shall have at least one living area with not less than ~~150~~ 70 sq. ft. of gross floor area. 3280.109(b) Rooms designed for sleeping purposes shall have a minimum gross square foot floor area as follows: 3280.109(b)(1) All bedrooms shall have at least 50 sq. ft. of floor area. 3280.109(b(2) At least one Bedroom~~s designed for two or more people~~ shall have 70 sq. ft. of gross floor area. ~~plus 50 sq. ft. for each person in excess of two.~~
Reason:	Reason: Proponents of minimalist living have advocated smaller dwellings to reduce environmental impact and provide for lower living costs through reduced mortgage and maintenance expenses. These dwellings are intended to allow for a minimalist lifestyle that doesn't demand large volumes of living space. Proponents of this change reasoned that consumers make a purposeful and informed decision as to the appropriateness of the housing they choose to live in and that the code should not place arbitrary restrictions on room size that have no demonstrable life-safety benefit. Although the change will not impact typical residential construction, it will accommodate alternatives for very small dwellings that would previously not be allowed under the regulations. It may also encourage greater acceptance of and compliance with the Federal Manufactured Home Construction and Safety Standards by those pursuing a minimalist lifestyle. The proposed language reflects changes made within section R304.2 of the 2015 International Residential Code (IRC). The standard sets minimum requirements for a healthy interior living environment, including provisions for room size, ceiling height, light, ventilation, and heating. The code has long provided a minimum room area of 120 square feet for at least one habitable room. The requirement for one habitable room with a minimum floor area of 120 square feet has been removed from the 2015 IRC which now applies the 70-square-foot minimum area to all habitable rooms except for kitchen, as the smallest acceptable size for occupants to move about and use the habitable space as intended. The minimum area of 150 square feet was not based on scientific analysis or on identified safety hazards but was generally accepted by code users and in the marketplace. 2015 IRC change Source: http://media.iccsafe.org/news/eNews/2014v11n20/2015_irc_sigchanges_p46-7.pdf
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 158 - § 3280.309 Health Notice on formaldehyde emissions	Date: 11/20/2017
Submitter:	John Weldy, Clayton Homes
Requested Action:	Delete Text
Proposed Change:	~~3280.309(a) Each manufactured home shall have a Health Notice on formaldehyde emissions prominently displayed in a temporary manner in the kitchen (i.e., countertop or exposed cabinet face). The Notice shall read as follows:~~ ~~Important Health Notice~~ ~~Some of the building materials used in this home emit formaldehyde. Eye, nose, and throat irritation, headache, nausea, and a variety of asthma-like symptoms, including shortness of breath, have been reported as a result of formaldehyde exposure. Elderly persons and young children, as well as anyone with a history of asthma, allergies, or lung problems, may be at greater risk. Research is continuing on the possible long-term effects of exposure to formaldehyde.~~ ~~Reduced ventilation resulting from energy efficiency standards may allow formaldehyde and other contaminants to accumulate in the indoor air. Additional ventilation to dilute the indoor air may be obtained from a passive or mechanical ventilation system offered by the manufacturer. Consult your dealer for information about the ventilation options offered with this home.~~ ~~High indoor temperatures and humidity raise formaldehyde levels. When a home is to be located in areas subject to extreme summer temperatures, an air-conditioning system can be used to control indoor temperature levels. Check the comfort cooling certificate to determine if this home has been equipped or designed for the installation of an air-conditioning system.~~ ~~If you have any questions regarding the health effects of formaldehyde, consult your doctor or local health department.~~ ~~3280.309(b) The Notice shall be legible and typed using letters at least ¼ inch in size. The title shall be typed using letters at least ¾ inch in size.~~ ~~3280.309(c) The Notice shall not be removed by any party until the entire sales transaction has been completed (refer to part 3282--Manufactured Home Procedural and Enforcement Regulations for provisions regarding a sales transaction).~~ ~~3280.309(d) A copy of the Notice shall be included in the Consumer Manual (refer to part 3283—Manufactured Home Consumer Manual Requirements).~~
Reason:	Reason: Health Notice is no longer necessary with enactment of new Federal EPA formaldehyde regulations (Toxic Substances Control Act TSCA Title VI) which regulates formaldehyde emission standards in all composite wood and laminated products sold and used within the United States. Current regulation may unnecessarily raise manufactured home owner anxiety by misleading consumer to believe that their Manufactured Home contains unregulated materials which may result in higher formaldehyde emission levels than would be expected on comparable site built home. Substantiation: Federal EPA formaldehyde regulations (Toxic Substances Control Act TSCA Title VI) sets formaldehyde emission limits for all composite wood and laminated products sold and used within the United States. The EPA adds additional

	documentation and labeling burden to Manufactured Home Manufacturers by classifying them as “fabricators” within TSCA Title VI. Site builders, whom are not considered fabricators within TSCA, are not required to meet these extra burdens although site built homes contain the same materials produced with formaldehyde resin. Site built home builders are not required to provide a consumer health safety notice to home buyers and it unnecessary and discriminatory to continue to require MH builders to provide a health notice to consumers.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 159 - § 3280.1 Scope	Date: 11/21/2017
Submitter:	John Weldy, Clayton Homes
Requested Action:	Revise Text
Proposed Change:	Revise 3280.1 by removing "unit" as follows: 3280.1: This standard covers all equipment and installations in the design, construction, transportation, fire safety, plumbing, heat-producing and electrical systems of manufactured homes which are designed to be used as dwelling ~~units~~. This standard seeks to the maximum extent possible to establish performance requirements. In certain instances, however, the use of specific requirements is necessary.
Reason:	The term "Dwelling Unit" is not within the Statute (5402.6) and is only contained in section 3280.1 and 3280.2 of the standards. Deleting Unit form 3280.1 and adding definition of dwelling into 3280.2 will anchor standard to Statute since definition of Manufactured Home within both 5402.6 and 3280.2 uses the term "Dwelling" rather than "dwelling unit".
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 160 - § 3280.2 Definitions	Date: 11/21/2017
Submitter:	John Weldy, Clayton Homes
Requested Action:	New Text
Proposed Change:	Add definition of Dwelling, Revise definition of Dwelling unit, add definition of Grade Plane and story in 3280.2: *Dwelling.* Any building that contains one or two dwelling units used, intended, or designed to be built, used, rented, leased, let or hired out to be occupied, or that are occupied for living purposes which is not more than three stories above grade plane in height. *Dwelling Unit.* ~~means one or more habitable rooms which are designed to be occupied by one family~~ A single unit providing complete independent living facilities for one or more persons, including permanent provisions ~~with facilities~~ for living, sleeping, eating, cooking and sanitation ~~eating~~. Grade Plane. A reference plane representing the average of the finished ground level adjoining the building at all exterior walls. Where the finished ground level slopes away from the exterior walls, the reference plane shall be established by the lowest points within the area between the building and the lot line or, where the lot line is more than 6 feet from the building between the structure and a point 6 feet from the building. Story. That portion of a building included between the upper surface of a floor and the upper surface of the floor or roof next above.
Reason:	The term "Dwelling Unit" is not within the Statute (5402.6) and is only contained in section 3280.1 and 3280.2 of the standards. Adding definition of dwelling into 3280.2 will anchor standard to Statute since definition of Manufactured Home within both 5402.6 and 3280.2 uses the term "Dwelling" rather than "dwelling unit". Definitions better aligns with scope and definitions as provided within the International Residential Code (IRC) (section R101.2 & R202). Story and Grade Plane as defined within the IRC were introduced to provide clarity of story for walk out basement and two story applications. The laws regulating manufactured housing have failed to keep pace with dramatic changes in the manufactured housing industry. Modern manufactured housing has little in common with a trailer; instead, a manufactured home can be nearly indistinguishable from a traditional site-built house next door. Manufactured home units may be combined into clusters or stacks that include multiple stories, vaulted ceilings, and attached garages. Regulations first promulgated in 1976 by the U.S. Department of Housing and Urban Development require similar materials and construction standards as site-built housing, and the resulting life expectancy of a manufactured home is now the same as a comparable site-built model. About 75 percent of manufactured homes are located on land owned by the homeowner, and the average lot size for those homes is more than double the average for traditional site-built homes. (From The National conference of Commissioners on Uniform State Laws at http://www.uniformlaws.org/ActSummary.aspx?title=Manufactured%20Housing%20Act).
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	

MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 161 - § 3280.211 Toilet compartments	Date: 11/21/2017
Submitter:	John Weldy, Clayton Homes
Requested Action:	New Text
Proposed Change:	Add new section 3280.211 Dwelling Unit Separation as follows: 3280.211 Dwelling Unit Separation Requirements. Two-family dwelling units in two-family dwellings shall be separated from each other by wall and/or floor assemblies having not less than a 1-hour fire-resistance rating when tested in accordance with ASTM E 119. Fire-resistance-rated floor-ceiling and wall assemblies shall extend to and be tight against the exterior wall, and wall assemblies shall extend to the underside of the roof sheathing. Exceptions: A fire-resistance rating of ½ hour shall be permitted in buildings equipped throughout with an automatic sprinkler system installed in accordance with NFPA 13D. Wall assemblies need not extend through attic spaces where the ceiling is protected by not less than 5/8-inch Type X gypsum board, an attic draft stop constructed with at least 1/2-inch gypsum board or 3/8-inch wood structural panels is provided above and along the wall assembly separating the dwellings and the structural framing supporting the ceiling is protected by not less than ½-inch gypsum board or equivalent.
Reason:	Added language was brought from section R302.3 of the 2015 International Residential Code and is an important to introduce into the 3280 to address separation between dwelling units in two family dwelling. The laws regulating manufactured housing have failed to keep pace with dramatic changes in the manufactured housing industry. Modern manufactured housing has little in common with a trailer; instead, a manufactured home can be nearly indistinguishable from a traditional site-built house next door. Manufactured home units may be combined into clusters or stacks that include multiple stories, vaulted ceilings, and attached garages. Regulations first promulgated in 1976 by the U.S. Department of Housing and Urban Development require similar materials and construction standards as site-built housing, and the resulting life expectancy of a manufactured home is now the same as a comparable site-built model. About 75 percent of manufactured homes are located on land owned by the homeowner, and the average lot size for those homes is more than double the average for traditional site-built homes. (From The National conference of Commissioners on Uniform State Laws at http://www.uniformlaws.org/ActSummary.aspx?title=Manufactured%20Housing%20Act).
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 162 - § 3282.8(l) Applicability	Date: 11/21/2017
Submitter:	John Weldy, Clayton Homes
Requested Action:	Delete Text
Proposed Change:	Delete 3282.8 (l) in entirety as follows: ~~3282.8(l)~~ ~~Multifamily homes. Mobile homes designed and manufactured with more than one separate living unit are not covered by the standards and these regulations.~~
Reason:	The term "Dwelling Unit" is not within the Statute (5402.6) which defines Manufactured Home as "Dwelling" rather than "dwelling unit". Removing this section better aligns with scope and definitions as provided within the International Residential Code (section R101.2 & R202) that standard scope includes one and two family dwellings. The laws regulating manufactured housing have failed to keep pace with dramatic changes in the manufactured housing industry. Modern manufactured housing has little in common with a trailer; instead, a manufactured home can be nearly indistinguishable from a traditional site-built house next door. Manufactured home units may be combined into clusters or stacks that include multiple stories, vaulted ceilings, and attached garages. Regulations first promulgated in 1976 by the U.S. Department of Housing and Urban Development require similar materials and construction standards as site-built housing, and the resulting life expectancy of a manufactured home is now the same as a comparable site-built model. About 75 percent of manufactured homes are located on land owned by the homeowner, and the average lot size for those homes is more than double the average for traditional site-built homes. (From The National conference of Commissioners on Uniform State Laws at http://www.uniformlaws.org/ActSummary.aspx?title=Manufactured%20Housing%20Act).
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 163 - § 3282.202 Definitions	Date: 12/5/2017
Submitter:	Joe Sadler, North Carolina Department of Insurance Manufactured Building Division
Requested Action:	Revise Text
Proposed Change:	§3282.202 Primary inspection agency contracts. (a) Each manufacturer shall enter into a contract or other agreement with as many at least one Design Inspection Approval Primary Inspection Agencies (DAPIAs) as it wishes and with enough a sufficient number of Production Inspection Primary Inspection Agencies (IPIAs) to provide IPIA services for each manufacturing plant as set out in this subpart and in subpart H of this part. All Primary Inspection Agencies (PIAs) except for State exclusive IPIAs approved under 24 CFR § 3282.352, must send a copy of the statement of work from each contract or other agreement to provide DAPIA and IPIA services for each manufacturer to the Secretary and State Administrative Agency (SAA) in the State where the manufacturing plant is located within ten (10) days of execution of the contract or agreement. (b) In return for the services provided by the DAPIAs and IPIAs, each manufacturer shall pay such reasonable fees as are agreed upon between the manufacturer and the primary inspection agency or, in the case of a State acting as an exclusive IPIA under §~~3282.3~~ 3282.352 such fees as may be established by the State. (c) In the event that a manufacturer terminates its relationship with the existing IPIA at a plant and enters into a contract or agreement with a different IPIA: (1) Within ten (10) days of the notice of the transfer of services, the outgoing IPIA must transfer to the Department a written notice of the transfer and must provide and explanation of the circumstances resulting in the transfer (2) In Addition to the written notice described above, the outgoing PIA must also provide the Department, the manufacturer, SAA, and the incoming IPIA subsequently engaged by the manufacturer, with a status report of actions for which the incoming IPIA will assume the responsibility including but not limited to inspection findings from the outgoing IPIA performed within the last thirty (30) days, including any unresolved findings including but not limited to failures to conform, certification label control, red tags, areas needing increased frequency of inspection, Sub-Part I notification and correction campaigns, class searches with the IPIA concurrences, and any improvements or remedial actions needed by the manufacturer related to their quality assurance and quality control programs.
Reason:	The problem is that when there is a transfer of responsibilities for a manufacturer from one IPIA to another IPIA the transfer of information to the Department and the SAA where the manufacturer is located is not provided. We have had a situation where the manufacturer could not get a concurrence for an ongoing Sub-Part I Class determination from the outgoing IPIA that occurred during their tenure. Problems can occur due to contractual issues between the manufacturer and the outgoing IPIA causing a delay in the SAA finalizing specific class searches and determinations.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	There should be no cost changes since this is basically a transfer of information to enable the HUD and the SAA to carry out their duties.
Subcommittee Recommendation:	
MHCC Action:	

MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 164 - § 3285.2, paragraph (b)(4) Manufacturer installation instructions	Date: 12/16/2017
Submitter:	Gregory Wilson, Federal Emergency Management Agency
Requested Action:	Revise Text
Proposed Change:	**§ 3285.2 Manufacturer installation instructions.** No change to (a) No change to (b)(1), (2) or (3) (4)Foundation support and anchoring systems are designed for use in areas subject to freezing or for use in flood hazard areas ~~subject to flood damage~~ or high seismic risk; or *remainder unchanged*
Reason:	This proposal is editorial for consistency with the terms defined in 24 CFR Section 3285.5. The term "flood hazard area" is defined, while the term "area subject to flood damage" is not. This change corrects imprecise language.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Clarification of terms does not change the basic requirement.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 165 - § 3285.5 Definitions	Date: 12/16/2017
Submitter:	Gregory Wilson, Federal Emergency Management Agency
Requested Action:	Revise Text
Proposed Change:	**§ 3285.5 Incorporation by Reference (IBR). (partial)** (g) The materials listed below are available ~~for purchase~~ from the Federal Emergency Management Administration (FEMA),500 C Street, SW., Washington, DC 20472. www.fema.gov or 1-800-480-2520 (1) FEMA P-85/November 2009,Protecting Manufactured Homes from Floods and Other Hazards, 2009 or more recent edition ~~FEMA 85/September 1985, Manufactured Home Installation in Flood Hazard Areas, 1985~~, IBR approved for § 3285.102(d)(3). (2) [Reserved]
Reason:	This proposal is updates the title and date of FEMA's guidance publication on installation of manufactured homes. The phrase "or more recent" is proposed to avoid these regulations becoming out-of-sync with future updates. FEMA may revise FEMA P-85 in the next few years. Also see proposal to update the reference in 3285.102. The direct link to the publication is https://www.fema.gov/media-library/assets/documents/2574
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Proposal updated a guidance document.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 166 - § 3285.5 Definitions	Date: 12/16/2017
Submitter:	Gregory Wilson, Federal Emergency Management Agency
Requested Action:	Revise Text
Proposed Change:	*Lowest floor*. The lowest floor of the lowest enclosed area of a manufactured home. An unfinished or flood-resistant enclosure, used solely for vehicle parking, home access, or limited storage, must not be considered the lowest floor, provided the enclosed area is not constructed so as to render the home in violation of the flood-related provisions of this standard.
Reason:	This proposal is editorial for consistency with the term "lowest floor" defined in 44 CFR Section 59.1, which establishes definitions used for NFIP requirements for special flood hazard areas.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	No additional cost. Modifying the definition does not change how the term is used or the requirements applicable to the term.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 167 - § 3285.102 Installation of manufactured homes in flood hazard areas	Date: 12/16/2017
Submitter:	Gregory Wilson, Federal Emergency Management Agency
Requested Action:	Delete Text
Proposed Change:	No change to (a) and (b) (c)*Pre-installation considerations*. Prior to the initial installation of anew manufactured home, the installer is responsible for determining whether the manufactured home site lies wholly or partly within a ~~special~~ flood hazard area as shown on the LAHJ's Flood Insurance Rate Map, Flood Boundary and Floodway Map, or Flood Hazard Boundary Map, or if no LAHJ, in accordance with NFIP regulations. If so located, and before an installation method is agreed upon, the map and supporting studies adopted by the LAHJ must be used to determine the flood hazard zone and base flood elevation at the site. (d)*General elevation and foundation requirements—* (1)*Methods and practices*. Manufactured homes located wholly or partly within ~~special~~ flood hazard areas must be installed on foundations engineered to incorporate methods and practices that minimize flood damage during the base flood, in accordance with the requirements of the LAHJ, 44 CFR 60.3(a) through (e), and other provisions of 44 CFR referenced by those paragraphs.
Reason:	This proposal is editorial for consistency with the terms defined in 24 CFR Section 3285.5. The term "flood hazard area" is defined and includes the "special flood hazard area." Limiting the requirement to the special flood hazard area precludes the use of a locally adopted flood hazard map. This change corrects imprecise language.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	No additional cost. Clarification of terms does not change the basic requirement.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 168 - § 3285.102(d) Installation of manufactured homes in flood hazard areas	Date: 12/16/2017
Submitter:	Gregory Wilson, Federal Emergency Management Agency
Requested Action:	Revise Text
Proposed Change:	No change to (a), (b) and (c) No change to (d)(1) and (2) (3) Related guidance. Refer to FEMA P-85/November 2009 or more recent, Protecting Manufactured Homes from Flood and Other Hazards, 2009 ~~FEMA85/September 1985, Manufactured Home Installation in Flood Hazard Areas, 1985~~(incorporated by reference, see § 3285.4).
Reason:	This proposal updates the reference to of the guidance document published by the Federal Emergency Management Agency. The guidance, FEMA P-85, was updated in November 2009. The phrase "or more recent" is proposed to avoid these regulations becoming out-of-sync with future updates. FEMA may revise FEMA P-85 in the next few years. Also see proposal to revise the citation at 3285.4.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	No additional cost. Reference to newer related guidance does not change the basic requirements.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 169 - § 3285.301(a) General	Date: 12/16/2017
Submitter:	Gregory Wilson, Federal Emergency Management Agency
Requested Action:	Revise Text
Proposed Change:	(a)Foundations for manufactured home installations <u>and outside appliances</u> must be designed and constructed in accordance with this subpart and must be based on site conditions, home design features, and the loads the home was designed to withstand, as shown on the home's data plate. *remainder unchanged*
Reason:	This proposal makes the foundation requirement apply to platforms and other means to elevate outside appliances. 24 CFR Part 3285.102(d)(2) requires outside appliances to be anchored and elevated to or above the same elevation as the lowest elevation of the lowest floor of the home. This addition requires the platforms and pedestals elevating the equipment to resist design loads. This protects the outside appliances from the same level of risk as the foundation of homes. Post-flood damage observations performed by FEMA indicate that platforms and pedestals that are not designed to resist flood loads can fail under flooding conditions, damaging or destroying the equipment and possibly causing the equipment to become debris that can damage nearby foundations.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	No increase in cost because the NFIP, reflected in local floodplain management regulations, already require equipment to be installed elevated. In locations where equipment was not required to be elevated in accordance with those regulations, there may be a slight increase in initial construction/installation costs, but savings will accrue by avoided damage to equipment and its foundations.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 170 - § 3280 Energy efficiency and affordability of manufactured housing	Date: 12/19/2017
Submitter:	Robin Roy, Next Energy US
Requested Action:	Revise Text
Proposed Change:	The proposal is to improve energy efficiency and affordability of manufactured housing (MH) by updating the HUD MH construction and safety standards ("HUD Code"). In particular, the proposal is to incorporate the consensus recommendations of the MH Working Group ("MH Working Group") established by the U.S. Department of Energy. The MH Working Group was comprised of representatives of manufacturers and trade associations representing a substantial majority of the industry, equipment suppliers, environmental and efficiency advocates, consumer and homeowner advocates, and state agencies. It was formed and operated by DOE in accordance with the Federal Advisory Committee Act (FACA) and the Negotiated Rulemaking Act (NRA) with the purpose of identifying energy conservation standards for MH, taking into account the current HUD Code, the impact on purchase price, the impact on total life cycle construction and operating costs, and the most recent edition of the International Energy Conservation Code for site-built homes. The MH Working Group's consensus proposal is detailed in "Appliance Standards and Rulemaking Federal Advisory Committee Manufactured Housing Working Group Term Sheet" October 31, 2014. (That term sheet has been emailed to MHCC@HomeInnovation.com as part of this proposal to the MHCC.) The MH Working Group proposal represents a balanced suite of improvements to the current HUD Code and was developed after intensive deliberations. The MH Working Group considered public and HUD input, as well as detailed analyses provided by DOE and performed by Pacific Northwest National Laboratory and Navigant Consulting. The MH Working Group proposal includes the following elements: • A climate zone map that better reflects weather characteristics than the current HUD Code zones, while remaining simplified relative to the IECC-defined zones; • Updated thermal envelope requirements that reflect both the IECC and the unique attributes of MH construction; • Flexibility for manufacturers to meet the thermal envelope requirements using a choice of either a prescriptive path option or a performance path; and • Mandatory requirements related to improved air sealing; duct leakage and hot water pipe insulation that reflect both the IECC and the unique attributes of MH construction.
Reason:	This proposal addresses two problems: 1.Modernizes badly outdated energy provisions of the current HUD Code 2.Facilitates reduced regulatory burden on manufacturers 1. Updates badly outdated energy provisions of the current HUD Code The standards in the HUD Code are badly outdated with respect to energy efficiency, and as such fall short of the purpose of the National Manufactured Housing Construction and Safety Standards Act of 1974 (42USC5401 et seq) to establish home construction and safety standards that include "…cost-effective energy conservation performance standards designed to ensure the lowest total of construction and operating costs. (42USC5403(g). The energy-related provisions in the HUD Code were last substantially updated over 20 years ago. Notably, the International Energy Conservation Code, which is the model building code for site-built housing and is referenced by state government building codes, has been updated 5 times since 2000, and now delivers energy savings of some 50% relative to its earlier version. In support of the MH Working Group's deliberations,

	DOE analyzed the economic and energy impacts of the proposal, with the expert assistance of Pacific Northwest National Laboratory and of Navigant Consulting. Their analyses indicate that the Working Group recommendations would deliver energy savings of 20% to 35% relative to the current HUD Code. Further, DOE's analysis indicates that the recommendations would be highly economic, with total lifetime costs (including purchase costs, energy costs and maintenance) that are lower than a home that minimally meets the current HUD Code. The MH Working Group considered the vital affordability question of how to balance energy cost savings over time and higher first costs of construction. Addressing the importance of first cost affordability (and not just of minimizing the total life cycle costs), the MH Working Group did not recommend adoption of all cost-effective measures, but rather, a package of only measures that are the most economic. DOE's analysis indicates that recommended measures would increase first cost by $1000 to $3000 and would be repaid by energy savings within 5 to 10 years. 2. Reduce the risk of additional regulatory burden. The Energy Independence and Security Act (EISA) requires the Department of Energy to establish and enforce cost effective energy efficiency standards for MH (42 USC 17071 et seq). There is no requirement under EISA to harmonize those standards with the relevant provisions in the HUD Code. Updating the HUD Code would reduce or eliminate the opportunities for additional cost-effective measure that DOE would be required to establish and enforce. Accordingly, adopting this proposal would reduce the risk of additional regulatory burden being placed on manufacturers.
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	Detailed analyses of the economics, including cost-benefit analysis, manufacturer profitability analysis, and analyses of energy, purchase cost, financing and other aspects are included in DOE's "Technical Support Document for the U.S. Department of Energy's Notice of Proposed Rulemaking Establishing Energy Conservation Standards for Manufactured Housing" (June 2016), which is available at: https://www.regulations.gov/contentStreamer?documentId=EERE-2009-BT-BC-0021-0136&attachmentNumber=1&contentType=pdf . A detailed spreadsheet addressing life cycle costs is available here: https://www.regulations.gov/contentStreamer?documentId=EERE-2009-BT-BC-0021-0137&attachmentNumber=1&contentType=excel12mebook Both of these documents have been emailed to MHCC@HomeInnovation.com for MHCC consideration.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 171 - § 3280.607(b)(5)(ii) Standpipes	Date: 12/20/2017
Submitter:	Joe Sadler, North Carolina Department of Insurance Manufactured Building Division
Requested Action:	Revise Text
Proposed Change:	(5) Clothes washing machines. (i) Clothes washing machines shall drain either into a properly vented trap, into a laundry tub tailpiece with water tight connections, into an open standpipe receptor, or over the rim of a laundry tub. (ii) Standpipes must be either 2 ~~1 1/2~~ diameter minimum nominal iron pipe size, 2 ~~1 1/2~~ inch diameter nominal brass tubing of not less than No. 20 Brown and Sharp gauge, or 2 ~~1 1/2~~ inch diameter approved plastic materials. Receptors must discharge into a vented trap or must be connected to a laundry tub appliance by means of an approved or listed directional fitting. Each standpipe must extend not less than 18 inches or more than 42 inches above its trap and must terminate in an accessible location no lower than the top of the clothes washing machine. A removable, tight-fitting cap or plug must be installed on the standpipe when the clothes washer is not provided.
Reason:	Most if not all washing machine manufacturers require a 2" minimum standpipe. The IRC also requires a 2" waste receptor for washing machines. With today's high capacity washers we have had some instances were the flow from the washing machine pump overflows the standpipe and causes damage to the wall and floors in the utility or other areas. The current requirement of 1 1/2" diameter standpipe is in many cases is not large enough to handle the faster drainage of modern washers. The 2015 International Plumbing Code requires a 2" standpipe and trap and has for several years. A 2" trap is required to prevent it from functioning as an illegal S-trap.
Substantiating Documents:	Yes
Additional Cost:	Unknown
Cost Benefit Explanation:	The cost to change from an 1 1/2 inch to 2 inch would require no more than 6 feet of pipe and trap. The cost would be less than $25.00 for construction. The cost to change DAPIA drawings should also be minimal. The change would however be offset by fewer warranty claims and cost of inspection by manufacturers, especially if there is damage to the wall, floors and other components of the manufactured home.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 172 - § 3282.255(a) Completion of information card		Date: 12/21/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)	
Requested Action:	Revise Text	
Proposed Change:	Revise section 3282.255(a) to read as follows: (a) Whenever a distributor or retailer sells a manufactured home subject to the standards to a purchaser, the distributor or retailer shall fill out the card with information provided by the purchaser and shall send the card to the manufacturer <u>either electronically or by mail</u>. (See § 3282.211.)	
Reason:	In today's fast paced and technological world, many people and companies prefer to receive/send correspondences and forms via email as it is instantaneous unlike the mail which can delay the process. By allowing the option of sending the card via email, it will speed up processing times and alleviate the risk of the card getting "lost in the mail." It will also cut back on paperwork as the cards will not need to be scanned in order to be archived electronically.	
Substantiating Documents:	No	
Additional Cost:	No	
Cost Benefit Explanation:	The proposal would not result in a cost increase.	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	Received by Secretariat	
Log History:		

Log 173 - § 3280.105 Exit facilities; exterior doors	Date: 12/21/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)
Requested Action:	Revise Text
Proposed Change:	**Add the below language to 3280.105(a):** *Number and location of exterior doors.* Except as permitted per section (c), Manufactured homes shall have a minimum of two exterior doors located remote from each other. **Delete the below language from 3280.105(a)(2)(i):** Both of the required doors must not be in the same room. ~~or in a group of rooms which are not defined by fixed walls.~~ **Add a new section titled 3280.105(c) which states:** Manufactured homes shall be permitted to have one egress door when all the following conditions are met: 1. The means of egress shall provide a continuous unobstructed path of travel from all portions of the home to the exterior of home. Where a site-built garage is attached to the home, the path of egress shall not pass through the garage. 2. The egress door shall be side-hinged, and shall provide a minimum clear width of 32" when measured between the face of the door and the stop, with the door open 90 degrees. The minimum clear height of the door shall not be less than 78" measured from the top of the threshold to the bottom of the stop. 3. The egress door shall be readily openable from inside the home without the use of a key or special knowledge or effort. 4. Hallways in the home shall have a minimum horizontal dimension of 36" from interior finish to interior finish.
Reason:	In today's market, consumers desire open floor plans in their homes to allow for more flexibility for design aesthetics and to allow families to be together in one room. Current interpretation of Code requires a minimum of a 6" long full height wall segment to be installed within open floor plans in order to meet the "not in the same room or in a group of rooms which are not defined by fixed walls" requirement. Not only do homeowners not want these wall obstructions in their homes, they provide no advantage in fire safety. Furthermore, the International Residential Code (IRC) adopted by nearly all states does not require two egress doors, but rather only a single egress door. By including an additional subsection which language aligns with the requirements of the IRC which allows for a single egress door, this will allow builders of manufactured homes more flexibility.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	

MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 174 - § 3280.203 and 3280.204 Fire protection and Kitchen Cabinet	Date: 12/21/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)
Requested Action:	Revise Text
Proposed Change:	**Revise Section 3280.203 as follows:** 203(b)(4) ~~Exposed interior finishes adjacent to the cooking range shall have a flame spread rating not exceeding 50, except that back splashes not exceeding 6 inches in height are exempted. Adjacent surfaces are the exposed vertical surfaces between the range top height and the overhead cabinets and/or ceiling and within 6 horizontal inches of the cooking range. (Refer also to §3280.204(a), Kitchen Cabinet Protection.)Sealants and other trim materials 2 inches or less in width used to finish adjacent surfaces are exempt from this provision provided that all joints are completely supported by a framing member.~~ 203(c) Fire protective requirements.(1) Materials used to surface the following areas shall be of limited combustible material (e.g., 5/16-inch gypsum board, etc.): ~~(i) The exposed wall adjacent to the cooking range (see§3280.203(b)(4)); (ii) Exposed bottoms and sides of kitchen cabinets as required by §3280.204~~; (remaining text in this section is unchanged). **Revise Section 3280.204 as follows:** Section 3280.204 ~~Kitchen cabinet protection.~~ <u>Cook Top Clearance</u> ~~(a) The bottom and sides of combustible kitchen cabinets over cooking ranges to a horizontal distance of 6 inches from the outside edge of the cooking range shall be protected with at least 5/16-inch thick gypsum board or equivalent limited combustible material. One-inch nominal framing members and trim are exempted from this requirement. The cabinet area over the cooking range or cook tops shall be protected by a metal hood (26-gauge sheet metal, or .017 stainless steel, or .024 aluminum, or .020 copper) with not less than a 3-inch eyebrow projecting horizontally from the front cabinet face. The 5/16-inch thick gypsum board or equivalent material which is above the top of the hood may be supported by the hood. A 3/8-inch enclosed air spaces hall be provided between the bottom surface of the cabinet and the gypsum board or equivalent material. The hood shall be at least as wide as the cooking range.~~ ~~(b) The 3-inch metal eyebrow required by paragraph (a) of this section will project from the front and rear cabinet faces when there is no adjacent surface behind the range, or the 5/16- inch thick gypsum board or equivalent material shall be extended to cover all exposed rear surfaces of the cabinet.~~ ~~(c) The metal hood required by paragraphs (a) and(b) of this section can be omitted when an oven of equivalent metal protection is installed between the cabinet and the range and all exposed cabinet surfaces are protected as described in paragraph (a) of this section.~~ ~~(d) When a manufactured home is designed for the future installation of a cooking range, the metal hood and cabinet protection required by paragraph (a) of this section and the wall-surfacing protection behind the range required by §3280.203 shall be installed in the factory.~~ ~~(e)~~ Vertical clearance above cooking top. Ranges shall have a vertical clearance above the cooking top of not less than 24 inches to the bottom of combustible cabinets.
Reason:	These requirements are based on tests performed nearly 50 years ago, and at the time, the interpretation of those tests into standard requirements was questioned. These

	requirements are outdated since materials used in today's manufactured home construction, especially around the kitchen cook-top area, have changed dramatically. Manufactured homes are constructed very similar to site-built homes in terms of size and the materials used. Additionally, the International Residential Code does not contain any of these requirements. By deleting these requirements, manufactured homes will be on par with site-built homes.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 175 - § 3280.707 Heat producing appliances	Date: 12/21/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)
Requested Action:	Revise Text
Proposed Change:	**Delete Section 3280.707(a)(2) as follows:** Section 3280.707(a)~~(2) Each gas and oil burning comfort heating appliance must have an Annual Fuel Utilization Efficiency of not less than that specified in 10 CFR part 430, Energy Conservation Program for Consumer Products: Test Procedures for Furnaces/Boilers, Vented Home Heating Equipment and Pool Heaters.~~ **Revise Section 3280.707(c) as follows:** (c) Fuel-burning appliances shall not be converted from one fuel to another fuel unless converted in accordance with the terms of their listing and the appliance manufacturer's instructions. <u>Heat-producing appliances designed to burn Natural Gas or LP-Gas shall be convertible from one fuel to the other.</u> **Revise Section 3280.707(d) as follows:** Section 3280.707~~(d) Performance Efficiency~~ – Delete this section in its entirety.
Reason:	Today's manufactured homes are no different than site-built homes in terms of size and materials used. Listed appliances that work in site-built homes will also work in manufactured homes. Requiring all appliances to be listed for manufactured homes has, and currently does, restrict innovation. For example, solar hot water systems typically utilize a water heater with a capacity over 50 gallons, but there are no such water heaters listed "for use in manufactured homes".
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 176 - § 3280.714 Appliances, cooling	Date: 12/21/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)
Requested Action:	Delete Text
Proposed Change:	**Delete Section 3280.714(a)(1)(i) as follows**: Section 3280.714(a)(1)~~(i) Electric motor-driven unitary air-cooled air conditioners and heat pumps in the cooling mode with rated capacity less than 65,000 BTU/hour (19,045 watts), when rated at ARI standard rating conditions in ARI Standard 210/240-89, Unitary Air-Conditioning and Air-Source Heat Pump Equipment, must have seasonal energy efficiency (SEER) values not less than as specified in 10 CFR Part 430,Energy Conservation Program for Consumer Products: Central Air Conditioners and Heat Pumps Energy Conservation Standards.~~ **Delete Section 3280.714(a)(1)(iii) as follows:** Section 3280.714 (a)(1)~~(iii) Electric motor-driven vapor compression heat pumps with supplemental electric resistance heat conforming to ARI Standard 210/240–89 Unitary Air-Conditioning and Air-Source Heat Pump Equipment shall show coefficient of performance ratios not less than shown below:~~ ~~COP~~

~~Temperature degrees fahrenheit~~	~~Coefficient of performance~~
~~47~~	~~2.5~~
~~17~~	~~1.7~~
~~0~~	~~1.0~~

Reason:	Mandatory appliance efficiency ratings are set by other government agencies, therefore, there is no need to have these requirements in the MHCSS.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 177 - § 3280.305 and 3280.306 Structural design requirements and Windstorm protection	Date: 12/21/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)
Requested Action:	Revise Text

Proposed Change:

Revise section 3280.305(a) as follows:

(a) General. Each manufactured home shall be designed and constructed as a completely integrated structure capable of sustaining the design load requirements of this standard, and shall be capable of transmitting these loads to stabilizing devices without exceeding the allowable stresses or deflections. Roof framing shall be securely fastened to wall framing of second or first floor, walls of second floor or first floor to ceiling/floor structure, and ceiling/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 shall not extend beneath load-bearing walls that are fastened to the floor structure.

Revise Section 3280.305(c)(ii) as follows:

(A) The design wind loads for Exposure C specified in ANSI/ASCE 7-88,"Minimum Design Loads for Buildings and Other Structures," for a fifty-year recurrence interval, and a design wind speed of 100 mph, as specified for Wind Zone II, or 110 mph, as specified for Wind Zone III (Basic Wind Zone Map); or for single story units you can follow (B).

(B) The wind pressures specified in the following table:

Table of Design Wind Pressures

Elements	Wind zone II design wind speed 100 MPH	Wind zone III design wind speed 110 MPH
Anchorage for lateral and vertical stability (See §3280.306(a)):		
Net Horizontal Drag[1 2]:	[3]±39 PSF	[3]±47 PSF
Uplift[4]:	[5]-27 PSF	-32 PSF
Main wind force resisting system:		
Shear walls, Diaphragms and their Fastening and Anchorage Systems[1 2]	±39 PSF	±47 PSF
Ridge beams and other Main Roof Support Beams (Beams supporting expanding room sections, etc.)	-30 PSF	-36 PSF
Components and cladding:		
Roof trusses[4] in all areas; trusses shall be doubled within 3'-0'from each end of the roof	[5] -39 PSF	[5] -47 PSF
Exterior roof coverings, sheathing and fastenings[4,6,7] in all areas except the following	[5] -39 PSF	[5] -47 PSF
Within 3'-0' from each gable end (overhang at end wall) of the roof or endwall if no overhang is provided[4,6,7]	[5] -73 PSF	[5] -89 PSF

Within 3'-0' from the ridge and eave (overhang at sidewall) or sidewall if no eave is provided[4,6,7]	[5] -51 PSF	[5]-62 PSF
Eaves (Overhangs at Sidewalls)[4,6,7]	[5] -51 PSF	[5] -62 PSF
Gables (Overhangs at Endwalls)[4,6,7]	[5] -73 PSF	[5] -89 PSF
Wall studs in sidewalls and endwalls, exterior windows and sliding glass doors (glazing and framing), exterior coverings, sheathing and fastenings[8]:		
Within 3'-0' from each corner of the sidewall and endwall	±48 PSF	±58 PSF
All other areas	±38 PSF	±46 PSF

NOTES:

[1] The net horizontal drag of ±39 PSF to be used in calculating Anchorage for Lateral and Vertical Stability and for the design of Main Wind Force Resisting Systems is based on a distribution of wind pressures of + 0.8 or + 24 PSF to the windward wall and -0.5 or -15 PSF to the leeward wall.

[2] Horizontal drag pressures need not be applied to roof projections when the roof slope does not exceed 20 degrees.

[3] + sign would mean pressures are acting towards or on the structure; - sign means pressures are acting away from the structure; ± sign means forces can act in either direction, towards or away from the structure.

[4] Design values in this "Table" are only applicable to roof slopes between 10 degrees (nominal 2/12 slope) and 30 degrees.

[5] The design uplift pressures are the same whether they are applied normal to the surface of the roof or to the horizontal projection of the roof.

[6] Shingle roof coverings that are secured with 6 fasteners per shingle through an underlayment which is cemented to a 3/8" structural rated roof sheathing need not be evaluated for these design wind pressures.

[7] Structural rated roof sheathing that is at least 3/8" in thickness, installed with the long dimension perpendicular to roof framing supports, and secured with fasteners at 4" on center within 3'-0' of each gable end or end wall if no overhang is provided and 6" on center in all other areas, need not be evaluated for these design wind pressures.

[8] Exterior coverings that are secured at 6" o.c. to a 3/8" structural rated sheathing that is fastened to wall framing members at 6" on center need not be evaluated for these design wind pressures.

Revise section 3280.306(a) Wind storm protection as follows:

(a) Provisions for support and anchoring systems. Each manufactured home shall have provisions for support/anchoring or foundation systems that, when properly designed and installed, will resist overturning and lateral movement (sliding) of the manufactured home as imposed by the respective design loads. <u>For 2-story manufactured homes, the connections of 2nd story to 1st story shall have provisions for a complete load path of lateral, gravitational and uplift loads.</u> For Wind Zone I, the design wind loads to be used

	for calculating resistance to overturning and lateral movement shall be the simultaneous application of the wind loads indicated in §3280.305(c)(1)(i), increased by a factor of 1.5. The 1.5 factor of safety for Wind Zone I is also to be applied simultaneously to both the vertical building projection, as horizontal wind load, and across the surface of the full roof structure, as uplift loading. For Wind Zones II and III, the resistance shall be determined by the simultaneous application of the horizontal drag and uplift wind loads, in accordance with §3280.305(c)(1)(ii). The basic allowable stresses of materials required to resist overturning and lateral movement shall not be increased in the design and proportioning of these members. No additional shape or location factors need to be applied in the design of the tie down system. The dead load of the structure may be used to resist these wind loading effects in all Wind Zones. (1) The provisions of this section shall be followed and the support, ~~and~~ anchoring systems <u>and 2nd story to 1st story connections</u> shall be designed by a Registered Professional Engineer or Architect. (2) The manufacturer of each manufactured home is required to make provision for the support, ~~and~~ anchoring systems <u>and 2nd story to 1st story connections</u> but is not required to provide the anchoring equipment or stabilizing devices. When the manufacturer's installation instructions provide for the main frame structure to be used as the points for connection of diagonal ties, no specific connecting devices need be provided on the mainframe structure.
Reason:	With an affordable housing shortage in the nation, a growing population and the increasing value of land, manufactured homes can serve the communities better if they could be built with two levels. Currently the only way to build a two-story manufactured home is to go through the process of Alternative Construction procedures as detailed in Section 3282.14. This procedure is time consuming, limiting, and cost prohibitive due to the required additional onsite inspection and reporting process. Additionally, in the federal statute the definition of “manufactured housing” does not place limitations on the number of levels or heights of manufactured homes. By allowing for two-story construction, manufactured homes will align with other types of housing in the market such as modular and site-built homes. This will increase consumer confidence in manufactured homes and make them more desirable as a housing option for consumers.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 178 - § 3282.352 State exclusive IPIA functions	Date: 12/21/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)
Requested Action:	Revise Text
Proposed Change:	Revise section 3282.352 as follows: § 3282.352 State ~~exclusive~~ IPIA functions. (a) Any State which has an approved State Administrative Agency may, if accepted as an IPIA, act as the an exclusive IPIA within the State. ~~A State which acts as an IPIA but is not approved as an SAA may not act as the an exclusive IPIA in the State.~~ A State which acts as an exclusive IPIA shall be staffed to provide IPIA services to all manufacturers within the state and may not charge unreasonable fees for those services. (b) States which wish to act as ~~exclusive~~ IPIAs shall apply for approval to do so in their State plan applications. They shall specify the fees they will charge for IPIA services and shall submit proposed fee revisions to the Secretary prior to instituting any change in fees. If at any time the Secretary finds that those fees are not commensurate with the fees generally being charged for similar services, the Secretary will withhold or revoke approval to act as an ~~exclusive~~ IPIA. States acting as DAPIAs and also as ~~exclusive~~ IPIAs shall establish separate fees for the two functions and shall specify what additional services (such as approval of design changes and full time inspections) these fees cover. As provided in §3282.302(b)(11), each State shall submit fee schedules for its activities and, where appropriate, the fees presently charged for DAPIA and IPIA services, and any fees charged for DAPIA and IPIA services during the preceding two calendar years. (c) A State's status as an ~~exclusive~~ IPIA shall commence upon approval of the State Plan Application and acceptance of the State's submission under § 3282.355. ~~Where a private organization accepted or provisionally accepted as an IPIA under this subpart H is operating in a manufacturing plant within the State on the date the State's status as an exclusive IPIA commences, the private organization may provide IPIA services in that plant for 90 days after that date.~~
Reason:	Whether a private or state exclusive IPIA, all IPIAs must be approved by HUD and perform the same functions and adhere to the same requirements when evaluating the ability of manufactured home manufacturing plants to follow approved quality control procedures. Both private and state exclusive IPIAs perform ongoing surveillance of the manufacturing process, including representative unit inspections to assure that the manufacturer produces units that comply with the approved designs, and all IPIAs have the power to withhold certification of any non-conforming unit and to withhold the issuance of HUD certification labels. Neither HUD, nor its contractors, have shown any proof that state exclusive IPIAs perform better or worse than manufactured housing plants utilizing private IPIAs. To restrict manufactured housing plants in those states that have exclusive IPIAs is redundant and does not provide any benefits.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat

Log History:	

Log 179 - § 3280.2, 3282.8, 3282.14, 3282.601, and 3285.903 Accessory structure	Date: 12/21/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)
Requested Action:	Revise Text
Proposed Change:	**Add the following new definition under 3280.2:** Accessory building or structure means any awning, cabana, ramada, storage cabinet, carport, fence, windbreak, dormer, garage or porch which is accessory to and incidental to that of the dwelling(s)that is located on the manufactured home lot.[i] **Revise Section 3282.8 as follows:** 3282.8(j)Add-on. An add-on or accessory structure added by the retailer or some other party not the manufacturer (except where the manufacturer acts as a retailer) as part of a simultaneous transaction involving the sale of a new manufactured home, is not governed by the standards and is not subject to these regulations. However, the addition of the add-on or accessory structure must not affect the ability of the basic manufactured home to comply with the standards and shall meet either subpart (i) or (ii).If the addition of an add-on causes the basic manufactured home to fail to conform to the standards, sale, lease, and offer for sale or lease of the home is prohibited until the manufactured home is brought into conformance with the standards. ~~While the standards do not govern add-ons, the Secretary has the authority to promulgate standards for add-ons and may do so in the future.~~[ii] (i) Add-on or accessory structure must be structurally independent. (ii) If add-on or accessory structure is not structurally independent all the following must be met: (A) Manufactured home must be designed and constructed to accommodate all imposed loads. (B) Data plate must indicate that home has been designed to accommodate additional loads imposed by site attachment of add-on or accessory structures. (C) Installation instructions shall be provided with home which identifies acceptable on-site attachment locations, indicates design limits for site attached structure including acceptable: gravity, wind and shear forces which home has been designed to incorporate and provide support and anchorage designs as necessary to transfer imposed all loads. **Revise Section 3282.14 as follows:** 3282.14 (a) Policy. In order to promote the purposes of the Act, the Department will permit the sale or lease of one or more manufactured homes not in compliance with the Standards under circumstances wherein no affirmative action is needed to protect the public interest. An add-on or accessory structure which does not affect the performance and ability of the basic manufactured home to comply with the standard in accordance with 3282.8(j) is not governed by this subpart. The Department encourages innovation and the use of new technology in manufactured homes. Accordingly, HUD will permit manufacturers to utilize new designs or techniques not in compliance with the Standards in cases:

	Revise Section 3282.601 to add the following: 3282.601(c) An add-on or accessory structure which does not affect the performance and ability of the basic manufactured home to comply with the standard in accordance with 3282.8(j) is not governed by this section. **Revise Section 3285.903 as follows:** 3285.903(c) Installation of on-site structures. Each accessory building and structure or add-on is designed to support all of its own live and dead loads, unless the structure, including any attached garage, carport, deck, and porch, is to be attached to the manufactured home and is otherwise included in the installation instructions or designed by a registered professional engineer or registered architect. [i] This definition is consistent to3280.802(ii)(30) and definition of accessory structure within the IRC. [ii]The statute provides authority for Secretary to promulgate standards and it is unnecessary to reintegrate in statement within this paragraph.
Reason:	To provide clarification concerning design and construction requirements for accessory building and add-on including carports, awnings and garages, by addressing recent concerns reflected by HUD in guidance memos which have changed the regulations and enforcement of these add-ons. MHI continues in its belief that requiring Alternative Construction approval for homes that are in compliance with the standards when they leave a manufacturer's production facility is inconsistent with the letter, intent and purpose of 24 C.F.R. 3282.14. Current HUD code standards and regulations already provide direction on designing, constructing and installing a home to accommodate added forces from the on-site add-on and DAPIA approved installation instructions are provided. Manufacturers already design and construct such homes in accordance with the regulations. A carport/awning ready home is a home which has been constructed above and beyond the minimum imposed loads required by the standard with larger than needed headers, studs, rafter ties, etc. Nothing about a properly designed carport/awning ready home falls under the purpose or eligibility requirements for an AC request. 3285.903 (c) on "installation of on-site structures" specifically states "Each accessory building and structure is designed to support all of its own live and dead loads, unless the structure, including any attached garage, carport, deck and porch, is to be attached to the manufactured home and is otherwise included in the installation instructions or designed by a PE."
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat

Log History:	

Log 180 - § 3282.14(b) Alternative construction of manufactured homes	**Date: 12/21/2017**
Submitter:	Manuel Santana, Cavco Industries Inc.
Requested Action:	Revise Text
Proposed Change:	~~(5) An estimate of the maximum number of manufactured home units affected and th elocation, if known, to which the units will be shipped;~~ ~~(6) An indication of the period of time during which the manufacturer proposes to engage in the manufacture, sale or lease of the nonconforming homes;~~ ~~(7)~~ (5) A copy of the proposed notice to be provided to home purchasers; ~~(8)~~ (6) A list of the names and addresses of any retailers that would be selling the nonconforming homes; and ~~(9)~~ (7) A letter from the manufacturer's DAPIA indicating that the design(s) to which any nonconforming homes would be built meet the Standards in all other respects.
Reason:	Estimating the number of homes produced leads to artificial production limits that serve no purpose and cause delays from having to revise the AC approval when surges in demand occur. Estimating the period of time production is needed has led to artificial renewal periods that cause delays and increased cost from having to renew AC letters every two years while adding work to HUDs backlog. There is no benefit in terms of safety, durability, cost or ease of production to either the customer or manufacturer that comes from estimating the number of homes to be produced or the period of time that production is expected. Many AC request letters are required to compensate for the delays in updating the 3280 (such as tankless water heaters, whole house ventilation and wheelchair accessible showers). If the HUD code was updated in a timely fashion many AC letters would be unnecessary. HUD can devote time spent on renewing AC letters to updating the HUD code.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	There is a benefit in cost and time savings for manufacturers and HUD of not having to renew AC letters every two years
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 181 - § 3282.14(c)(3) Alternative construction of manufactured homes	Date: 12/21/2017
Submitter:	Manuel Santana, Cavco Industries Inc.
Requested Action:	Revise Text
Proposed Change:	(3)*Alternative construction in additional models.* ~~In cases where the Secretary grants a letter under this paragraph that is not model-specific, the Secretary may permit the manufacturer to include the alternative construction in additional models. In such cases, the DAPIA shall notify the Department of additional models that incorporate the alternative construction.~~ Alternative construction letters need not be model specific if the non-conforming elements can be explained and identified in general terms
Reason:	When an AC letter is granted for specific models it can add 6 months to a year to the production process because the model needs to be designed and the AC letter revised before the house can be sold to the consumer and built. The specific model design is not critical in determining whether or not an alternate construction letter is acceptable. All models and designs are required to be DAPIA approved, all non-conforming elements can be addressed without specifying a floor plan.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	There is a benefit in cost and time savings for manufacturers, HUD and consumers. In addition to increased flexibility and reduced time to market.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 182 - § 3282.7 Definitions; 3282 Subpart I Consumer Complaint Handling and Remedial Actions	Date: 12/22/2017
Submitter:	David Meunier, Arizona Department of Housing
Requested Action:	Revise Text
Proposed Change:	§3282.7 Definitions. (x) Noncompliance means a failure of a manufactured home to comply with a Federal manufactured home construction or safety standard that does not constitute ~~a defect,~~ serious defect~~, or imminent safety hazard~~. ~~See related definitions or defect (definition j), imminent safety hazard (definition q), and serious defect (definition ff).~~
Reason:	Purpose: Simplify 3282 Subpart I to remove the necessity for the excessive administrative activity required of manufacturers and IPIAs, but to retain the essential life safety protection for consumers of manufactured housing. Reduce the four actionable definitions to two. Eliminate "Defect" and "Imminent Safety Hazard" as separate categories and incorporate the key aspects of these concepts into the two remaining categories of nonconformance: Non-compliance (NC) and Serious Defect (SD). Retain the requirement for making initial determinations (NC and SD) for reported potential nonconformance, and class determination for SD. The key is in the definitions of nonconformance as used by HUD. The definitions should be tied to life safety concerns only. Remove the requirement for class determination for relatively minor defects, and focus the requirements for escalation on those items that constitute a genuine safety risk. Nonconformance would still require an Initial Determination of severity; the options would be: Non-compliance, or Serious Defect. Serious Defect may or may not also contain an Imminent Safety hazard. Subsequent aspects of 3282 Subpart I (notification, correction, etc.) would remain as is. Proposed new definitions: •Noncompliance means a failure of a manufactured home to comply with a Federal manufactured home construction or safety standard that does not constitute a serious defect. Example: Leak under kitchen sink, only when water is actually running. Cause – connecting ring of P-trap is broken, over tightened in factory, P-trap does not seal to sink drain tail piece. Initial Determination – Noncompliance, parts will have to be replaced, but there is no reasonable risk of injury present. •Serious defect means any failure to comply with an applicable Federal manufactured home construction and safety standard that renders the manufactured home or any part thereof not fit for the ordinary use for which it was intended, presents a potential and unreasonable risk of injury, and which may or may not result in an imminent safety hazard to occupants of the affected manufactured home. Example: Incorrect type/grade of plywood used to fabricate ridge beam. Ridge beam as built is incapable of meeting design loads. Three homes built with incorrect plywood, one is a dealer lot display model, two still at factory. Cause – Purchasing documents not sufficiently specific as to type/grade of plywood required. Production personnel untrained in the specific requirements and unable to identify plywood as wrong. Initial Determination – Serious Defect, a real danger of partial if not complete collapse of the home is present, however, since no homes are occupied, no imminent safety hazard is present. •Imminent safety hazard means a hazard that presents an imminent risk of death or severe personal injury that may or may not be related to failure to comply with an applicable Federal manufactured home construction or safety standard. Example: Fire place flue was not properly connected to roof cap allowing products of combustion to escape into the attic space. This was not discovered until the homeowner lit the fireplace and noticed smoke coming out of the attic vents. Cause – poor workmanship in factory. Initial Determination – Serious Defect that constitutes an Imminent Safety Hazard.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Eliminating the requirement for repetitive analysis and documentation of minor service items will streamline the processing of all customer requested repairs and allow more

	resource to properly analyze, document, and act on those items that truly pose a concern for homeowner safety.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 183 - § 3280.711 Instructions		Date: 12/22/2017
Submitter:	Mark Ezzo, Clayton Homes	
Requested Action:	Delete Text	
Proposed Change:	3280.711 Instructions ~~Operating instructions must be provided with each appliance.~~ The operating and installation instructions for each appliance must be provided with the homeowner's manual.	
Reason:	Removing the first sentence of 3280.711 eliminates the need for manufacturers to provide a second set of instructions attached to ("with") each appliance. Appliance manufacturers only supply one set of instructions & user manual with each appliance. There is no need to provide two sets; the operating & installation instructions supplied in the homeowner manual are more than sufficient. There is no need to provide two sets; the operating & installation instructions supplied in the homeowner manual are more than sufficient. Also, this suggested change to 3280.711 compliments MHCC log 92, approved by the committee, which strikes "The installer shall leave the manufacturer's instructions attached to each appliance" from 3280.709(a). Proposal is intended to replace and supersede MHCC log 143# which was passed by MHCC as: 3280.711 Operating Instructions must be provided with each appliance unless the appliance is affixed with a permanent Quick Response (QR) Code. The operating instructions for each appliance must be provided with the homeowner's manual.	
Substantiating Documents:	No	
Additional Cost:	No	
Cost Benefit Explanation:	Will reduce cost associated with reproducing appliance manuals.	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	Received by Secretariat	
Log History:		

Log 184 - § 3280.304 (b)(1) Materials & 3280.307 Resistance to elements and use	Date: 12/22/2017
Submitter:	Joe Sadler, North Carolina Department of Insurance Manufactured Building Division
Requested Action:	New Text
Proposed Change:	**3280.304 Materials.** (a) Dimension and board lumber shall not exceed 19 percent moisture content at time of installation. (b)(1) Standards for some of the generally used materials and methods of construction are listed in the following table: **Aluminum** Aluminum Design Manual, Specifications and Guidelines for Aluminum Structures, Part 1-A, Sixth Edition, October 1994, and Part 1-B, First Edition, October 1994. **Steel** Specification for Structural Steel Buildings—Allowable Stress Design and Plastic Design—AISC-S335, 1989. The following parts of this reference standard are not applicable: 1.3.3, 1.3.4, 1.3.5, 1.3.6, 1.4.6, 1.5.1.5, 1.5.5, 1.6, 1.7, 1.8, 1.9, 1.10.4 through 1.10.7, 1.10.9, 1.11, 1.13, 1.14.5, 1.17.7 through 1.17.9, 1.19.1, 1.19.3, 1.20, 1.21, 1.23.7, 1.24, 1.25.1 through 1.25.5, 1.26.4, 2.3, 2.4, 2.8 through 2.10. Specification for the Design of Cold-Formed Steel Structural Members—AISI-1996. Specification for the Design of Cold-Formed Stainless Steel Structural Members—SEI/ASCE 8-02, 2002. Standard Specifications Load Tables and Weight Tables for Steel Joists and Joist Girders, SJI, Fortieth Edition, 1994. Structural Applications of Steel Cables for Buildings—ASCE19, 1996. Standard Specification for Strapping, Flat Steel and Seals—ASTM D3953, 1991. **Wood and Wood Products** Basic Hardboard—ANSI/AHA A135.4-1995. Prefinished Hardboard Paneling—ANSI/AHA A135.5-1995. Hardboard Siding—ANSI/AHA A135.6-1998. American National Standard for Hardwood and Decorative Plywood—ANSI/HPVA HP-1-1994 (Approved 1995). Structural Design Guide for Hardwood Plywood Wall Panels—HPVA Design Guide HP-SG-96, 1996. For wood products—Structural Glued Laminated Timber—ANSI/AITC A190.1-1992. Construction and Industrial Plywood (With Typical APA Trademarks)—PS 1-95. APA Design/Construction Guide, Residential and Commercial—APA E30-P-1996. Design Specifications for Metal Plate and Wood Connected Trusses—TPI-85. Design and Fabrication of All-Plywood Beams—APA H-815E (PDS Supplement #5), 1995. Panel Design Specification—APA D410A, 2004.

Design and Fabrication of Glued Plywood-Lumber Beams, Supplement# 2—APA S 812R, 1992 (incorporated by reference, see §3280.4).

Design and Fabrication of Plywood Curved Panels—APA-S 811M, Suppl. 1, 1990.

Design and Fabrication of Plywood Sandwich Panels, Supplement #4—APA U 814H, 1990 (incorporated by reference, see §3280.4).

Performance Standard for Wood-Based Structural Use Panels—NIST PS 2-04, 2004 (incorporated by reference, see §3280.4).

Design and Fabrication of Plywood Stressed-Skin Panels, Supplement 3—APA-U 813L, 1992 (incorporated by reference, see §3280.4).

National Design Specifications for Wood Construction, 2001 Edition, with Supplement, Design Values for Wood Construction, NDS-2001, ANSI/AFPA.

Wood Structural Design Data, 1986 Edition with 1992 Revisions, AFPA.

Span Tables for Joists and Rafters—PS-20-70, 1993, AFPA.

Design Values for Joists and Rafters 1992, AFPA.

Particleboard—ANSI A208.1-1999.

Voluntary Specifications for Aluminum, Vinyl (PVC) and Wood Windows and Glass Doors—ANSI/AAMA/NWWDA 101/I.S.2-97.

Standard Test Methods for Puncture and Stiffness of Paperboard, and Corrugated and Solid Fiberboard—ASTM D781, 1973.

Standard Test Methods for Direct Moisture Content Measurement of Wood and Wood-Base Materials—ASTM D 4442-92 (Re-approved 1997), 1997.

Standard Test Methods for Use and Calibration of Hand-Held Moisture Meters—ASTM D4444, 1992.

Engineered Wood Construction Guide—APA E30R 2001 (incorporated by reference, see §3280.4).

Medium Density Fiberboard (MDF) For Interior Applications—ANSI A208.2-2002 (incorporated by reference, see §3280.4).

Other
Standard Specification for Gypsum Wallboard—ASTM C 36/C 36M-99, 1999.

Standard Specification for Rigid Poly(Vinyl Chloride) (PVC) Siding - D 3679-17

Standard Specification for (Unplasticized) Poly(Vinyl Chloride) (PVC) Soffit - D 4477-16

Standard Practice for Installation of Rigid Poly(Vinyl Chloride) (PVC) Siding and Soffit - D 4756-16

Fasteners
National Evaluation Report, Power Driven Staples, Nails, and Allied Fasteners for Use in All Types of Building Construction—NER-272, 1997.

Unclassified
Minimum Design Loads for Buildings and Other Structures—ASCE 7-1988.

Standard for Safety Glazing Materials used in Buildings—Safety Performance Specifications and Methods of Test, ANSI Z97.1-2004 (incorporated by reference, see §3280.4).

(2) Materials and methods of construction utilized in the design and construction of manufactured homes which are covered by the standards in the following table, or any applicable portion thereof shall comply with these requirements.

(3) Engineering analysis and testing methods contained in these references shall be utilized to judge conformance with accepted engineering practices required in §3280.303(c).

(4) Materials and methods of installation conforming to these standards shall be considered acceptable when installed in conformance with the requirements of this part.

(5) Materials meeting the standards (or the applicable portion thereof) are considered acceptable unless otherwise specified herein or unless substantial doubt exists as to conformance.

(c) Wood products shall be identified as complying with the appropriate standards.

[40 FR 58752, Dec. 18, 1975, as amended at 42 FR 961, Jan. 4, 1977. Redesignated at 44 FR 20679, Apr. 6, 1979, as amended at 58 FR 55006, Oct. 25, 1993; 59 FR 15113, Mar. 31, 1994; 70 FR 72043, Nov. 30, 2005; 78 FR 73982, Dec. 9, 2013]

§3280.307 Resistance to elements and use.
(a) Exterior coverings shall be of moisture and weather resistive materials attached with corrosion resistant fasteners to resist wind, snow and rain. Metal coverings and exposed metal structural members shall be of corrosion resistant materials or shall be protected to resist corrosion. All joints between portions of the exterior covering shall be designed, and assembled to protect against the infiltration of air and water, except for any designed ventilation of wall or roof cavity.

(b) Joints between dissimilar materials and joints between exterior coverings and frames of openings shall be protected with a compatible sealant suitable to resist infiltration of air or water.

(c) Where adjoining materials or assemblies of materials are of such nature that separation can occur due to expansion, contraction, wind loads or other loads induced by erection or transportation, sealants shall be of a type that maintains protection against infiltration or penetration by air, moisture or vermin.

(d) Exterior surfaces shall be sealed to resist the entrance of rodents.

<u>(e) Rigid Poly (Vinyl Chloride) (PVC) siding and soffit exterior covering material shall be manufactured and installed in accordance with this Part and ASTM D3679, ASTM D4477 and ASTM D4756 (incorporated by reference, see §3280.4)</u>

Reason:	When the 1976 Manufactured Housing Act was signed the manufactured housing industry did not use poly vinyl chloride siding to the extent it does today. No standards for vinyl siding materials and installation are in 3280 or the other Parts of the manufactured housing standards and regulations. Many if not most of the siding manufacturers have installation instructions that reference the Vinyl Siding Institute Installation Instructions, which in turn reference ASTM standards for material and installation. I propose HUD adds these ASTM standards to 3280.304 so there is a consistent standard for material and installation of vinyl siding. This should also extend to the use of vinyl soffit material. North Carolina as an SAA has had numerous problems with siding due to improper installation methods used in the manufacturing facilities. HUD has monitored class determinations for siding problems as prescribed in Subpart-I of 3282.
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	There would be no increased cost due to the fact that the material should be installed properly especially when the use of Form Core sheathing is used on homes. We have heard from several retailers indicating that call backs for siding has been an ongoing issue. This would also be the case for home manufacturers. It would be fair to assume that there would actually be an overall savings due to fewing service calls pertaining to siding.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 185 - § 3280.106 Exit facilities; egress windows and devices	Date: 12/27/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Revise Text
Proposed Change:	**§3280.106. Exit facilities; egress windows and devices** (a) Every room designed expressly for sleeping purposes, unless it has an exit door (see§3280.105), shall have at least one outside window or approved exit device which meets the requirements of §3280.404, the "Standard for Egress Windows and Devices for Use in Manufactured Homes." (b) Minimum dimensions. The bottom of the window opening shall not be more than 36 inches above the floor. The minimum net clear opening height dimension shall be 24 inches (610 mm). The minimum net clear opening width dimension shall be 20 inches (508 mm). The net clear opening dimensions shall be the result of normal operation of the opening. (c)Locks, latches, operating handles, tabs, and any other window screen or storm window devices which need to be operated in order to permit exiting, shall not be located in excess of 54 inches from the finished floor. (d) Integral rolled-in screens shall not be permitted in an egress window unless the window is of the hinged-type.
Reason:	Revise section to incorporate minimum height and width (opening) for an egress window. In the latest published edition of the Standards a minimum clearance requirement was removed.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown This proposal should be cost neutral. The proposed language will clarify and standardize egress window requirements by incorporating common enforcement industry language and thereby eliminate the potential for costly delays or mistakes.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 186 - § 3280.6 Serial number	Date: 12/27/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Revise Text
Proposed Change:	**§ 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 <u>and on each transportable section of a manufactured home with multiple floors</u>. Letters and numbers must be 3/8 inch minimum in height. Numbers must not be stamped into hitch assembly or draw bar.
Reason:	This proposal clarifies the existing standard. Each part of a multi-unit manufactured should have individual identification to ensure matching and for purposes of tracking construction history.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown Minimal cost for additional identification.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 187 - § 3280.105 Exit facilities; exterior doors	Date: 12/27/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Revise Text
Proposed Change:	**§ 3280.105. Exit facilities; exterior doors** (a) Number and location of exterior doors. Manufactured homes shall have a minimum of two exterior doors located remote from each other. (1) Required egress doors shall not be located in rooms where a lockable interior door must be used in order to exit. (2) In order for exit doors to be considered remote from each other, they must comply with all of the following: (i) Both of the required doors must not be in the same room or in a group of rooms which are not defined by fixed walls <u>at least NN feet in length</u>. (Include a minimum length of the fixed wall in order to define rooms.) (ii) Single wide units. Doors may not be less than 12 ft. c-c from each other as measured in any straight line direction regardless of the length of path of travel between doors.
Reason:	The length of the fixed wall needs to be specified to avoid confusion with walls for alcoves.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown This proposal should be cost neutral.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 188 - § 3280.607(b)(3)(i) Plumbing fixtures	Date: 12/27/2017
Submitter:	Manuel Santana, Cavco Industries Inc.
Requested Action:	Delete Text
Proposed Change:	The wall area shall be constructed of smooth, noncorrosive, and nonabsorbent ~~waterproof~~ materials to a height not less than 6 feet above the bathroom floor level
Reason:	Shower stalls are routinely being made of materials which by themselves are not considered waterproof such as ceramic tiles and stone material. The requirement for the wall area to be constructed from a material that is waterproof should be changed to reflect the use of these types of materials. Manufacturers have been cited for this issue during plant audits, unnecessarily taking time and resources to respond. IRC sections R307.2 and P2710.1 require that shower stall compartments be finished with a smooth, non-absorbent surface. This is all that should be required for shower stall finishes.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	This change will incur no additional cost
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 189 - § 3280.113 Glass and glazed openings	Date: 12/27/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Revise Text
Proposed Change:	**§ 3280.113. Glass and glazed openings** (a) Windows and sliding glass doors. All windows and sliding glass doors shall meet the requirements of §3280.403 the "Standard for Windows and Sliding Glass Doors Used in Manufactured Homes". (b) Hazardous locations requiring safety glazing. Except as provided in paragraph (d) of this section, the following locations and are as require the use of safety glazing conforming to the requirements of paragraph(c) of this section: (1) Glazing in all entrance or exit doors; (2) Glazing in fixed and sliding panels of sliding glass doors; (3) Glazing in storm-type doors; (4) Glazing in unframed side-hinged swinging doors; (5) Glazing in doors, ~~and~~ fixed panels, and windows less than 60 inches above the room floor level that enclose bathtubs, showers, hydromassage tubs, hot tubs, whirlpools, saunas;
Reason:	This section does not specify window glazing over a tub, hot tubs, whirlpools and saunas. This could result in a person slipping in a tub and falling through a window and getting hurt by sharp broken glass.
Substantiating Documents:	No
Additional Cost:	Yes
Cost Benefit Explanation:	Minimal increase in cost due to use of safety glass. However, this proposal should be cost neutral since it is a safety measure and similar to requirements for site-built residential occupancies.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 190 - § 3286.803 State qualifying installation program & 3286.2 Applicability	Date: 12/27/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Revise Text
Proposed Change:	The Department recommends modification to Sections 3286.2 and 3286.803 of Title 24, Subtitle B, Chapter XX, Part 3286, to clarify recognition of state installation programs in place prior to the effective date of Part 3286. These Sections are unnecessary and present serious inconsistencies with the U.S.C. **§3286.803.State qualifying installation program** (a) Qualifying installation program supersedes. The HUD-administered installation program will not be implemented in any state that is identified as fully or conditionally accepted under the requirements and procedures of this subpart I or in accordance with part 3282 of this chapter. <u>This Part shall not apply to any state with an installation program implemented prior to June 20, 2008, and still in operation.</u> **§3286.2.Applicability** (c)States with installation programs. The requirements in subpart I of this part are applicable to only those states that want to administer their own installation programs in lieu of the installation program administered by HUD in accordance with this part. <u>This Part shall not apply to any state with an installation programs implemented prior to June 20, 2008, and still in operation.</u>
Reason:	Part 3286 became effective June 20, 2008. This is subsequent to the implementation of some state installation programs, including the California installation program. HUD's current enforcement of Part 3286 imposes unnecessary burdens on state programs that have been established far before Part 3286 was effective. As it relates to state installation programs and in order to comply with President Trump's Executive Order 13771, HUD should consider state supremacy as specified within U.S.C., Title 42, Chapter 70, [Public Law 93-383, Title VI, Section 604], Section 5403(d) which specifies that " there is reserved to each State the right to establish standards for the stabilizing and support systems of manufactured homes sited within that State, and for the foundations on which manufactured homes sited within that State are installed, and the right to enforce compliance with such standards, except that such standards shall be consistent with the purposes of this chapter and shall be consistent with the design of the manufacturer." To deviate from the U.S.C. is arbitrary and capricious and creates a serious inconsistency with the implementing regulations.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown Costs of new federal regulations superseding competent state regulations will impact housing affordability. These costs would be related to permitting, installing, and inspecting new manufactured homes in California (and other state laws and regulations similarly preceding federal installation regulations). Additionally, no data has been provided to indicate that existing state regulations are deficient in performance.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 191 - § 3280.404. Standard for egress windows and devices for use in manufactured homes	Date: 12/27/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Revise Text
Proposed Change:	**§ 3280.404. Standard for egress windows and devices for use in manufactured homes** (c)Installation. (1) The installation of egress windows or devices shall be installed in a manner which allows for proper operation and provides protection against the elements. (See §3280.307.)… (d) Minimum dimensions. The bottom of the window opening shall not be more than 36 inches above the floor. The minimum net clear opening height dimension shall be 24 inches (610 mm). The minimum net clear opening width dimension shall be 20 inches (508 mm). The net clear opening dimensions shall be the result of normal operation of the opening. (e) Operating instructions.… ~~(e)~~ (f) Certification of egress windows and devices. … ~~(f)~~ (g) Protection of egress window openings in high wind areas. …
Reason:	By incorporating common enforcement industry language, the proposed language will clarify and standardize egress window requirements. The proposed dimensions are also similar to those required for site-built residential occupancies.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown This proposal should be cost neutral, however, it will also eliminate the potential for costly delays or mistakes.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 192 - § 3285.4(h)(2) Incorporation by reference (IBR)	Date: 12/28/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Revise Text
Proposed Change:	Revise Section 3285.4(h)(2) to incorporate by reference the current version of the National Electrical Code (NFPA 70-2017). The latest published edition is the 2017 National Electrical Code. Other references to NFPA 70-2005 in Section 3285 would need updating to a newer reference code. California further recommends that the MHCC convene a stakeholder evaluation of this proposal.
Reason:	National Electrical Code has changed significantly since the 2005 version providing additional safety features, as well as accommodating new technology and materials. Some changes include additional safety through expanded use of ground fault circuit interrupters, arc-fault circuit interrupters, and tamper-resistant receptacles. Other changes accommodate new materials and technology related to electric vehicle charging, use of photovoltaic systems, and battery storage systems. California will be adopting the 2017 National Electrical Code as its 2019 California Electrical Code (effective January 1, 2020). The current California Electrical Code is based on the 2014 National Electrical Code. Residents of manufactured homes should have the same level of safety for applicable electrical systems as for site-built homes.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown The National Electrical Code is amended primarily for fire and safety purposes. The benefit would be additional protection to residents and property. Another benefit would be a usable code including provisions for the latest technology and materials when used for manufactured housing.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 193 - § 3280.4 Incorporation by Reference & 3280.801 Scope	Date: 12/28/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Revise Text
Proposed Change:	Revise Section 3280.4(aa)(4) to incorporate by reference the current version of the National Electrical Code(NFPA 70-2017). The latest published edition is the 2017 National Electrical Code. Update article references in subsections (i) through (xix) as necessary. Additional sections within Section 3280 would need updated references from NFPA 70-2005 to NFPA 70-2017. **Section 3280.4 Incorporation by reference** (a) The specifications, standard, and codes of the following organizations are incorporated by reference in 24 CFR part 3280 (this Standard)… … (aa) National Fire Protection Association (NFPA), 1 Batterymarch Park, Quincy, MA 02269, phone number 617-770-3000, fax number 617-770-0700, Web site: http://www.nfpa.org. … (4) NFPA No. 70-2017~~05~~,National Electrical Code, IBR approved as follows: (i) Article 110.22,IBR approved for §§3280.803(k) and 3280.804(k). (ii) Article210.12(A) and (B), IBR approved for §3280.801(b). (iii) Article 220.61,IBR approved for §3280.811(b). (iv) Article 230, IBRapproved for §§3280.803(k) and 3280.804(k). (v) Article 250.24,IBR approved for §§3280.803(k) and 3280.804(k). (vi) Article 250.26,IBR approved for §§3280.803(k) and 3280.804(k). (vii) Article 250.28,IBR approved for §§3280.803(k) and 3280.804(k). (viii) Article312.2(A), IBR approved for §§3280.803(k) and 3280.804(k). (x) Table 314.16(A),IBR approved for §§3280.808(m) and 3280.808(q). (ix) Article314.23(B), IBR approved for §§3280.808(m) and 3280.808(q). (xi) Article 406.3,IBR approved for §3280.807(d). (xii) Article410.4(D), IBR approved for §3280.805(a). (xiii) Article 440, IBRapproved for §3280.805(a). (xiv) Article 440.65,IBR approved for §3280.801(b). (xv) Part II of Article550, IBR approved for §§3280.801(a) and 3280.801(b). (xvi) Article550.25(a), IBR approved for §3280.801(b). (xvii) Article 680.70,IBR approved for §§3280.607(c) and 3280.801(a).

	(xviii) Article 680.71, IBR approved for §§3280.607(c) and 3280.801(a). (xix) Articles 680.72, IBR approved for §§3280.607(c) and 3280.801(a). **Section 3280.801. Scope** (a) Subpart I of this part and Part II of Article 550 of the National Electrical Code (NFPA No. 70-2017~~05~~)cover the electrical conductors and equipment installed within or on manufactured homes and the conductors that connect manufactured homes to a supply of electricity. (b) In addition to the requirements of this part and Part II of Article 550 of the National Electrical Code (NFPA No. 70-2005), the applicable portions of other Articles of the National Electrical Code must be followed for electrical installations in manufactured homes. ~~The use of arc-fault breakers under Articles 210.12(A) and (B), 440.65, and 550.25(A) and (B) of the National Electrical Code, NFPA No. 70-2005 is not required. However, if arc-fault breakers are provided, such use must be in accordance with the National Electrical Code, NFPA No. 70-2005. Wherever the requirements of this standard differ from the National Electrical Code, these standards apply.~~ California further recommends that the MHCC convene a stakeholder evaluation of this proposal.
Reason:	The National Electrical Code has changed significantly since the 2005 version providing additional safety features, as well as accommodating new technology and materials. Some changes include additional safety through expanded use of ground fault circuit interrupters, arc-fault circuit interrupters, and tamper-resistant receptacles. Other changes accommodate new materials and technology related to electric vehicle charging, use of photovoltaic systems, and battery storage systems. California will be adopting the 2017 National Electrical Code as its 2019 California Electrical Code (effective January 1, 2020). The current California Electrical Code is based on the 2014 National Electrical Code. Residents of manufactured homes should have the same level of safety for applicable electrical systems as for site-built homes.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown The National Electrical Code is amended primarily for fire and safety purposes. The benefit would be additional protection to residents and property. Another benefit would be a usable code including provisions for the latest technology and materials when used for manufactured housing.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 194 - § 3282.7 (j), (x) and adding (lll) Definitions	Date: 12/28/2017
Submitter:	Michael Wade, Manufactured Housing Institute (MHI)
Requested Action:	Revise Text
Proposed Change:	**§3282.7 Definitions.** The terms Department, HUD, and Secretary are defined in 24 CFR part 5. (j)Defect means a failure to comply with an applicable Federal manufactured home safety and construction standard that renders the manufactured home ~~or any part or component thereof~~ not fit for occupancy ~~the ordinary use for which it was intended~~, but does not result in an unreasonable risk of injury or death to occupants of the affected manufactured home. See related definitions of imminent safety hazard (definition q), noncompliance(definition x), and serious defect (definition ff). (x)Noncompliance means a failure ~~of a manufactured home to comply with a Federal manufactured home construction or safety standard that does~~ to comply with an applicable Federal manufactured home safety and construction standard that renders any part or component thereof not fit for the ordinary use for which it was intended, but does not constitute a defect, serious defect, or imminent safety hazard. See related definitions or defect (definition j), imminent safety hazard (definition q), and serious defect (definition ff). (lll) Systematically means methodically performing a work process in a manner that will result in a consistent, repetitive result for a majority of the time, as referred to in 3282.404(a). Systematically does not mean random or occasional occurrences.
Reason:	The historical classification of Defect has been very broad due to the current definition. It would seem logical to consider the identification of a class of homes to be necessary when an Imminent Safety Hazard, Serious Defect or a Defect exists, which prevents normal occupancy within a home. However, for a home manufacturer to be required to go through the rigorous duty of class searches, hours of paper work, potential investigations of homes in the possession of owners, Class identifications, notifications, etc., for items that do not have an impact upon the actual livability or normal dwelling /occupancy within a home, does not seem logical. Only items that impair true functionality of a home, should be considered a Defect. Items that do not perform as originally intended, yet are not significant enough to have an impact upon normal livability or occupancy, should be considered a Non-Compliance. Considering these situations, revised definitions of Defect and Non-Compliance are being submitted. To go along with these, the word Systematically is mentioned in 3282, specifically in 3282.404, but this phrase/word currently does not have a listed definition. Thus a definition has been proposed.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The cost benefit to the industry will be potentially less labor intensive listing/grouping/identifying of particularly trivial items that will be corrected/covered under the typical warranty process (which would be considered Non-Compliances), and that do not present an impact on the livability or dwelling of the home.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	

Current Status:	Received by Secretariat
Log History:	

Log 195 - § 3282 Subpart M - On-Site Completion of Construction of Manufactured Homes	Date: 12/28/2017
Submitter:	Henry Greene, State of California Department of Housing and Community Development
Requested Action:	Delete Text
Proposed Change:	~~Subpart M. [Effective March 7, 2016] On-Site Completion of Construction of Manufactured Homes~~ ~~[Publisher's Note: Subpart M (Sections 3282.601 - 3282.611) was added at 80 FR 53727, September 8,2015, effective March 7, 2016.]~~ ~~§ 3282.601. Purpose and applicability.~~ ~~(a) Purpose of section. Under HUD oversight, this section establishes the procedure for limited on-site completion of some aspects of construction that cannot be completed at the factory.~~ ~~(b) Applicability. This section may be applied when all requirements of this subpart are met. To be applicable a manufactured home must:~~ ~~(1) Be substantially completed in the factory;~~ ~~(2) Meet the requirements of the Construction and Safety Standards upon completion of the site work; and~~ ~~(3) Be inspected by the manufacturer's IPIA as provided in this subpart, unless specifically exempted as installation under HUD's Model Installation Standards, 24 CFR part 3285.This subpart does not apply to Alternative Construction (see §3282.14) that does not comply with the Manufactured Home Construction and Safety Standards.~~ ~~AUTHORITY~~ ~~28 U.S.C. 2461 note; 42U.S.C. 3535(d); 42 U.S.C. 5424.~~ ~~HISTORY~~ ~~80 FR 53727, Sept. 8, 2015~~ ~~§ 3282.602. Construction qualifying for on-site completion.~~ ~~(a) The manufacturer, the manufacturer's DAPIA acting on behalf of HUD, and the manufacturer's IPIA acting on behalf of HUD may agree to permit certain aspects of construction of a manufactured home to be completed to the Construction and Safety Standards on-site in accordance with the requirements of this subpart. The aspects of construction that may be approved to be completed on-site are the partial completion of structural assemblies or systems (e.g., electrical, plumbing, heating, cooling, fuel burning, and fire safety systems) and components built as an integral part of the home, when the partial completion on-site is warranted because completion of the partial structural assembly or system during the manufacturing process in the factory would not be practicable (e.g., because of the home design or which could result in transportation damage or if precluded because of road restrictions). Examples of construction that may be completed on-site include:~~ ~~(1) Hinged roof and eave construction, unless exempted as installation by §3285.801(f) of the Model Manufactured Home Installation Standards and completed and inspected in accordance with the Manufactured Home Installation Program;~~

~~(2) Any work required by the home design that cannot be completed in the factory, or when the manufacturer authorizes the retailer to provide an add-on, not including an attached garage, to the home during installation, when that work would take the home out of conformance with the construction and safety standards and then bring it back into conformance;~~

~~(3) Appliances provided by the manufacturer, installer, retailer, or purchaser, including fireplaces to be installed on site;~~

~~(4) Components or parts that are shipped loose with the manufactured home and that will be installed on-site, unless exempted as installation by the installation standards;~~

~~(5) Exterior applications such as brick siding, stucco, or tile roof systems; and~~

~~(6) Other construction such as roof extensions (dormers), site-installed windows in roofs, removable or open floor sections for basement stairs, and sidewall bay windows.~~

~~(b) The manufacturer or a licensed contractor or similarly qualified professional with prior authorization from the manufacturer may perform the on-site work in accordance with the DAPIA approvals and site completion instructions. However, the manufacturer is responsible for the adequacy of all on-site completion work regardless of who does the work, and must prepare and provide all site inspection reports, as well as the certification of completion, and must fulfill all of its responsibilities and maintain all records at the factory of origin as required by §3282.609.~~

~~AUTHORITY~~

~~28 U.S.C. 2461 note; 42U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727, Sept. 8, 2015~~

~~§ 3282.603. Request for approval; DAPIA review, notification, and approval.~~

~~(a) Manufacturer's request for approval. The manufacturer must request, in writing, and obtain approval of its DAPIA for any aspect of construction that is to be completed on-site under this subpart. The manufacturer, its IPIA, and its DAPIA must work together to reach agreements necessary to enable the request to be reviewed and approved.~~

~~(b) DAPIA notification. The DAPIA, acting on behalf of HUD, must notify the manufacturer of the results of the DAPIA's review of the manufacturer's request, and must retain a copy of the notification in the DAPIA's records. The DAPIA shall also forward a copy of the approval to HUD or the Secretary's agent as provided under §3282.361(a)(4). The notification must either:~~

~~(1) Approve the request if it is consistent with this section and the objectives of the Act; or~~

~~(2) Deny the proposed on-site completion and set out the reasons for the denial.~~

~~(c) Manner of DAPIA approval. Notification of DAPIA approval must include, by incorporation or by listing, the information required by paragraph (d) of this section, and must be indicated by the DAPIA placing its stamp of approval or authorized signature on each page of the manufacturer's designs submitted with its request for approval. The DAPIA must include an "SC" designation on each page that includes an~~

~~element of construction that is to be completed on-site and must include those pages as part of the approved design package.~~

~~(d) Contents of DAPIA approval. Any approval by the DAPIA under this section must:~~

~~(1) Include a unique site completion numeric identification for each approval for each manufacturer (i.e., manufacturer name or abbreviation, SC-XX);~~

~~(2)Identify the work to be completed on-site;~~

~~(3) List all models to which the approval applies, or indicate that the approval is not model-specific;~~

~~(4) Include acceptance by the DAPIA of a quality assurance manual for on-site completion meeting the requirements of paragraph (e) of this section;~~

~~(5) Include the IPIA's written agreement to accept responsibility for completion of the necessary on-site inspections and accompanying records;~~

~~(6)Identify instructions authorized for completing the work on-site that meet the requirements of paragraph (f) of this section;~~

~~(7) Include the manufacturer's system for tracking the status of homes built under the approval until the on-site work and necessary inspections have been completed,to assure that the work is being performed properly;~~

~~(8) Include a quality control checklist to be used by the manufacturer and IPIA and approved by the DAPIA to verify that all required components, materials, labels, and instructions needed for site completion are provided in each home prior to shipment;~~

~~(9) Include an inspection checklist developed by the IPIA and manufacturer and approved by the DAPIA, that is to be used by the final site inspectors;~~

~~(10)Include a Consumer Information Notice developed by the manufacturer and approved by the DAPIA that explains the on-site completion process and identifies the work to be completed on-site; and~~

~~(11)Include any other requirements and limitations that the DAPIA deems necessary or appropriate to accomplish the purposes of the Act.~~

~~(e) Quality assurance manual for on-site completion requirements. The portion of the quality assurance manual for on-site completion required by paragraph (d)(3) of this section must receive the written concurrence of the manufacturer's IPIA with regard to its acceptability and applicability to the on-site completion of the affected manufactured homes. It must include a commitment by the manufacturer to prepare a final site inspection report that will be submitted to the IPIA for its review. When appropriate, this portion of the quality assurance manual for on-site completion will be deemed a change in the manufacturer's quality assurance manual for the applicable models, in accordance with §§3282.203 and 3282.361.~~

~~(f) Instructions for completion on-site. The DAPIA must include instructions authorized for completing the work on-site as a separate part of the manufacturer's approved design package. The manufacturer must provide a copy of these instructions and the inspection checklist required by paragraph (d)(9) of this section to the IPIA for monitoring and inspection purposes.~~

~~AUTHORITY~~

~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727,Sept. 8, 2015~~

~~§3282.604. DAPIA responsibilities.~~

~~The DAPIA, acting on behalf of HUD, for any manufacturer proceeding under this section is responsible for:~~

~~(a)Verifying that all information required by §3282.603 has been submitted by the manufacturer;~~

~~(b)Reviewing and approving the manufacturer's designs, quality control checklist, site inspection checklist, site completion instructions, and quality assurance manuals for site work to be performed;~~

~~(c)Maintaining all records and approvals for at least 5 years;~~

~~(d)Revoking or amending its approvals in accordance with §3282.609; and~~

~~(e) Reviewing its approvals under this section a tleast every 3 years or more frequently if there are changes made to the Manufactured Home Construction and Safety Standards, 24 CFR part 3280, to verify continued compliance with the Standards.~~

~~AUTHORITY~~

~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727,Sept. 8, 2015~~

~~§3282.605. Requirements applicable to completion of construction.~~

~~(a) Serial numbers of homes completed on-site. The serial number of each home completed in conformance with this section must include the prefix or suffix "SC".~~

~~(b) Labeling. A manufacturer that has received a DAPIA approval under §3282.604 may certify and label a manufactured home that is substantially completed in the manufacturer's plant at the proper completion of the in-plant production phase, even though some aspects of construction will be completed on-site in accordance with the DAPIA's approval. Any such homes or sections of such homes must have a label affixed in accordance with §3282.362(c)(2) and be shipped with a Consumer Information Notice that meets the requirements of §3282.606.~~

~~(c) Site inspection. Prior to occupancy, the manufacturer must ensure that each home is inspected on-site. The manufacturer is responsible for inspecting all aspects of construction that are completed on-site as provided in its approved designs and quality assurance manual for on-site completion.~~

~~(d) Site inspection report. (1) In preparing the site inspection report, the manufacturer must use the inspection checklist approved by the DAPIA in accordance with §3282.603(d)(9), and must prepare a final site inspection report and provide a copy to the IPIA within 5 business days of completing the report. Within 5 business days after~~

~~the date that the IPIA notifies the manufacturer of the IPIA's approval of the final site inspection report, the manufacturer must provide a copy of the approved report to the lessor or purchaser prior to occupancy and, as applicable, the appropriate retailer and any person or entity other than the manufacturer that performed the on-site construction work.~~

~~(2) Each approved final site inspection report must include:~~

~~(i) The name and address of the manufacturer;~~

~~(ii) The serial number of the manufactured home;~~

~~(iii) The address of the home site;~~

~~(iv) The name of the person and/or agency responsible for the manufacturer's final site inspection;~~

~~(v) The name of each person and/or agency who performs on-site inspections on behalf of the IPIA, the name of the person responsible for acceptance of the manufacturer's final on-site inspection report on behalf of the IPIA, and the IPIA's name, mailing address, and telephone number;~~

~~(vi) A description of the work performed on-site and the inspections made;~~

~~(vii) When applicable, verification that any problems noted during inspections have been corrected prior to certification of compliance; and~~

~~(viii)Certification by the manufacturer of completion in accordance with the DAPIA-approved instructions and that the home conforms with the approved design or, as appropriate under §3282.362(a)(1)(iii), the construction and safety standards.~~

~~(3) The IPIA must review each manufacturer's final on-site inspection report and determine whether to accept that inspection report.~~

~~(i)Concurrent with the manufacturer's final site inspection, the IPIA or the IPIA's agent must inspect all of the on-site work for homes completed using an approval under this section. The IPIA must use the inspection checklist approved by the DAPIA in accordance with §3282.603(d)(9).~~

~~(ii) If the IPIA determines that the manufacturer is not performing adequately in conformance with the approval, the IPIA must red tag and reinspect until it is satisfied that the manufacturer is conforming to the conditions included in theapproval. The home may not be occupied until the manufacturer and the IPIA have provided reports, required by this section, confirming compliance with the Construction and Safety Standards.~~

~~(iii) The IPIA must notify the manufacturer of the IPIA's acceptance of the manufacturer's final site inspection report. The IPIA may indicate acceptance by issuing its own final site inspection report or by indicating, in writing, its acceptance of the manufacturer's site inspection report showing that the work completed on-site is in compliance with the DAPIA approval and the Construction and Safety Standards.~~

~~(4) Within5 business days of the date of IPIA's notification to the manufacturer of the acceptance of its final site inspection report, the manufacturer must provide to the purchaser or lessor, as applicable, the manufacturer's final site inspection report. For purposes of establishing the manufacturer's and retailer's responsibilities under the Act and subparts F and I of this part, the sale or lease of the manufactured home will not be~~

~~considered complete until the purchaser or lessor, as applicable, has been provided with the report.~~

~~(c) Report to HUD. (1) The manufacturer must report to HUD through its IPIA, on the manufacturer's monthly production report required in accordance with §3282.552,the serial number and site completion numeric identification (see§3282.603(d)(1)) of each home produced under an approval issued pursuant to this section.~~

~~(2) The report must be consistent with the DAPIA approval issued pursuant to this section.~~

~~(3) The manufacturer must submit a copy of the report, or a separate listing of all information provided on each report for homes that are completed under an approval issued pursuant to this section, to the SAAs of the States where the home is substantially completed in the factory and where the home is sited, as applicable.~~

~~AUTHORITY~~

~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727,Sept. 8, 2015~~

~~§3282.606. Consumer information.~~

~~(a) Notice. Any home completed under the procedures established in this section must be shipped with a temporary notice that explains that the home will comply with the requirements of the construction and safety standards only after all of the site work has been completed and inspected. The notice must be legible and typed, using letters at least 1/4 inch high in the text of the notice and 3/4inch high for the title. The notice must read as follows:~~

~~IMPORTANTCONSUMER INFORMATION NOTICE~~

~~WARNING: DONOT LIVE IN THIS HOME UNTIL THE ON-SITE WORK HAS BEEN COMPLETED AND THEMANUFACTURER HAS PROVIDED A COPY OF THE INSPECTION REPORT THAT CERTIFIES THATTHE HOME HAS BEEN INSPECTED AND IS CONSTRUCTED IN ACCORDANCE WITH APPROVEDINSTRUCTIONS FOR MEETING THE CONSTRUCTION AND SAFETY STANDARDS.~~

~~This home has been substantially completed at the factory and certified as having been constructed in conformance with the Federal Manufactured Home Construction and Safety Standards when specified work is performed and inspected at the homesite. This on-site work must be performed in accordance with manufacturer's instructions that have been approved for this purpose. The work to be performed on-site is [insert description of all work to be performed in accordance with the construction and safety standards].~~

~~This notice may be removed by the purchaser or lessor when the manufacturer provides the first purchaser or lessor with a copy of the manufacturer's final site inspection report, as required by regulation. This final report must include the manufacturer's certification of completion. All manufactured homes may also be subject to separate regulations requiring approval of items not covered by the Federal Manufactured Home Construction and Safety Standards, such as installation and utility connections.~~

~~(b)Placement of notice in home. The notice required by paragraph (a) of this section must be displayed in a conspicuous and prominent location within the manufactured home and in a manner likely to assure that it is not removed until, or under the authorization of, the purchaser or lessor. The notice is to be removed only by the first purchaser or lessor. No retailer, installation or construction contractor, or other person may interfere with the required display of the notice.~~

~~(c)Providing notice before sale. The manufacturer or retailer must also provide a copy of the Consumer Information Notice to prospective purchasers of any home to which the approval applies before the purchasers enter into an agreement to purchase the home.~~

~~(d) When sale or lease of home is complete. For purposes of establishing the manufacturer's and retailer's responsibilities for on-site completion under the Act and subparts F and I of this part, the sale or lease of the manufactured home will not be considered complete until the purchaser or lessor, as applicable, has been provided with a copy of the final site inspection report required under §3282.605(d) and a copy of the manufacturer's certification of completion required under §3282.609(k) and (l). For 5 years from the date of the sale or lease of each home, the manufacturer must maintain in its records an indication that the final on-site inspection report and certification of completion has been provided to the lessor or purchaser and, as applicable, the appropriate retailer.~~

~~AUTHORITY~~

~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727,Sept. 8, 2015~~

~~§3282.607. IPIA responsibilities.~~

~~The IPIA ,acting on behalf of HUD, for any manufacturer proceeding under this section is responsible for:~~

~~(a) Working with the manufacturer and the manufacturer's DAPIA to incorporate into the DAPIA-approved quality assurance manual for on-site completion any changes that are necessary to ensure that homes completed on-site conform to the requirements of this section;~~

~~(b) Providing the manufacturer with a supply of the labels described in this section, in accordance with the requirements of §3282.362(c)(2)(i)(A);~~

~~(c)Overseeing the effectiveness of the manufacturer's quality control system for assuring that on-site work is completed to the DAPIA-approved designs, which must include:~~

~~(1)Verifying that the manufacturer's quality control manual at the installation site is functioning and being followed;~~

~~(2) Monitoring the manufacturer's system for tracking the status of each home built under the approval until the on-site work and necessary inspections have been completed;~~

~~(3)Reviewing all of the manufacturer's final on-site inspection reports; and~~

~~(4)Inspecting all of the on-site construction work for each home utilizing an IPIA inspector or an independent qualified third-party inspector acceptable to the IPIA and acting as the designee or representative:~~

~~(i) Prior to close-up, unless access panels are provided to allow the work to be inspected after all work is completed on-site; and~~

~~(ii) After all work is completed on-site, except for close-up;~~

~~(d)Designating an IPIA inspector or an independent qualified third-party inspector acceptable to the IPIA, as set forth under §3282.358(d), who is not associated with the manufacturer and is not involved with the site construction or completion of the home and is free of any conflict of interest in accordance with §3282.359, to inspect the work done on-site for the purpose of determining compliance with:~~

~~(1) The approved design or, as appropriate under §3282.362(a)(1)(iii), the Construction and Safety Standards; and~~

~~(2) The DAPIA-approved quality assurance manual for on-site completion applicable to the labeling and completion of the affected manufactured homes;~~

~~(e)Notifying the manufacturer of the IPIA's acceptance of the manufacturer's final site inspection report (see §3282.605(d)(3)(iii));~~

~~(f)Preparing final site inspection reports and providing notification to the manufacturer of its acceptance of the manufacturer's final site inspection report within 5 business days of preparing its report. The IPIA is to maintain its final site inspection reports and those of the manufacturer for a period of at least 5 years. All reports must be available for HUD and SAA review in the IPIA's central record office as part of the labeling records; and~~

~~(g)Reporting to HUD, the DAPIA, and the manufacturer if one or more homes has not been site inspected prior to occupancy or when arrangements for one or more manufactured homes to be site inspected have not been made.~~

~~AUTHORITY~~

~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727,Sept. 8, 2015~~

~~§3282.608. Manufacturer responsibilities.~~

~~A manufacturer proceeding under this section is responsible for:~~

~~(a)Obtaining DAPIA approval for completion of construction on-site, in accordance with §3282.603;~~

~~(b)Obtaining the IPIA's agreement to perform on-site inspections as necessary under this section and the terms of the DAPIA's approval;~~

~~(c)Notifying the IPIA that the home is ready for inspection;~~

~~(d) Paying the IPIA's costs for performing on-site inspections of work completed under this section;~~

~~(e) Either before or at the time on-site work commences, providing the IPIA with a copy of any applicable DAPIA-approved quality assurance manual for on-site completion, the approved instructions for completing the construction work on-site, and an approved inspection checklist, and maintaining this information on the job site until all on-site work is completed and accepted by the IPIA;~~

~~(f)Satisfactorily completing all on-site construction and required repairs or authorizing a licensed contractor or similarly qualified person to complete all site construction and any needed repairs;~~

~~(g)Providing a written certification to the lessor or purchaser, when all site construction work is completed, that each home, to the best of the manufacturer's knowledge and belief, is constructed in conformance with the Construction and Safety Standards;~~

~~(h)Ensuring that the consumer notification requirements of §3282.606 are met for any home completed under this subpart;~~

~~(i)Maintaining a system for tracking the status of homes built under the approval until the on-site work and necessary inspections have been completed, such that the system will assure that the work is performed in accordance with the quality control manual and other conditions of the approval;~~

~~(j)Ensuring performance of all work as necessary to assure compliance with the Construction and Safety Standards upon completion of the site work, including§3280.303(b) of this chapter, regardless of who does the work or where the work is completed;~~

~~(k)Preparing a site inspection report upon completion of the work on-site, certifying completion in accordance with DAPIA-approved instruction and that the home conforms with the approved design or, as appropriate under§3282.362(a)(1)(iii), the construction and safety standards;~~

~~(l)Arranging for an on-site inspection of each home upon completion of the on-sitework by the IPIA or its authorized designee prior to occupancy to verify compliance of the work with the DAPIA-approved designs and the Construction and Safety Standards;~~

~~(m)Providing its final on-site inspection report and certification of completion to the IPIA and, after approval, to the lessor or purchaser and, as applicable, the appropriate retailer, and to the SAA upon request;~~

~~(n) Maintaining in its records the approval notification from the DAPIA, the manufacturer's final on-site inspection report and certification of completion, and the IPIA's acceptance of the final site inspection report and certification, and making all such records available for review by HUD in the factory of origin;~~

~~(o)Reporting to HUD or its agent the serial numbers assigned to each home completed in conformance with this section and as required by §3282.552; and~~

~~(p)Providing cumulative quarterly production reports to HUD or its agent that include the site completion numeric identification number(s) for each home (see§3282.603(d)(1)); the serial number(s) for each home; the HUD label number(s)assigned to each home; the retailer's name and address for each home; the name ,address, and phone number for each home purchaser; the dates of the final site completion inspection for each home; and whether each home was inspected prior to occupancy.~~

~~(q)Maintaining copies of all records for on-site completion for each home, as required by this section, in the unit file to be maintained by the manufacturer.~~

~~AUTHORITY~~

~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727,Sept. 8, 2015~~

~~§3282.609. Revocation or amendment of DAPIA approval.~~

~~(a) The DAPIA that issued an approval or the Secretary may revoke or amend, prospectively, an approval notification issued under §3282.603. The approval may be revoked or amended whenever the DAPIA or HUD determines that:~~

~~(1) The manufacturer is not complying with the terms of the approval or the requirements of this section;~~

~~(2) The approval was not issued in conformance with the requirements of §3282.603;~~

~~(3) A home produced under the approval fails to comply with the Federal construction and safety standards or contains an imminent safety hazard; or~~

~~(4) The manufacturer fails to make arrangements for one or more manufactured homes to be inspected by the IPIA prior to occupancy.~~

~~(b) The DAPIA must immediately notify the manufacturer, the IPIA, and HUD of any revocation or amendment of DAPIA approval.~~

~~AUTHORITY~~

~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727,Sept. 8, 2015~~

~~§3282.610. Failure to comply with the procedures of this subpart.~~

~~In addition to other sanctions available under the Act and this part, HUD may prohibit any manufacturer or PIA found to be in violation of the requirements of this section from carrying out their functions of this Subpart in the future, after providing an opportunity for an informal presentation of views in accordance with §3282.152(f). Repeated infractions of the requirements of this section maybe grounds for the suspension or disqualification of a PIA under §§3282.355 and3282.356.~~

~~AUTHORITY~~

~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~

~~HISTORY~~

~~80 FR 53727,Sept. 8, 2015~~

~~§3282.611. Compliance with this subpart.~~

	~~If the manufacturer and IPIA, as applicable, complies with the requirements of this section and the home complies with the construction and safety standards for those aspects of construction covered by the DAPIA approval, then HUD will consider a manufacturer or retailer that has permitted a manufactured home approved for on-site completion under this section to be sold, leased, offered for sale or lease, introduced, delivered, or imported to be in compliance with the certification requirements of the Act and the applicable implementing regulations in this part 3282 for those aspects of construction covered by the approval.~~ ~~AUTHORITY~~ ~~28 U.S.C.2461 note; 42 U.S.C. 3535(d); 42 U.S.C. 5424.~~ ~~HISTORY~~ ~~80 FR 53727, Sept. 8, 2015~~
Reason:	The California Department of Housing and Community Development (Department) recommends repeal of Code of Federal Regulation, Title 24, Subtitle B, Chapter XX, Part 3282, Subpart M "On-Site Completion of Construction of Manufactured Homes" in its entirety. Subpart M is unnecessary, creates serious inconsistencies with the U.S.C., imposes costs that exceed benefits, and duplicates state inspections in states that provide installation inspections of new manufactured homes.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown Multiple inspectors will be required from IPIA for manufacturing completion and from California for installation approval. Costs for (final) inspections double or more due to this redundancy in site tasking. Increased costs also result from duplicative travel for out-of-state inspectors.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 196 - § 3280.208 Requirements for foam plastic thermal insulating materials	Date: 12/29/2017
Submitter:	Michael Zieman, Self
Requested Action:	Revise Text
Proposed Change:	**FOAMPLASTIC INSULATION REVISION TO 3280** I. Delete Interpretative Bulletin C-5-76 II. Revise3280.208 as follows: **3280.208 Requirements for foam plastic thermal insulating materials.** (a) **General**. Foam plastic thermal insulating materials ~~shall not be~~ used within the cavity of walls (not including doors), floors or ceilings or ~~be~~ exposed to the interior of the home ~~unless:~~ shall comply with the requirements of this section. Foam plastic insulation material exceeding 4 inches in thickness shall comply with208(a)(5). (1)**Foam Plastic Insulation Material Surface Burning Characteristics:** All foam plastic insulation materials and cores containing foam plastic insulation material used as a component in construction shall have a flame spread rating of 75 or less and a smoke-developed rating of 450 or less when tested in accordance with ASTM E 84 or UL 723 when tested at a maximum thickness and the maximum density intended for use. Loose-fill-type foam plastic insulation material shall be tested as board stock for the flame spread index and smoke developed index identified in this section. (2)**Up to 1 inch in thickness:** Unless otherwise allowed in 208(a)(4) or208(a)(5) foam plastic insulation material not exceeding 1 inch in thickness shall comply with the following: (i). Is protected by ~~an interior finish~~ a thermal barrier of 5/16 - inch minimum thickness gypsum board or equivalent thermal barrier material for all cavities where the material is to be installed, and ~~(1)The foam plastic insulating material~~ ~~(2)The foam plastic is used as a sheathing or siding backerboard, and it:~~ ~~(I)Has a flame spread rating of 75 or less and a smoke-developed rating of 450 or less (not including outer covering of sheathing);~~ ~~(ii)Does not exceed 3/8 -inch in thickness; and~~ (ii~~i~~)Is separated from the interior of the manufactured home by a minimum of 2inches of mineral fiber insulation or an equivalent thermal barrier~~; or~~. Exception: **Foam plastic siding exterior sheathing backer board.** The thermal barrier is not required where siding backer board foam plastic insulation material has a thickness of not more than 0.5 inch (12.7 mm) and a potential heat of not more than 2000 Btu per square foot (22 720 kJ/m2) when tested in accordance with NFPA 259 provided that: 1.The foam plastic insulation is separated from the interior of the building by not less than 2 inches (51 mm) of mineral fiber insulation; or

2.The foam plastic insulation has been tested in accordance with 208(a)(5)

~~(3)The foam plastic insulating material has been previously accepted by the Department for use in wall and/or ceiling cavities of manufactured homes, and it is installed in accordance with any restrictions imposed at the time of that acceptance; or~~

~~(4)The foam plastic insulating material has been tested as required for its location in wall and/or ceiling cavities in accordance with testing procedures described in the Illinois Institute of Technology Research Institute (IIT)Report, "Development of Mobile Home Fire Test Methods to Judge the Fire-Safe Performance of Foam Plastic Sheathing and Cavity Insulation, IITRI Fire and Safety Research Project J-6461, 1979" or other full-scale fire tests accepted by HUD, and it is installed in a manner consistent with the way the material was installed in the foam plastic test module. The materials must be capable of meeting the following acceptance criteria required for their location:~~

~~(I)Wall assemblies. The foam plastic system shall demonstrate equivalent or superior performance to the control module as determined by:~~

~~(A)Time to reach flashover (600 °C in the upper part of the room);~~

~~(B)Time to reach an oxygen (O2) level of 14% (rate of O2 depletion), a carbon monoxide (CO) level of 1%, a carbon dioxide (CO2) level of 6%, and a smoke level of 0.26 optical density/meter measured at 5 feet high in the doorway; and~~

~~(C)Rate of change concentration for O2, CO, CO2 and smoke measured 3 inches below the top of the doorway.~~

~~(ii)Ceiling assemblies. A minimum of three valid tests of the foam plastic system and one valid test of the control module shall be evaluated to determine if the foam plastic system demonstrates equivalent or superior performance to the control module. Individual factors to be evaluated include intensity of cavity fire (temperature-time) and post-test damage.~~

~~(iii)Post-test damage assessment for wall and ceiling assemblies. The overall performance of each total system shall also be evaluated in determining the acceptability of a particular foam plastic insulating material.~~

~~(b)All foam plastic thermal insulating materials used in manufactured housing shall have a flame spread rating of 75 or less (not including outer covering or sheathing) and a maximum smoke-developed rating of 450.~~

(3)**Over 1 inch in thickness:** Foam plastic insulating material greater than1 inch in thickness up to 4 inches in thickness shall comply with the following:

Unless otherwise allowed in 208(a)(4), foam plastic insulation material shall be separated from the interior of a building by a thermal barrier of not less than1/2-inch (12.7 mm) gypsum wallboard, 23/32-inch (18.2 mm) wood structural panel or a material that is tested in accordance with and meets the acceptance criteria of both the Temperature Transmission Fire Test and the Integrity Fire Test of NFPA 275.

(4) **Roofing.** The thermal barrier specified in Sections 208(a)(2)&(a)(3) is not required where the foam plastic in a roof assembly or under a roof covering is installed in accordance with the manufacturer's instructions and is separated from the interior of

	the building by tongue-and-groove wood planks or wood structural panel sheathing that is not less than 15/32 inch (11.9 mm) thick bonded with exterior glue, identified as Exposure 1 and with edges supported by blocking or tongue-and-groove joints or an equivalent material. The smoke-developed index for roof applications shall not be limited. (5)**Specific approval.** Foam plastic not meeting the requirements of 208(a)(1) through 208(a)(4) shall be specifically accepted on the basis of one of the following tests: FM 4880, UL 1040 or UL1715. Tests shall be based on the actual end-use configuration and shall be performed on the finished foam plastic insulation assembly in the maximum thickness intended for use. Assemblies tested shall include seams, joints and other typical details used in the installation of the assembly and shall be tested in the manner intended for use.
Reason:	Foam plastic insulation requirements have not been updated in nearly 50 years. The current requirements are based on interpretations of tests performed in the early 1970s. Those interpretations were carried out by a few select individuals and were never consensus based. The design of manufactured home and materials used in their construction have changed dramatically since the early 1970s and today are very similar to site-built homes. This proposal will: 1. Maintain the current restrictions on the use of foam plastic insulation materials up to 1 inch in thickness found in 3280.208 and IB C-5-76.. 2. Permit the use of foam plastic insulation materials over 1 inch in thickness following requirement similar to if not identical to those imposed by the IRC. 3. Allow industry and HUD to explore foam sheathing options that will lead to increased energy efficiency.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Proposed change will now increase cost. Proposal will allow construction that is higher in energy conservation while actually saving cost.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 197 - § 3282.404(a) Standard for egress windows and devices for use in manufactured homes	Date: 12/29/2017
Submitter:	Manuel Santana, Cavco Industries Inc.
Requested Action:	Delete Text
Proposed Change:	If a manufacturer makes a final determination of noncompliance ~~for an individual home (see§3282.412(b)) and a class of homes is not involved~~, no further action is needed by the manufacturer other than to keep a record of its determination as required by §3282.417
Reason:	Adds clarity that for a noncompliance there is no need to establish a class since there is no notification or correction required and the home along with all the components will function as intended.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	There will be no cost increase from this change
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 198 - § 3280.202 Definitions	Date: 12/29/2017
Submitter:	Lesli Gooch, Manufactured Housing Institute (MHI)
Requested Action:	Revise Text
Proposed Change:	Revise definition of manufactured home in section 3280.2 as follows: *Manufactured Home* means a structure, ~~transportable in one or more sections, which in the traveling mode, is eight body feet or more in width or forty body feet or more in length, or, when erected on site, is three hundred twenty or more square feet, and which is built on a permanent chassis and~~ designed to be used as a detached one or two family dwelling not more than three stories above grade plane in height, with or without a permanent foundation when connected to the required utilities, built in compliance with the Construction and Safety Standards promulgated under 42 U.S.C. §5403 and having a permanent label affixed to identify it as a manufactured home. ~~and includes the plumbing, heating, air-conditioning, and electrical systems contained therein. Calculations used to determine the number of square feet in a structure 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. This term includes all structures which meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to §3282.13 and complies with the standards set forth in part 3280. Nothing in this subsection should be interpreted to mean that a *manufactured home* necessarily meets the requirements of HUD's Minimum Property Standards (HUDHandbook4900.1) or that it is automatically eligible for financing under 12U.S.C. 1709(b).~~
Reason:	The law reflects the origin of manufactured housing in the United States: the trailer home. However, manufactured housing has changed dramatically since the first trailer homes were built, and the vast majority of manufactured homes sold today are moved exactly once: when they leave the dealer's lot. The laws regulating manufactured housing have failed to keep pace with dramatic changes in the manufactured housing industry. Modern manufactured housing has little in common with a trailer; instead, a manufactured home can be nearly indistinguishable from a traditional site-built house next door. Manufactured home units may be combined into clusters or stacks that include multiple stories, vaulted ceilings, and attached garages. Regulations first promulgated in 1976 by the U.S. Department of Housing and Urban Development require similar materials and construction standards as site-built housing, and the resulting life expectancy of a manufactured home is now the same as a comparable site-built model. About 75 percent of manufactured homes are located on land owned by the homeowner, and the average lot size for those homes is more than double the average for traditional site-built homes. (From The National conference of Commissioners on Uniform State Laws at http://www.uniformlaws.org/ActSummary.aspx?title=Manufactured%20Housing%20Act). Permanent Chassis are not necessary since the majority of Manufactured Homes are never relocated and could readily be relocated without a chassis using equipment available today.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal would not result in a cost increase.
Subcommittee Recommendation:	
MHCC Action:	

MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 199 - § 3280.4 Incorporation by reference	Date: 12/31/2017
Submitter:	Jeff Inks, Window and Door Manufacturers Association
Requested Action:	Revise Text
Proposed Change:	**3280.4 Incorporation by reference.** Revise as follows: ~~NWWDA—National Wood Window and Door Association, 1400 E. Toughy Avenue, suite G-54, Des Plaines, IL 60018~~ WDMA—Window and Door Manufacturers Association ~~[Previously known as the National Wood Window and Door Association, NWWDA]~~, ~~1400 East Touhy Avenue, Des Plaines, IL 60018~~ 2025 M Street, NW, Suite 800, Washington, DC20036
Reason:	NWWDA no longer exists. Address for WDMA needs to be corrected as noted and there is no need to maintain the "Previously known...." language as NWWDA became WDMA in 1985.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Editorial only.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 200 - § 3280.4 Incorporation by reference	Date: 12/31/2017
Submitter:	Jeff Inks, Window and Door Manufacturers Association
Requested Action:	Revise Text
Proposed Change:	**3280.4 Incorporation by reference.** Revise as follows: ~~NWWDA—National Wood Window and Door Association, 1400 E. Toughy Avenue, suite G–54, Des Plaines, IL 60018~~ WDMA—Window and Door Manufacturers Association ~~[Previously known as the National Wood Window and Door Association, NWWDA]~~, ~~1400 East Touhy Avenue, Des Plaines, IL 60018~~ 2025 M Street, NW, Suite 800, Washington, DC20036
Reason:	NWWDA no longer exists. Address for WDMA needs to be corrected as noted and there is no need to maintain the "Previously known...." language as NWWDA became WDMA in 1985.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Editorial only.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 201 - § 3280.304 Materials		Date: 12/31/2017
Submitter:	Jeff Inks, Window and Door Manufacturers Association	
Requested Action:	Revise Text	
Proposed Change:	**§ 3280.304 Materials.** Update ANSI/AAMA/NWWDA 101/I.S.2-97 as follows: (b)(1) Standards for some of the generally used materials and methods of construction are listed in the following table: Wood and Wood Products ~~Voluntary Specifications for Aluminum, Vinyl (PVC) and Wood Windows and Glass Doors—ANSI/AAMA/NWWDA 101/I.S.2–97~~ North American Fenestration Standard/Specification for windows, doors, and skylights – AAMA/WDMA/CSA101/I.S.2/A440-11 NAFS 2017.	
Reason:	The current reference standard is significantly outdated and has been revised several times since the 1997 edition. The MHCSS should be referencing the latest edition accordingly.	
Substantiating Documents:	No	
Additional Cost:	Unknown	
Cost Benefit Explanation:	Unknown - Potentially if home manufacturers are not using fenestration products meeting the provisions of the current standard.	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	Received by Secretariat	
Log History:		

Log 202 - § 3280.403 Requirements for windows, sliding glass doors, and skylights	Date: 12/31/2017
Submitter:	Jeff Inks, Window and Door Manufacturers Association
Requested Action:	Revise Text
Proposed Change:	**3280.403 Standard for windows and sliding glass doors used in manufactured homes.** Update AAMA standard 1701.2-95 as follows: Section 3280.403 (b) *Standard*. All primary windows and sliding glass doors shall comply with ~~AAMA1701.2–95, Voluntary Standard Primary Window and Sliding Glass Door for Utilization in Manufactured Housing~~ AAMA 1701.2-17, Voluntary Standard for Utilization in Manufactured Housing for Primary Windows and Sliding Glass Doors, except the exterior and interior pressure tests must be conducted at the design wind loads required for components and cladding specified in §3280.305(c)(1). Section 3280.403 (e) *Certification*. All primary windows and sliding glass doors to be installed in manufactured homes must be certified as complying with AAMA 1701.2– ~~95~~17. This certification must be based on tests conducted at the design wind loads specified in § 3280.305(c)(1). Section 3280.403 (e) *Certification*.(2) In determining certifiability of the products, an independent quality assurance agency shall conduct preproduction specimen tests in accordance with AAMA1701.2~~–95~~17. Further, such agency must inspect the product manufacturer's facility at least twice per year.
Reason:	The current reference to the 1995 edition is significantly outdated as the standard has revised several times since the 1997 edition. The MHCSS should be referencing the latest edition accordingly.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown - Potentially if home manufacturers are not using fenestration products meeting the provisions of the current standard.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 203 - § 3280.404 Standard for egress windows and devices for use in manufactured homes	Date: 12/31/2017
Submitter:	Jeff Inks, Window and Door Manufacturers Association
Requested Action:	Revise Text
Proposed Change:	**3280.404 Standard for egress windows and devices for use in manufactured homes.** Update AAMA standard 1701.2-95 and AAMA standard 1704-85 as follows: Section 3280.404 (b) *Performance*. Egress windows including auxiliary frame and seals, if any, shall meet all requirements of ~~AAMA 1701.2–95, Voluntary Standard Primary Window and Sliding Glass Door for Utilization in Manufactured Housing~~ AAMA1701.2-17, Voluntary Standard for Utilization in Manufactured Housing for Primary Windows and Sliding Glass Doors and ~~AAMA Standard 1704–1985, Voluntary Standard Egress Window Systems for Utilization in Manufactured Housing~~ AAMA1701.2-17, Voluntary Standard Egress Window Systems for Utilization in Manufactured Housing, except the exterior and interior pressure tests for components and cladding must be conducted at the design wind loads required by §3280.305(c)(1). Section 3280.404 (e) *Certification of egress windows and devices*. Egress windows and devices shall be listed in accordance with the procedures and requirements of AAMA Standard 1704~~–1985~~17.As of January 17, 1995, this certification must be based on tests conducted at the design wind loads specified in § 3280.305(c)(1).
Reason:	The current reference to the 1995 edition is significantly outdated as the standard has revised several times since the 1995 edition. The MHCSS should be referencing the latest edition accordingly.
Substantiating Documents:	
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown - Potentially if home manufacturers are not using fenestration products meeting the provisions of the current standard.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 204 - § 3280.405 Standard for swinging exterior passage doors for use in manufactured homes	Date: 12/31/2017
Submitter:	Jeff Inks, Window and Door Manufacturers Association
Requested Action:	Revise Text
Proposed Change:	**Section 3280.405 Standard for swinging exterior passage doors for use in manufactured homes.** Update AAMA standard 1702.2-95 as follows: Section 3280.405 (b) *Performance requirements*. The design and construction of exterior door units must meet all requirements of ~~AAMA 1702.2–95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing~~ AAMA 1702.2-17, Voluntary Standard for Utilization in Manufactured Housing for Swinging Exterior Passage Doors. Section 3280.405 (e) *Certification*. All swinging exterior doors to be installed in manufactured homes must be certified as complying with ~~AAMA 1702.2–95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing~~ AAMA1702.2-17, Voluntary Standard for Utilization in Manufactured Housing for Swinging Exterior Passage Doors. Section 3280.405 (e) (2)In determining certifiability of the products, an independent quality assurance agency must conduct a preproduction specimen test in accordance with ~~AAMA1702.2–95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing~~ AAMA 1702.2-17, Voluntary Standard for Utilization in Manufactured Housing for Swinging Exterior Passage Doors.
Reason:	The current reference to the 1995 edition is significantly outdated as the standard has revised several times since the 1995 edition. The MHCSS should be referencing the latest edition accordingly.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown - Potentially if home manufacturers are not using exterior door products meeting the provisions of the current standard.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 205 - § 3280.508 Heat loss, heat gain and cooling load calculations	Date: 12/31/2017
Submitter:	Jeff Inks, Window and Door Manufacturers Association
Requested Action:	Revise Text
Proposed Change:	**3280.508 Heat loss, heat gain and cooling load calculations.** Update AAMA standard 1503.1-88, NFRC 100-97, and AHSRAE Handbook of Fundamentals 1997 as follows: Section 3280.508 (e) U values for any glazing (e.g., windows, skylights, and the glazed portions of any door) must be based on tests using AAMA 1503~~.1–1988~~ 09, Voluntary Test Method for Thermal Transmittance and Condensation Resistance of Windows, Doors, and Glazed Wall Sections, or the National Fenestration Rating Council 100, ~~1997~~2017 Edition, Procedure for Determining Fenestration Product U-factors. In the absence of tests, manufacturers are to use the residential window U values contained in Chapter ~~29,Table 5~~ F-15 of the ~~1997~~2017 ASHRAE Handbook of Fundamentals, Inch-Pound Edition. In the event that the classification of the window type is indeterminate, the manufacturer must use the classification that gives the higher U value. Where a composite of materials from two different product types is used, the product is to be assigned the higher U value. For the purpose of calculating U values, storm windows are treated as an additional pane.
Reason:	The current reference to the editions of these standards are significantly outdated as they have been revised several times since the respective current reference edition. The MHCSS should be referencing the latest editions of these standards accordingly.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown - Potentially if home manufacturers are not using fenestration products meeting the provisions of the current standards.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log 206 - § 3280.403 Requirements for windows, sliding glass doors, and skylights	Date: 12/31/2017
Submitter:	Jeff Inks, Window and Door Manufacturers Association
Requested Action:	Revise Text
Proposed Change:	**3280.403 Standard for windows and sliding glass doors used in manufactured homes.** (d) *Glass*. (1)Safety glazing materials, where used, shall meet ~~ANSI Z97.1–1984, ''Safety Performance Specifications and Methods of Test for Safety Glazing Materials Used in Buildings.''~~ ANSI Z97.1—2014: Safety Glazing Materials Used in Buildings—Safety Performance Specifications and Methods of Test.
Reason:	The current reference standard is significantly outdated and has been revised several times since the 1984 edition. The MHCSS should be referencing the latest edition accordingly.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown - Potentially if home manufacturers are not using fenestration products meeting the provisions of the current standard.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Deregulation Comments from FR 6030-N-01 (HSG)

DRC # 1 – FR6030-N-01 – Regulatory	Date: 6/13/2017
Submitter:	Soheyla Kovach
Comment:	1) The solution to the affordable housing crisis can in many cases be accelerated by using HUD code manufactured homes, the enhanced preemption of the Manufactured Housing Improvement Act of 2000 (MHIA 2000). Certainly preserving existing housing and other factors are needed too, but manufactured homes ought to be front and center. 2) Enforcement of the law (MHIA 2000) and draining the swamp at HUD's program management are essential. 3) MHI ought not to be trusted, see the above, as they have allegedly worked in collusion with HUD and others to the detriment of independent businesses and producers. 4) Educate those in the program about the realities linked above. Understanding of the realities of the product vs. the history from the mobile home era. Enforcing the law. Leveling the playing field. Draining the swamp at HUD. Don't allow back-handed, alleged de-facto collusion between MHI and HUD (or other agencies). Do those things, and the manufactured home program will thrive. Millions will buy. Millions of jobs will be created. The federal budget for HUD and affordable housing programs will naturally be reduced over time, thanks to the work of the free market. To paraphrase Mark Weiss from MHARR said, set manufactured housing free. The industry is not asking for handouts. We want to be regulated, that's to the benefit of consumers and honest industry builders. But make that regulation reasonable and per the MHIA 2000 law, not regulatory overreaches that harm independents to the advantage of larger operations.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 2 – FR6030-N-01 – 75 CFR 5888	Date: 6/7/2017
Submitter:	Mark Weiss, Manufactured Housing Association for Regulatory Reform
Comment:	2010 Interpretive Rule Regarding Matters Subject to MHCC Review Both the plain language of the relevant provisions and the structure of section 604 show that section 604(b)(6) was designed to ensure an opportunity for MHCC consensus comment and review or comment. HUD, accordingly, has misconstrued the law and unlawfully limited the role of the MHCC as envisaged by Congress. As a result, HUD's February 5, 2010 "Interpretive Rule," which unlawfully negates section 604(b)(6) of the 2000 reform law, is a regulatory action that should be repealed pursuant to EO 13777.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 3 – FR6030-N-01 – HUD Statute		Date: 6/13/2017
Submitter:	Kim Longwell	
Comment:	As the above examples demonstrate, HUD has strayed from statute when it comes to regulating manufactured housing. HUD's actions have come at the expense of fostering innovation and supporting affordable housing for consumers. HUD should instead be highlighting best practices and supporting states in their regulatory efforts.	
Statutory:	No	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Reason:		
Cost Impact Explanation:		
Current Status:	Received by Secretariat.	
DRC History:		

DRC # 4 – FR6030-N-01 – 24 CFR part 3282 Subpart M	Date: 6/14/2017
Submitter:	Malone Oats
Comment:	Burdensome and Unnecessary On-Site Completion of Construction Rule (24 CFR Part 3282 Subpart M) – The On-Site Completion of Construction Rule, which went into effect in the fall of 2016, established extensive new requirements for the on-site completion of construction of manufactured homes. The rule covers many consumer-preferred amenities, such as French doors. In finalizing the rule, HUD did not assess the costs associated with the expanded design approval and inspection requirements for homes that are substantially complete when they leave the factory. MHI estimates that the rule impacts as many as ten to fifteen percent of all new homes produced, with a cost to the industry that could be as much as $7 to $10.5 million. This cost does not include one-time design reviews for each site-construction labeled home, nor does it include increased costs to track inspections and keep records. While HUD issued numerous clarifications to ease compliance, consumers are being negatively impacted because manufacturers are no longer offering consumer popular amenities if they fall under the scope of the rule.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 5 – FR6030-N-01 – CFR part 3282 Subpart I		Date: 6/14/2017
Submitter:	John Weldy	
Comment:	CFR Part 3282 SubPart I 3282 Subpart I should be deleted without replacement as it is excessively burdensome and inappropriate application for the home building industry. In 1974 when the National Manufactured Housing Construction and Safety Standards Act of 1974 was written into law, manufactured homes were vehicle-like "trailers" and Subpart I regulations may have been appropriate. However, the standard has failed to keep up with the industry as manufactured homes have transitioned into full-fledged housing which is built in an indoor controlled facility.	
Statutory:	No	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Reason:		
Cost Impact Explanation:		
Current Status:	Received by Secretariat.	
DRC History:		

DRC # 6 – FR6030-N-01 – 24 CFR 3288	Date: 6/6/2017
Submitter:	Amy Bliss, Wisconsin Housing Alliance
Comment:	Eliminate the very costly Dispute Resolution Process: This process is very costly and has only administered a very minimal number of complaints. Taxpayer funding is not well spent on this program.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 7 – FR6030-N-01 – Regulatory 42 USC 5404	Date: 6/7/2017
Submitter:	Mark Weiss, Manufactured Housing Association for Regulatory Reform
Comment:	Federalization of Installation Now, HUD—through a double-edged process—is attempting to effectively federalize manufactured home installation regulation in all 50 states and thereby nullify the federal-state partnership that lies at the core of the HUD program as envisaged by Congress. In one part of this process, HUD . . . is attempting to use the State Plan approval and re-certification process to override and replace—or compel state officials to revise, modify, and replace—state-adopted installation standards in complying states, based upon the "equal or greater protection" language of the 2000 law. In the second part of this process, HUD has asserted—for the first time since the inception of installation regulation under the 2000 reform law—that new HUD interpretations of the federal installation standards for default states are binding, not only in those default states, but in states with compliant state-law installation standards and programs. Pursuant to this scheme to undermine state authority as specifically incorporated within the 2000 reform law, HUD has proposed—and presented to the MHCC—a supposed "Interpretative Bulletin" that, in fact, would substantively modify provisions of the federal installation standards for default states regarding manufactured home foundations in freezing climates. MHARR has directly and strenuously objected to both of these actions as a blatant abuse of HUD's authority and has called for both actions to be halted. HUD's intentional distortion and misapplication of the installation mandate of the 2000 reform law—seeking to undermine, restrict and ultimately abolish the legitimate role and authority of the states as established by Congress, will result in significant harm for the industry and consumers, and impose needless and excessive regulatory compliance costs. Accordingly, both elements of this effort to negate state installation authority should be terminated pursuant to EO 13777.
Statutory:	Yes
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 8 – FR6030-N-01 – 24 CFR 3280.309	Date: 6/7/2017
Submitter:	Mark Weiss, Manufactured Housing Association for Regulatory Reform
Comment:	Formaldehyde Warning Notice Although HUD-regulated manufactured homes utilize the same construction materials as site-built and other types of homes and, unlike site-built and other types of homes, have been subject to stringent and effective formaldehyde emissions standards since 1984, HUD standards include a discriminatory requirement that each manufactured home . . . "prominently" display a red formaldehyde "Health Notice." This notice requirement has been maintained by HUD for over 3 decades, despite the fact that: (1) the substantive HUD formaldehyde emissions standards have been successful in eliminating the vast majority of formaldehyde-related complaints by homeowners; and (2) the red formaldehyde "Health Notice" negatively impacts the marketability of manufactured homes despite the fact that both manufactured and site-built homes are constructed of exactly the same materials. With HUD statistics indicating minimal levels of formaldehyde-related consumer complaints in federally regulated manufactured homes, there is no longer any basis or justification for the health notice mandated by the HUD standards, and the regulation requiring that notice for manufactured homes should be repealed.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 9 – FR6030-N-01 – 24 CFR part 3282.11	Date: 6/13/2017
Submitter:	John Kapp
Comment:	Guidelines on Alternative Construction (24 CFR Part 3282.11) - The HUD Code provides for an Alternative Construction (AC) process whereby manufacturers can provide designs that conflict with existing regulations (e.g. handicap accessible showers, two story homes) if manufacturers and their third-party design inspectors can demonstrate that the proposed design meets or exceeds HUD Code standards. In 2014, HUD issued guidance that clarified that site-built additions such as attached garages and enclosed porches would require AC approval. While the industry has lived with the guidance, the requirements are clear overreach and should be reversed. Earlier this year, HUD arbitrarily expanded the scope of the guidance to include carport ready homes, which are fully code compliant when they leave the factory. Carport ready homes have been a staple of manufactured housing for decades. In addition, the requirement for several items to require AC letters due to the failure to update the standards (e.g. roll in showers, whole house ventilation for homes over a certain size) stifles innovation and limits consumer choice.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 10 – FR6030-N-01 – Interpretive Bulletin	Date: 6/14/2017
Submitter:	John Weldy
Comment:	HUD issued a letter on May 10,2017 which dramatically changed the regulations and enforcement concerning site installed carports and awnings , This HUD letter is one of many examples of over reach in which HUD has dramatically changed regulations without going through proper rule making process. Particularly the 24 CFR Part 3282.7(b) defines Add-on as any structure (except a structure designed or produced as an integral part of a manufactured home) which, when attached to the basic home unit, increases the area, either living or storage of the manufactured home. A carport or attached awning isn't an integral part of the home nor does it increase the area of the home since it's not part of the home or it's conditioned space. Even if HUD feels carports/awning somehow add to the homes storage or living area thereby per 3282.7(b) definition should be classified as an "add-on"; these "add-on" are not required to be built under the Alternative Construction (AC) process per the regulations.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 11 – FR6030-N-01 – 24 CFR part 3286.803	Date: 6/13/2017
Submitter:	Richard Freedman
Comment:	HUD's oversight, and its current rules and regulations, are negatively impacting families who view these homes as an affordable housing option. I would like to call HUD's attention to the regulatory burdens of Installation Programs (24 CFR Part 3286.803). HUD has initiated efforts to regulate the installation of all homes in areas of the country susceptible to frost and frost heave, regardless of the presence of State Administrative Agencies. HUD is effectively limiting the ability of states to administer their own installation programs. HUD's intrusion into a system that is working with a one-size-fits-all approach is unnecessary and burdensome. This is an example of clear overreach by HUD, and is clearly beyond its authorities in the HUD Code.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 12 – FR6030-N-01 – Manufactured Housing Requirements	Date: 6/14/2017
Submitter:	Shameka Wiley, National Fire Protection Association
Comment:	In addition, HUD should address the manufactured housing requirements. While serving from as the administrating organization for HUD's Manufactured Housing Consensus Committee from 2001 to 2014, NFPA has witnessed firsthand the challenges faced by HUD in keeping pace with the private sector. HUD requirements for manufactured housing are not consistent with similar provisions for other types of single-family dwellings and in some cases are behind modern era construction techniques and technologies by 10 years or more. Due to the statutory requirements of the Manufactured Housing Improvement Act of 2000, reforming this program may require more than agency action alone. However, NFPA would urge HUD to explore ways to enable more timely updates to manufactured housing requirements, particularly through the incorporation by reference of voluntary consensus standards.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 13 – FR6030-N-01 – 24 CFR Part 3286.803	Date: 6/5/2017
Submitter:	Dave Baioni and Rob Shouhayib John Kapp
Comment:	Installation Programs (24 CFR Part 3286.803) -The regulation of the installation of manufactured homes is intended to be done at the state and local level. Despite this, HUD has initiated efforts to regulate the installation of all homes in areas of the country susceptible to frost and frost heave, regardless of the presence of State Administrative Agencies. HUD is effectively limiting the ability of states to administer their own installation programs. HUD's intrusion into a system that is working with a one-size-fits-all approach is unnecessary and burdensome. This is an example of clear overreach by HUD, and is clearly beyond its authorities in the HUD Code.
Statutory:	Y (Dave Baioni and Rob Shouhayib) N (John Kapp)
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 14 – FR6030-N-01 – 24 CFR part 3286.803	Date: 6/14/2017
Submitter:	Lesli Gooch
Comment:	Intrusive Installation Programs (24 CFR Part 3286.803) – While the statute provides that HUD is the primary regulator of the design and construction of manufactured homes inside the factory, the regulation of the installation of the homes is intended to be done at the state and local level. State administrative agencies are tasked with ensuring that installations comply with manufacturer standards and are appropriate for local conditions. MHI is concerned that recent actions by HUD are an effort to usurp state and local authority so it can regulate the installation of manufactured homes at the federal level. Recently, HUD has initiated efforts to regulate the installation of all homes in areas of the country susceptible to frost and frost heave, regardless of the presence of state administrative agencies. Without clear evidence that installation systems are failing, HUD is effectively limiting the ability of states to administer their own installation programs. In states like Maine, Wisconsin, and New York, approved installation practices have been administered for years at the state level and have no instances of failures. The recent "polar vortex" winters, with no resulting instances of installation failures, demonstrates that this process is working. HUD is effectively limiting the ability of states to administer their own installation programs. HUD's intrusion into a system that is working with a one-size-fits-all regulatory approach is unnecessary and burdensome. This is an example of clear overreach by HUD, and is clearly beyond its authority in statute.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 15 – FR6030-N-01 – 24 CFR 3285.312	Date: 6/14/2017
Submitter:	Dale Azaria, Vermont Department of Housing and Community Development Linda Thompson Sarah Carpenter, Vermont Housing Finance Agency
Comment:	Modify the regulations regarding the installation of mobile homes, 24 CFR Part 3285: HUD's regulations for the installation of manufactured homes, particularly the foundation installation requirements of 24 CFR 3285.312, are unduly onerous. Foundations must be designed by a licensed engineer or architect, approved by the DAPIA and manufacturer. These requirements add significant cost to what should be an affordable form of housing, particularly the requirements that apply in freezing climates. It is our understanding from talking with the industry here in Vermont that having the foundation / slabs designed by an engineer with knowledge of Vermont's climate and soils would be more than adequate. It is also our understanding that HUD uses a 100-year average air freezing index, which results in excessive insulation requirements. At a minimum, more recent data should be used. This regulation is unnecessary. It also imposes costs that exceed benefits.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 16 – FR6030-N-01 – Interpretive Bulletin	Date: 6/14/2017
Submitter:	John Weldy
Comment:	On 6/12/14 HUD released a guidance letter demanding that Free standing site-built garage must get HUD AC approval. The overwhelming majority of single family detached homes built in the United States have an attached garage or carport. For manufactured homes, an attached garage or carport is constructed on-site by a licensed general contractor of the homeowner's choosing. The jurisdiction for garage and carport designs, construction, building permits, and inspections falls under the authority of the state, county, city, or local building code official where the home will be placed. For decades, this process has worked extremely well and without incident. Manufactured home builders have been permitted to provide their customers with instructions and requirements for attaching site-attached structures to manufactured homes. In my 23 years in this industry, I have never heard of single issue or problem with this practice. Recently however, HUD ruled that manufactured home builders were no longer permitted to allow this practice without special written permission from the department, in advance, for every home design to be constructed with a site attached garage or carport. This new requirement unnecessarily adds significant cost to the consumer, delays occupancy for the homeowner, adds no value, and should be eliminated immediately.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 17 – FR6030-N-01 – 24 CFR 3828 subpart M	Date: 6/7/2017
Submitter:	Mark Weiss, Manufactured Housing Association for Regulatory Reform
Comment:	On-Site Completion of Construction (24 CFR 3828 subpart M) ...the on-site construction rule adopted by HUD, rather than enhancing the ability of affordable manufactured homes to compete with site-built structures within the free market, instead stymies any such competition by subjecting manufactured homes to excessive, discriminatory mandates. As a result, it unnecessarily constrains the affordable housing choices available to Americans, it unnecessarily constrains the growth and evolution of the manufactured housing industry and, as a result unnecessarily inhibits job growth within the manufactured housing industry, contrary to EO 13777. The existing rule, therefore, should be repealed and replaced with a new rule that comports with the recommendations of the MHCC and provides for the on-site completion of manufactured homes in accordance with the federal standards with a minimum of additional regulatory compliance burdens.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 18 – FR6030-N-01 – 24 CFR part 3282 Subpart M	Date: 6/5/2017
Submitter:	Dave Baioni and Rob Shouhayib John Kapp
Comment:	On-Site Completion of Construction Rule (24 CFR Part 3282 Subpart M) - The On-Site Rule, which went into effect in September of 2016, established extensive new requirements for the on-site completion of construction of manufactured homes. When finalizing the rule, HUD did not assess the costs associated with the expanded design approval and inspection requirements for homes that are substantially complete when they leave the factory. While HUD has issued numerous clarifications to ease compliance, consumers are negatively impacted because manufacturers are no longer offering popular amenities. Although some at HUD might believe that implementation of the rule is going well, the rule harms consumer choice and negatively impacts the manufactured housing industry by unnecessarily limiting the opportunity for manufacturers to incorporate features into homes that meet consumer demand.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 19 – FR6030-N-01 – Outdated Regulations	Date: 6/14/2017
Submitter:	Lesli Gooch
Comment:	Outdated Regulations (24 CFR parts 3280, 3282, 3284, 3285, 3286, 3288, and 3800) – The HUD Code ("Code") should be revised and updated more frequently to ensure the Code reflects innovation in the industry and minimizes costly regulatory review and compliance requirements. HUD's emphasis should be shifted from the promulgation of rules and guidance - such as that currently contemplated for manufactured home installations in frost susceptible soils - to highlighting best practices and supporting regulatory flexibility.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 20 – FR6030-N-01 – 42 U.S.C. 5412 et al	Date: 6/6/2017
Submitter:	Amy Bliss, Wisconsin Housing Alliance Lesli Gooch
Comment:	Reduce Unnecessary Paperwork Burdens(24 CFR Part 3282 Subpart I): HUD's imposition of unnecessary compliance burdens is best exemplified by its misplaced application of the "lemon law" to manufactured homes. These requirements, contained in the HUD Procedural and Enforcement Regulations, have generated significant paperwork burdens. Subpart I of the HUD Code stems from the "lemon law" language in the "Magnusson-Moss Warranty Act of 1974" which, through the MHCSS, applies to manufactured homes. While this provision is meant to correct defects, the language does not apply to site-built homes and is more suited to automobiles. Like site-built homes, these issues can be addressed through home warranties. The key challenges with Subpart I and HUD's implementation of this provision are the voluminous procedures, checklists, and guidance documents that HUD's enforcement partners are required to utilize. HUD's monitoring and compliance efforts should focus on areas where there is empirical evidence that a problem exists. Significant paperwork, recordkeeping and overlapping federal compliance requirements could be substantially reduced if HUD would undertake a sincere effort to reduce paperwork and defer to state regulatory and administrative agencies on matters of consumer complaints.
Statutory:	Y (Amy Bliss) N (Lesli Gooch)
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 21 – FR6030-N-01 – Energy Independence and Security Act, Pub. L. 110–140 (2007)		Date: 6/14/2017
Submitter:	Lesli Gooch	
Comment:	Regulatory Overlap with the Department of Energy – The 2007 Energy Independence and Security Act mandated that manufactured housing meet higher energy efficiency standards. When the Department of Energy (DOE) proposed a rule last year to implement this provision, it failed to adequately assess the impact the associated cost increase would have on consumers, nor did it confer with HUD in developing a clear compliance path to avoid overlapping regulations and ensure clarity. The proposed rule would have increased manufactured home prices between 3 and 10 percent, while producing negligible cost savings for consumers. MHI strongly believes HUD should have exclusive jurisdiction over all manufactured housing construction standards, including standards for energy efficiency.	
Statutory:	Y	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Reason:		
Cost Impact Explanation:		
Current Status:	Received by Secretariat.	
DRC History:		

DRC # 22 – FR6030-N-01 – Formaldehyde Notices		Date: 6/6/2017
Submitter:	Amy Bliss, Wisconsin Housing Alliance	
Comment:	Remove the requirement for consumer formaldehyde notices.	
Statutory:	Y	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Reason:		
Cost Impact Explanation:		
Current Status:	Received by Secretariat.	
DRC History:		

DRC # 23 – FR6030-N-01 – 24 CFR part 3282	Date: 6/14/2017
Submitter:	Lesli Gooch
Comment:	Shift Emphasis from Regulating to Highlighting Best Practices: As the above examples demonstrate, HUD has strayed from statute when it comes to regulating manufactured housing. HUD's actions have come at the expense of fostering innovation and supporting affordable housing for consumers. In the cases cited above, HUD could have met its public policy objectives of ensuring adherence to appropriate on-site and installation standards by highlighting best practices and supporting states in their regulatory efforts.
Statutory:	Y
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 24 – FR6030-N-01 – 24 CFR Part 3282	Date: 6/14/2017
Submitter:	Lesli Gooch
Comment:	Shifting Guidelines on Alternative Construction (24 CFR Part 3282.11) – The HUD Code provides for an Alternative Construction (AC) process whereby manufacturers can provide additional consumer amenities, such as enclosed garages, second floors, and enclosed porches, if manufacturers and their third-party design inspectors can demonstrate that the proposed design meets or exceeds HUD Code standards. In a June 2014 guidance letter, HUD cited 24 CFR 3282.7 in defining an "Add On" as "any structure (except a structure designed or produced as an integral part of a manufactured home) which when attached to the basic manufactured home unit, increases the area, either living or storage, of the manufactured home." HUD's examples of such structures include: "garages, family rooms, sun rooms, enclosed decks, etc." and would require Alternative Construction approval. MHI continues in its belief that requiring Alternative Construction approval for homes that are in compliance with the standards when they leave a manufacturer's production facility is inconsistent with the letter, intent and purpose of 24 C.F.R. 3282.14. To make matters worse, just this year HUD has arbitrarily expanded the interpretation of the 2014 guidance letter to include designs of carport ready homes. MHI does not agree with HUD's findings and does not believe the regulation of carports by HUD is warranted or appropriate under statute and current regulations. A carport does not meet any of the above-mentioned criteria or descriptions of an "Add On" as contained within the regulations or guidance memos. Carports are not used for storage; they are free standing and merely attached to the roof by a support beam calibrated to withstand the extra weight. Carports also do not provide additional living space. Since carports are free standing structures, attached only at the roof, any issues regarding ventilation, egress, etc., simply do not apply. Furthermore, carport-ready homes have been a staple of the industry for decades. MHI believes the inclusion of carport in the definition of "Add On" is inconsistent with the scope of the guidance memo, is contradictory to the HUD Code, creates an unnecessary and time-consuming hurdle to the production of manufactured homes, and negatively impacts the availability of this feature that is extremely popular and sought after by consumers. MHI believes that HUD has changed regulation without going through a proper rulemaking process. Current HUD code standards and regulations already provide direction on designing and installing a home to accommodate an attached carport or awning. Manufacturers already design and construct such homes in accordance with the regulations. The latest HUD letter on carports is, in MHI's opinion, a misinterpretation of current regulations and directly contradicts current regulations. Further, because of the lack of any advance notification, grace period, or public comment period, there are currently manufactured housing plants with tens of millions of dollars of backlogged orders as a result of the unexpected new requirement by HUD. This is a significant, and abrupt, change with an extremely negative impact on manufacturers, dealers, and most importantly low-income homeowners. MHI urges HUD to reconsider and rescind this interpretation immediately.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 25 – FR6030-N-01 – 42 USC 5403	Date: 6/6/2017
Submitter:	Amy Bliss, Wisconsin Housing Alliance
Comment:	Streamline and Update the HUD Code in a Timely Manner. The HUD Code should be revised and updated more frequently to ensure it reflects innovation in the industry and minimizes costly regulatory review and compliance requirements. HUD's emphasis should be shifted from the promulgation of rules and guidance - such as that currently contemplated for manufactured home installations in frost susceptible soils - to highlighting best practices and supporting regulatory flexibility. The ability to utilize new technologies and materials and to maintain the integrity of the uniform single building Code is dependent on a Code that is current. Recognizing this, in 2000, Congress passed the Manufactured Housing and Improvement Act (MHIA), which expanded HUD's mission regarding manufactured housing and improved the process for establishing, revising, enforcing and updating the HUD Code. The law created the Manufactured Housing Consensus Committee (MHCC), an advisory committee comprised of industry, consumer and other stakeholders to recommend revisions and interpretations of the HUD Code. The law envisions an update of the HUD Code on a regular basis. Even though HUD is slated to release an update to the HUD Code soon, some of the recommendations considered for this proposed rule were passed by the MHCC over 10 years ago – potentially rendering those items obsolete. Additionally, there is a back log of more than one hundred recommendations submitted to HUD by the MHCC. While an updated and current Code is essential, MHI does not believe this should diminish efforts to ensure the benefits to consumers outweigh the additional costs resulting from new regulations. To maintain housing affordability, it is imperative that HUD conduct adequate cost-benefit analyses of all potential new regulations. As it stands, HUD does not undertake the appropriate cost analysis, testing and research required to update the HUD Code. This results in changes to the Code that drive-up costs without a clear justification that the new regulations will lead to improvements to the Code that are in the best interest of consumers.
Statutory:	Y
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 26 – FR6030-N-01 – 42 U.S.C. 5412 et al	Date: 6/7/2017
Submitter:	Mark Weiss, Manufactured Housing Association for Regulatory Reform
Comment:	Subpart I "Recall" Provisions Subpart I of the HUD Procedural and Enforcement Regulations is the single most significant driver of unnecessary regulatory compliance costs within the federal manufactured housing program. As currently structured, it is a quagmire of redundant and pointless paperwork, needless "investigations" and reports, and multiple layers of document "reviews" by both third-party inspectors and HUD's 40-year, revenue-driven, "make-work" "monitoring" contractor. . . . With no expiration date or statute of limitations and, effectively, no severity threshold (at least for its initial stages), it represents a constant and ongoing regulatory uncertainty that cannot be predicted, accounted for, or budgeted for in any meaningful way, thus aggravating its cost impact on manufacturers and ultimately consumers, who pay more but derive little if anything in the way of benefits. At the same time, Subpart I's ambiguous and often open-ended mandates . . . remain an invitation for abusive and inconsistent enforcement, including increasingly subjective, arbitrary and costly demands imposed on manufacturers by the revenue-driven program "monitoring" contractor in the absence of proper oversight by—and accountability to—HUD. Quantifiable evidence, though, demonstrates that Subpart I has outlived any conceivable usefulness to manufactured homebuyers and should be (1) restructured, to adhere strictly to the express terms of section 615 of the 1974 law; and (2) de-emphasized and de-prioritized as an element of the federal program. . . . HUD's Subpart I regulations . . . require manufactured home producers to investigate and document virtually any piece of "information," regardless of its facial credibility, that could indicate the possible existence of a "defect" or standards non-conformance in an manufactured home. In a small number of cases it requires notice to consumers and, in rare cases, correction of more serious defects, up to and including replacement of the home. This mechanism . . . adds little or nothing to the multiple layers of protection that homeowners already have as a result of: (1) multi-tiered in-plant manufacturer and IPIA home inspections; (2) third-party (DAPIA) design and quality control approvals; (3) state and federal manufactured housing dispute resolution programs; (4) manufacturer home warranties; (5) component supplier warranties; (6) manufacturer and/or retailer consumer satisfaction programs; and/or (7) contract, tort, or statutory consumer protection claims that may be available under state law—and that is without even considering the additional multi-layered protections available to homebuyers under the state and federal installation programs adopted as a consequence of the 2000 reform law.
Statutory:	Y
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 27 – FR6030-N-01 – 24 CFR 203.205	Date: 6/13/2017
Submitter:	Dave Baioni, Rob Shouhayib, John Kapp
Comment:	Subpart I Regulations (42 U.S.C. 5414) - Under the implementation of Subpart I, a one-year warranty for all defects in a manufactured home is required. It would make more sense for the regulations to require an extended warranty for major structural, plumbing, electrical and mechanical systems in the home. It goes beyond the statute to resolve complaints concerning defects and workmanship. It is not practical nor cost effective to divert the attention of the code enforcement system to workmanship issues. These regulations should be modernized to recognize the current state of the manufactured home market and the quality of homes being built today.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 28 – FR6030-N-01 – 24 CFR Part 3282 Subpart M	Date: 6/14/2017
Submitter:	Jennifer Seeger
Comment:	The Department of Housing and Community Development (Department) recommends repeal of 24 CFR Part 3282, Subpart M "OnSite Completion of Construction of Manufactured Homes" in its entirety. Subpart M is unnecessary, creates serious inconsistencies with the U.S.C., imposes costs that exceed benefits, and duplicates state inspections in states that provide installation inspections of new manufactured homes.
Statutory:	Y
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 29 – FR6030-N-01 – 24 CFR Sections 3286.2 and 3286.803	Date: 6/14/2017
Submitter:	Jennifer Seeger
Comment:	The Department recommends modification to 24 CFR sections 3286.2 and 3286.803, to clarify recognition of state installation programs in place prior to the effective date of Part 3286. These Sections are unnecessary and present serious inconsistencies with the U.S.C. Part 3286 became effective June 20, 2008. This is subsequent to the implementation of some state installation programs, including the California installation program. HUD's current enforcement of Part 3286 imposes unnecessary burdens on state programs that have been established far before Part 3286 was effective. As it relates to state installation programs and in order to comply with President Trump's Executive Order 13771, HUD should consider state supremacy as specified within U.S.C., Title 42, Chapter 70, [Public Law 93-383, Title VI, Section 604], Section 5403(d) which specifies that " there is reserved to each State the right to establish standards for the stabilizing and support systems of manufactured homes sited within that State, and for the foundations on which manufactured homes sited within that State are installed, and the right to enforce compliance with such standards, except that such standards shall be consistent with the purposes of this chapter and shall be consistent with the design of the manufacturer." To deviate from the U.S.C. is arbitrary and capricious and creates a serious inconsistency with the implementing regulations.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 30 – FR6030-N-01 – Manufactured housing industry	Date: 6/13/2017
Submitter:	R.E. Crawford, Dick Moore, Inc.
Comment:	The HUD Code manufactured housing industry can meet these present and future needs. An increased emphasis by HUD on the features and benefits of our homes would be a win for this country in a lot of ways, in addition to reducing the housing shortage. Other estimated benefits of a full enforcement of the Act could include up to 1.5 million jobs over the next 5 years and the reduction of or the complete elimination of federal housing subsidies for millions of Americans. Today's manufactured homes are built stronger and safer than ever. The energy efficiency of today's manufactured homes can exceed that of many site-built dwellings. But the buying public still mistakes today's manufactured homes for the "trailers" or "mobile homes" of 40+ years ago. We in the industry know the differences in today's product. Congress realized the importance of manufactured housing 17 years ago, with the passage of the Manufactured Housing Improvement Act of 2000 (the Act). A former HUD manufactured housing program director went on record that our homes are about half the cost, and of comparable quality to moderate site built housing. Even with all those accolades, there needs to be more sharing of those benefits with the American public. It is not uncommon to hear our homes referred to as trailers or mobile homes, which they are NOT. For years, manufactured housing professionals have tried to get HUD to step up to the plate and fully embrace the industry that it is charged with protecting and promoting its growth. The main thing needed for HUD to more fully support the manufactured housing industry is for HUD to robustly implement and enforce all the requirements of the Act. A major part of that implementation concerns the program director, which, by law, should be a non-career appointee. The director currently in place has overseen the implementation of many regulatory burdens and costs in her 3-year tenure, all of which served mainly to increase costs of the manufacturing process while adding little to no real value to the house itself. It is my belief that many federal employees working in the department have honorable intentions, but it appears that some of the program's personnel and direction have consistently worked to promote the status quo (their jobs?), with very little done to properly represent HUD Code homes to the buying public. Sadly, that will never happen as long as the current staffing exists in the program. That would also apply to HUD's General Counsel, should that office not be able to enforce the enhanced preemptions, as Counsel was charged to do under the Act. That is what the president was referring to in the need to 'drain the swamp', in this instance at the HUD Code program administration level. Manufactured housing is the best choice available for affordable housing to today's prospective homebuyer. HUD should be singing the praises of manufactured housing to the country. With the appointment of our new Secretary, (hopefully) the appointment of a new program administrator (to bring the program into compliance with the law), and new administrative personnel in place, American homebuyers would potentially have the means available to them for safe, comfortable, efficient and affordable housing, provided by an industry that has the capacity to meet the demands of the homebuyers of today, tomorrow and the future.
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	

Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 31 – FR6030-N-01 – Interpretive Bulletin	Date: 6/14/2017
Submitter:	John Weldy
Comment:	The Model Manufactured Home Installation Standards sections 3285.312(b)(2)(i) and 3285.312(b)(3)(i) allow professional engineers to design foundations to prevent the effects of frost heave in accordance with acceptable engineering practice. However, HUD's interim guidance memo and draft IB, on this topic eliminated these options by requiring systems to be designed exclusively to standard ASCE 32-1. Effectively, HUD's guidance eliminated the option provided under 3285.312(b)(2)(i) and 3285.312(b)(3)(i) which allowed professional engineers to design cost effective foundation systems which have been successfully used throughout the country effectively for decades. The department has provided no evidence that their guidance, rule, or regulation will solve any real problem or add any value to the consumer
Statutory:	N
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 32 – FR6030-N-01 – Regulatory		Date: 6/14/2017
Submitter:	Lesli Gooch	
Comment:	While an updated and current Code is essential, MHI does not believe this should diminish efforts to ensure the benefits to consumers outweigh the additional costs resulting from new regulations. To maintain housing affordability, it is imperative that HUD conduct adequate cost-benefit analyses of all potential new regulations. As it stands, HUD does not undertake the appropriate cost analysis, testing, and research required to update the HUD Code. This results in changes to the Code that drive-up costs without a clear justification that the new regulations will lead to improvements to the Code that are in the best interest of consumers.	
Statutory:	N	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Reason:		
Cost Impact Explanation:		
Current Status:	Received by Secretariat.	
DRC History:		

Deregulation Comments from FR 6075-N-01

Note: The names of the submitter can be found in **Appendix A - Submitter Cross Reference for FR 6075 Comments**.

DRC # 33 – FR6075-N-01 – HUD Code	
Submitter:	009, 093, 094, 096, 097, 107, 109, 116, 119, 120, 131, 133, 136, 137, 144, 145, 146, 147, 148, 149, 154, 155, 156
Comment:	Manufactured homes are an important source of affordable housing across the U.S. The federal preemptive building code that HUD administers is important because it permits manufacturers to ship across state lines and achieve economies of scale, increasing access. Factory-built housing is efficient and green.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 34 – FR6075-N-01 – HUD Code Updates MHCC	
Submitter:	057,074, 075, 089, 093, 094, 107, 108, 109, 111, 118, 119, 120, 127, 129, 131, 133, 144, 145, 146, 148, 149, 152, 153, 156
Comment:	HUD has not adopted or finalized dozens of MHCC recommendations. HUD should keep the building code current and prioritize adoption of (current and past) MHCC recommendations, instead of its current approach of demanding increased inspections and recertifications of factories, which are not supported by data or evidence of quality issues. HUD's current approach of time-consuming inspections without cause yields increased costs, slows the production line, and limits innovation. The 2000 Improvement Act provides a process for establishing, revising, enforcing, and updating the HUD Code.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 35 – FR6075-N-01 – HUD Code Updates MHCC	
Submitter:	111
Comment:	HUD should update standards as advised by the Manufactured Housing Consensus Committee (MHCC) in order to promote improved consumer safety, use of latest technologies and materials and to be more consistent with State-adopted residential

	building codes for site-built housing. The MHCC type of negotiated rulemaking process provides a productive and effective means to ensure HUD's construction standards and regulations keep pace with current building practices. It enables airing diverse viewpoints and opinions, and is more likely to result in a balanced and informed approach to developing proposed standards.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 36 – FR6075-N-01 – HUD Code Updates	
Submitter:	108, 116, 126, 131, 155, 156
Comment:	HUD should review and provide timely building code updates, e.g., at parts 3280, 3283, 3285. Current rules are out of date. (Unlike International Residential Code (IRC) rules, which have been updated regularly every 3 years since 2000).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 37 – FR6075-N-01 – HUD Code	
Submitter:	027
Comment:	HUD's regulation is burdensome. For example, the requirement for the cement or wood backing to go behind the skirting is imposing additional cost on home buyers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 38 – FR6075-N-01 – HUD Code	
Submitter:	014

Comment:	HUD should address the tie-down retrofit requirement (e.g. homes were tied down and secured to the codes at the time of their placement and were inspected by county building inspectors to be acceptable). When a purchase contract is written, lenders using government backed loan products require an engineering certification on the tie-downs. The engineering inspection is up to $1,000 which the buyer doesn't have. Then there is a cost to retrofit these tie-downs. This is a cost ranging from $3-5,000 which many sellers do not have. The companies that perform the work will not wait until closing to get paid. This has forced the sellers to choose buyers that are cash or convention loans only.)
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 39 – FR6075-N-01 – HUD Code	
Submitter:	116
Comment:	The only section of the IRC which has not received attention and is greatly out of date is Appendix E which deals with Manufactured Home Installation. This has not been updated since the 1980 and does not require inspection of Manufactured homes on land that is not owned. This means that Local Jurisdiction that have building code of other types of house do little to nothing for Manufactured home residents unless they have taken it upon themselves to do so. They do not inspection the installation of homes in any land lease communities. (Mobile home Land/Land Lease communities) in many cases due to the old rules in the IRC Appendix E and the misunderstanding of house the codes in part 3280, 3282, and 3285 work new manufactured homes are mis-installed. Leading to a failure to meet the HUD mandate.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 40 – FR6075-N-01 – HUD Code Updates MHCC	
Submitter:	126
Comment:	Updates to the HUD Code should incorporate energy-efficiency standards in compliance with the 2007 Energy Independence and Security Act, update underlying reference standards, and incorporate common amenities currently requiring alternative construction letters—such as garages, carports, and two-story homes.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 41 – FR6075-N-01 – HUD Code	
Submitter:	014
Comment:	Construction standards should remain high and comparable to a stick built home so that these homes can appreciate rather than depreciate.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 42 – FR6075-N-01 – HUD Code Updates	
Submitter:	140
Comment:	Despite the intentions of the Manufactured Housing Improvement Act of 2000 to accelerate the process by which HUD updates the Manufactured Housing Construction Safety Standards (MHCSS), most notably by the appointment of the MHCC, HUD's efforts have continued to lag far behind the pace of manufactured housing innovation reflected within the NFPA documents, as well as relevant design documents from other standards developers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 43 – FR6075-N-01 – HUD Code	
Submitter:	082
Comment:	HUD should revise 24 CFR 3280.105. The length of the fixed wall needs to be specified to avoid confusion with walls for alcoves. (Commenter provides proposed reg language).
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 44 – FR6075-N-01 – HUD Code	
Submitter:	081
Comment:	HUD should revise 24 CFR 3280.105. This section does not specify window glazing over a tub, hot tubs, whirlpools and saunas. This could result in a person slipping in a tub and falling through a window and getting hurt by sharp broken glass.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 45 – FR6075-N-01 – HUD Code	
Submitter:	083, 084
Comment:	HUD should revise 24 CFR 3280.106 to incorporate minimum height and width (opening) for an egress window. In the latest published edition of the Standards a minimum clearance requirement was removed. (Commenter provides proposed reg language). HUD should incorporate common enforcement industry language into 24 CFR 3280.404. (Commenter provides proposed language to clarify and standardize egress window requirements. The proposed dimensions are also similar to those required for site-built residential occupancies.)
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 46 – FR6075-N-01 – HUD Code Updates MHCC	
Submitter:	140
Comment:	HUD should not allow the MHCSS to stagnate further. HUD's inactivity has left the MHCSS outdated, e.g., a key provision for structural design of MHs references the 1988

	edition of the structural design standard (ASCE-7) from the American Society of Civil Engineers (ASCE has issued new editions in 2002, 2005, 2010, and 2016, each with updates in technical knowledge gained from research and building performance for a range of environmental design loads, including wind, seismic, rain, and snow loads. Title 24, parts 3280 and 3285, contain many such outdated references to standards organizations. (Commenter included a list of out-of-date NFPA references).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 47 – FR6075-N-01 – HUD Code	
Submitter:	140
Comment:	It is unacceptable that MH residents do not have safety parity with site-built home residents, whose homes are regulated by more modern building codes at the state and local level. HUD should leverage NFPA standards to ensure MH housing stock is safeguarded by information and knowledge as current as that applied to site-built homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 48 – FR6075-N-01 – HUD Code Updates	
Submitter:	055, 112, 138
Comment:	The current HUD Code is outmoded, burdening owners of the homes as well as states, the federal government, and the electric grid. HUD should prioritize updating the HUD Code (Manufactured Home Construction and Safety Standards FR-5739) as noted in HUD's Fall 2017 regulatory outlook. This revision must improve energy efficiency and encourage innovation: ○ Improve energy-efficiency: the energy standards of the HUD Code are woefully out of date, having last been revised in 1994. Since then the International Residential Code and the International Energy Conservation Code (IECC) for other homes have been created and then updated at least six times. This is unacceptable. More than 40 states adhere to or surpass the 2006 International Energy Conservation Code. With the median income of manufactured homeowners at $30,000, monthly utility bills often exceed $240 per month, straining the affordability of homeownership. ○ Encourage innovation: as the manufactured housing industry strives to offer improved aesthetics and amenities commonly found in site-built homes, the

	HUD code needs to support innovation, such as incorporating garages, carports, and two-story dwellings, so that cumbersome alternative construction letters are no longer necessary. The underlying reference standards need to be revised as well so that innovations such as tankless water heaters can be utilized.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 49 – FR6075-N-01 – HUD Code Updates	
Submitter:	116
Comment:	The HUD code should be put on a 3-year cycle to update every three years so that new products can come into the industry faster with lower costs and construction stays up to date. For example, any window that meets the needs are the IRC code should also be allowed in a HUD code home.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 50 – FR6075-N-01 – HUD Code	
Submitter:	116
Comment:	There no difference in the use or the needs for a Hot water heater in a Manufactured home vs. a IRC home why then should a HUD code require a special hot water heater or need a special A/C letter and a label to be used in the home. This is an unneeded cost to the consumer in the end.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 51 – FR6075-N-01 – HUD Code	
Submitter:	112
Comment:	HUD should incorporate better consumer information in the HUD Code.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 52 – FR6075-N-01 – HUD Code	
Submitter:	088, 090
Comment:	HUD should clarify the existing standard for serial numbers at 3280.6. Each part of a multi-section manufactured home should have individual identification to track construction history. (Commenter provided proposed regulatory language.)
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 53 – FR6075-N-01 – HUD Code	
Submitter:	130
Comment:	The definition of a manufactured house includes the requirement that a permanent chassis be attached to the house. The permanent chassis serves no purpose. The requirement of a permanent chassis should be removed.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 54 – FR6075-N-01 – HUD Code	
Submitter:	024

Comment:	Double-wide homes should be allowed to have roof trusses instead of 2x2 supports especially in areas where it snows. The siding should be made much sturdier quality than with compressed paper fiber.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 55 – FR6075-N-01 – HUD Code	
Submitter:	083, 084
Comment:	HUD should revise 24 CFR 3280.106 to incorporate minimum height and width (opening) for an egress window. In the latest published edition of the Standards a minimum clearance requirement was removed. (Commenter provides proposed reg language). HUD should incorporate common enforcement industry language into 24 CFR 3280.404. (Commenter provides proposed language to clarify and standardize egress window requirements. The proposed dimensions are also similar to those required for site-built residential occupancies.)
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 56 – FR6075-N-01 – HUD Code	
Submitter:	012
Comment:	The trusses that support the roofing system need to be made with 2x4s at a minimum instead of 2x2s in areas, where there is heavy snowfall.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 57 – FR6075-N-01 – HUD Code	
Submitter:	067
Comment:	HUD should expressly reject any fire sprinkler standard.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 58 – FR6075-N-01 – HUD Code	
Submitter:	067
Comment:	HUD should adopt standards for multi-family manufactured homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 59 – FR6075-N-01 – HUD Code	
Submitter:	117
Comment:	HUD should focus on: (1) creating outcome and performance based standards to replace overly prescriptive design standards; and (2) code development cost of ownership not cost of construction (vertically integrated business infrastructure). HUD should implement productivity-improving technologies and provide funding and a mechanism to accelerate innovation. Currently, there is a fragmented situation where manufacturers are without products, and architects and product designers are without means of manufacturing. As the HUD code for manufactured homes were initially developed for mostly one-story single-family detached homes, homes built under this code today still suffer from limited flexibility for design and customization. As a result, more robust prefabricated technologies and high-quality designs can only be implemented as traditional on-site built homes regulated at the state and local levels, thus cannot benefit from a universally binding, nationally preemptive standard that can much more effectively foster the economies of scale and conduct performance comparison for manufactured designs, products and systems at the national level. Even though the HUD code is intended to provide, to the extent possible, performance-based standards, it is still highly prescriptive about the requirement of designs, choice of materials and technologies. To adopt innovations that can greatly improve productivity and quality, it may require a burdensome, time-consuming and costly Alternative Construction approval from HUD. Consequently, the developers, architects, manufacturers and other

	industry players most likely will choose less desirable pre-approved designs to save time and cost. This issue has also contributed to a negative quality perception and stigmatization about manufactured homes by the general public, customers and developers, and thus caused significant depreciation in value of manufactured homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 60 – FR6075-N-01 – HUD Code	
Submitter:	030
Comment:	HUD should maintain same structural, safety or building standards for manufactured homes as required for site built homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 61 – FR6075-N-01 – HUD Code	
Submitter:	021
Comment:	HUD's regulation for manufactured housing should maintain minimum standards for fire, life safety, indoor air quality, structural strength, and sustainability as is required for standard site-built homes in accordance with commonly accepted codes such as the IRC or CABO.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 62 – FR6075-N-01 – HUD Code	
Submitter:	065, 138

Comment:	The first purpose of the National Manufactured Housing Construction and Safety Standards Act of 1974 is to "….protect the quality, durability, safety, and affordability of manufactured homes." This should be the guide post by which regulations are reviewed. To successfully preempt manufactured housing from state and local building codes, the Manufactured Housing Constructions and Safety Standards must be kept current
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 63 – FR6075-N-01 – HUD Code	
Submitter:	055, 138
Comment:	The HUD code is long overdue for an update. Energy-efficiency standards have not been updated since 1994, underlying reference standards are out of date, and popular amenities, such as garages, require a cumbersome alternative construction approval process.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 64 – FR6075-N-01 – HUD Code	
Submitter:	027, 044, 048, 121
Comment:	Data plate. HUD should consider improving the data plate requirements for manufactured homes to improve valuation of energy-efficiency features and other customizations. The data plate should also be made more durable, to ensure effective transfer of information to future buyers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 65 – FR6075-N-01 – HUD Code	
Submitter:	121
Comment:	HUD should incorporate many of the amenities that now require Alternative Construction letters into the third revision of the HUD Code. Such features should be subject to the On-Site Completion of Construction rule (24 CFR 3282.601).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 66 – FR6075-N-01 – General	
Submitter:	093, 144, 145, 146, 152, 153, 156
Comment:	HUD should consider the economic impacts of all new requirements and regulations related to the construction of MH.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 67 – FR6075-N-01 – MHCSS	
Submitter:	093
Comment:	MHCSS differs from other recognized residential building codes in being a "performance-based" code, allowing factory-home builders to take advantage of new construction technologies and design innovations in a timely manner to more cost efficiently meet the required outcomes of the code. Unfortunately, recent HUD actions have been without evidence of necessity, with no clear benefit to consumers and with no consideration of cost. Examples include HUD's extensive new on-site construction requirements.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	

Current Status:	Received by Secretariat.
DRC History:	

DRC # 68 – FR6075-N-01 – Standards	
Submitter:	076
Comment:	HUD should update its current reference from 2005 edition of NFPA 70 the National Electrical Code (NEC) to 2014.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 69 – FR6075-N-01 – HUD Code	
Submitter:	140
Comment:	HUD should update and expand its references to National Fire Protection Association (NFPA) codes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 70 – FR6075-N-01 – Standards	
Submitter:	140
Comment:	NFPA national fire data indicate that MHs built to HUD standards (post-1976) have a much lower risk of death if fire occurs compared to pre-standard MHs, but 2007-11 data show fires in MH results in 161 civilian deaths and 490 civilian injuries—meaning more can and should be done.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 71 – FR6075-N-01 – Standards	
Submitter:	140
Comment:	HUD should rely on NFPA and NFPA 225, which are developed through an open, transparent, ANSI-accredited voluntary consensus process involving all interested stakeholders, including manufacturers and regulators. HUD's process is duplicative of the ongoing private-sector process. HUD could instead replace parts 3280 and 3285 with references to NFPA 501 and NFPA 225 and commit to timely review and updating of these references as the documents are revised through the NFPA process. This would assist HUD in meeting its statutory mandate and fulfill the expectations of OMB Circular A-119, which directs agencies to favor voluntary consensus standards in part to decrease the burden of regulatory compliance on regulated parties, promote economic efficiency, and eliminate the cost to the federal government of developing and maintaining standards.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 72 – FR6075-N-01 – Standards	
Submitter:	116
Comment:	HUD should take the initiative to make sure that its code sub code used in the IRC like the NEC, IPC and as reference codes stay up to date in the HUD code. The need for electrical safety for the occupants of the home makes no difference as to how the home was built.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 73 – FR6075-N-01 – Standards	
Submitter:	116
Comment:	The references in ICC codes as well as the NFPA codes should be reviewed to make sure that they are compliant with the HUD code. At the present time most sections relating to manufactured housing all predate the HUD code and often do not meet or exceed the HUD code as required by the federal code.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 74 – FR6075-N-01 – Standards	
Submitter:	085
Comment:	HUD should revise 24 CFR 3280.4(aa)(4), Section 3280.801(a) and (b), and Section 3285.4(h)(2) to incorporate by reference the current version of the National Electrical Code (NFPA 70-2017). The latest published edition is the 2017 National Electrical Code. Additional sections within Section 3280 and 3285 would need updated references from NFPA 70-2005 to NFPA 70-2017. (Commenter provides proposed reg language).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 75 – FR6075-N-01 – DOE Rule	
Submitter:	112
Comment:	HUD should update the HUD Code consistent with the statute and consensus agreement for DOE standards. This will save the federal government hundreds of millions of dollars.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 76 – FR6075-N-01 – DOE Rule	
Submitter:	111,131
Comment:	HUD should exercise exclusive jurisdiction over all manufactured housing construction standards, including standards for energy efficiency, and encourages HUD to ensure that the DOE does not move forward with any rulemakings without adequate consultation and guidance from HUD. Federal law gives jurisdiction over the regulation of all aspects of manufactured housing production to HUD. The proposed DOE standards were not

	feasible for manufactured housing since DOE did not work with HUD on an efficient and practical enforcement strategy. HUD should maintain authority over Energy Efficiency Standards for Manufactured Housing, and consider DOE's Proposed Rule: "Energy Conservation Standards for Manufactured Housing" 81 FR 117 FR# 2015-02842 10CFR Part 460 as unnecessary regulatory burden imposed on Manufactured Housing.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 77 – FR6075-N-01 – Guidance	
Submitter:	067
Comment:	HUD should withdraw all operating procedures memoranda and materials relating to expanding in-plant regulation
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 78 – FR6075-N-01 – Guidance	
Submitter:	135
Comment:	Flood elevation requirements on existing manufactured homes should be harmonized with those of other types of construction. [Commenter details current handbook requirements.]
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 79 – FR6075-N-01 – Guidance	
Submitter:	152
Comment:	HUD Handbook 4000.1 (II.A.1.b.iv.(B)(5)(c)(ii) and II.D.5) is creating concerns in industry with pre-existing homes. It states: "For Existing Construction, if the perimeter enclosure is a non-load-bearing skirting comprised of lightweight material, the entire surface area of the skirting must be permanently attached to backing made of concrete, masonry, treated wood, or a product with similar strength and durability." However, you cannot cover the entire surface area of the skirting with backing of concrete, masonry, treated wood, or a product with similar strength and durability without ventilation being addressed, which it doesn't. HUD should amend the Handbook to require what is required in 24 CFR parts 3285.504 (Skirting) and 3285.505 (Crawlspace ventilation).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 80 – FR6075-N-01 – Add-ons	
Submitter:	033,039, 116
Comment:	The special approved for manufactured home use for all sub components of the house should be reviewed to see if they provide any benefit given the added cost. These homes are no longer easily movable trailers that do not preform like an IRC code home why should they now require special fixtures and appliances. If these manufactured or mobile home approved items do not have any special properties other than the tag the requirement that these special approved products should be eliminated to help with affordability. This will also insure that residents of manufactured homes have the greatest level of choice with the least possible cost.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 81 – FR6075-N-01 – Add-ons	
Submitter:	116
Comment:	Component manufactures should be given a clear and easy path to introduce new products to the industry. If a product is presented with all the engineering documents there should be a process at HUD to distribute that to manufactures or park owners through a clearing house. Again, to increase choice and lower costs for homeowners.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 82 – FR6075-N-01 – Inspections	
Submitter:	018, 045,046
Comment:	Rules regarding inspection should be overhauled. Usually, there is a delay for the inspectors to inspect the homes, not only the installation inspection, but also the A/C or S/C inspection (e.g. if the construction time from the factory is around 5 months, then setting the home usually takes around 3 weeks followed by installation inspection which could be a few weeks depending on how busy the inspector is, and the A/C inspection usually takes longer than that.) The delay caused by fulfilling the inspection requirements is burdensome as it adds a loan extension, more interest, and possibly more fees to the customer. If customers are required to have these additional inspections, the inspections should be done in a timely manner without adding cost to customers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 83 – FR6075-N-01 – Inspections	
Submitter:	110
Comment:	HUD's complete failure to educate local building code officials and to require local jurisdictions to correctly interpret and enforce the HUD Code – the same as those jurisdictions must do for every other building code – adds considerable expense and confusion with installation, on-site completion and alternative construction (aftermarket add-ons).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 84 – FR6075-N-01 – Inspectors	
Submitter:	145
Comment:	In some jurisdictions, building inspectors do not want to be involved with the new HUD regulations, causing delays in getting consumers into their homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 85 – FR6075-N-01 – Installers	
Submitter:	079
Comment:	HUD should review the responsibility of licensed installers (e.g., in completion of electrical systems and testing drain and supply lines) and seek more input from installers and make some common-sense changes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 86 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	003, 136
Comment:	HUD recently implemented a program where many items traditionally viewed as site installation and completion require special on-site inspections. These items have no history of quality or life safety related issues and the administration and paperwork required as part of the inspections is extremely cumbersome and unnecessary.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 87 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	129
Comment:	This rule has increased inspection requirements, delayed home completions, and prompted some manufacturers to stop offering consumer-preferred amenities.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 88 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	057, 089, 093, 107, 109, 111, 118, 119, 120, 127, 131, 133, 136, 137, 144, 145, 146, 148, 149, 152, 153, 156
Comment:	Onsite Completion of Construction Requirements--New requirements for post-delivery features are unrelated to home safety/performance and unnecessarily impact consumer choice (e.g., have led some mfrs to stop offering popular consumer amenities, e.g., solar panels, high-pitched/hinged roofs, French doors and window dormers.) HUD also did not adequately assess the increased regulatory burdens and compliance costs to manufacturers, retailers, and installers when devising the rule.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 89 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	067, 131
Comment:	HUD should repeal the On-Site Completion of Construction Rule (24 CFR Part 3282 Subpart M), which went into effect in the fall of 2016, established extensive new labeling and site inspection reporting requirements for the industry. While described as giving more flexibility in the manufacture of homes, the rule in practice actually creates new layers of approval and inspection processes that are costly and burdensome – and adds costs and delays for consumers. In finalizing the rule, HUD did not assess the costs associated with the expanded design approval and inspection requirements for homes that are substantially complete when they leave the factory. By commenter estimates, the rule impacts as many as ten to fifteen percent of all new homes produced, with a cost in the millions.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 90 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	126
Comment:	HUD should preserve the On-Site Completion of Construction rule. This rule ensures that homes completed after they leave the factory adhere to manufacturer specifications and meet HUD Code requirements. As the industry—with the Enterprises' support—moves toward building homes that more closely mirror the aesthetics and build quality of site-built homes, the assurance that the on-site rule provides to lenders, appraisers, and parties to the real estate transaction will be critical.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 91 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	121
Comment:	Without the On-site rule, it is likely that all amenities would have to be completed at the factory or through the more comprehensive Alternative Construction process. It is unclear how this would advance expediency in the field. It could, however, limit innovation. Contrary to trade organization claims, manufacturers have not ceased to offer these amenities due to rule. For example, once large manufacturer recently reported solar panels remain a readily available amenity in their markets. Manufacturers also promote features such as dormers as an option in their marketing materials.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 92 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	145, 155
Comment:	Because of HUD's regulations, the cost of site work and setup have increased the cost of each home by thousands or tens of thousands of dollars, e.g., because rural purchasers must get "big city" (i.e., HUD qualified) installers and construction contractors, who are often hundreds of miles away, to install their homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 93 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	058, 142, 143, 151
Comment:	The installation standards by themselves can add [$5,000, $4-6,000] to the cost of selling and installing a manufactured home.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 94 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	144
Comment:	HUD should not be regulating installations—instead, it should make factories responsible through their dealers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 95 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	145

Comment:	Increased setup costs often go to consumers who do not have the additional money, making previously affordable housing unaffordable.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 96 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	145, 155
Comment:	The extra burden is disadvantaging rural customers, e.g., a family farmer, who are opted not to provide his son a living space on the farm due to the setup costs, or consumers who were homeless due to fire.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 97 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	142
Comment:	The cost-benefit ratio is “completely out of whack” in these requirements.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 98 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	094
Comment:	New requirements for on-site completion have resulted in unnecessary regulation. No one knows better than local authorities how additions should be added to a factory-built structure.

Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 99 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	155
Comment:	HUD's MH installation regulations are activist and cause more harm than good to consumers, retailers, factories, and MH communities.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 100 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	0018
Comment:	Factory requires A/C or S/C letter for on-site installation of patio. For e.g., this is expensive for a customer who is already paying $1,500 plus for the upgrade to the door, then another $1,500 for an inspection.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 101 – FR6075-N-01 – On-site Rule Benefits	
Submitter:	138
Comment:	The On-Site Completion of Construction rule, effective as of September 2016, is critical to ensuring that homes completed after they leave the factory adhere to DAPIA approved designs and meet HUD code requirements. As the industry, with the Enterprises' support, moves toward building homes that more closely mirror the aesthetics and build quality of site-built homes, the assurance that the on-site rule provides to lenders, appraisers, and parties to the real estate transaction will be critical.

	Indeed, training material prepared for the Appraisal Institute on manufactured housing stresses the importance on ascertaining whether appurtenances adhere to the HUD code.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 102 – FR6075-N-01 – Installation Manual	
Submitter:	137
Comment:	In its July 2017 audit and accompanying letter regarding the South Carolina state manufactured housing program, HUD /SEBA notified the State Administrative Agency (SAA) that the state must modify its requirements for the installation of relocated (used) homes for which there is no manual. The SAA was advised that the state would be subject to a takeover of its manufactured housing program by HUD if it did not comply. The agency and its contractor, SEBA, told the SAA that South Carolina's "used" home regulation (79-42) must incorporate the provisions of 24 CFR Part 3285. In the federal regulation itself, these are clearly identified as installation requirements for new manufactured homes. However, it is not clear where HUD's authority to impose new home standards on the second, third or subsequent installation of the houses comes from. Further, it does not even appear that HUD has regulatory authority over relocated home installation. In HUD's 2008 Final Rule (73, FR. 120, Friday, June 20, 2008) it is clear that these standards only apply to the initial installation of a new home. This appears to be an example of "overreach" by HUD. The agency appears to be bypassing the regulatory process by "regulation through audit." If that is the case, this practice appears to be completely inconsistent with the recent presidential orders regarding federal regulations.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 103 – FR6075-N-01 – Installation Manual	
Submitter:	116
Comment:	HUD should form a task force to work on an update the model installation manual. Most manufactures base their manuals on this and it has some errors and is hard to read for the installers. All manufactures manual that have been reviewed so far for compliance with 3285 have had errors that have been noted and corrected. Installers not understanding what needs to be done causes many of the issues with installation. This

	leads to increased service calls for manufactures and dealers and decreased durability and in some cases safety issues for homeowners.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 104 – FR6075-N-01 – Installation Manual	
Submitter:	116
Comment:	Manufacturers should have to update their installation manuals and foundation plans on this cycle so that installers and inspectors know that they are using correct, compliant, and approved plans.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 105 – FR6075-N-01 – Installation Manual	
Submitter:	116
Comment:	There has been a move to better training for installers and this should be a requirement for state approved programs in 3286. There is now Federal Training programs that can be used by states at no cost to them this will improve home installation and thus safety and durability.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 106 – FR6075-N-01 – Installation Manual	
Submitter:	142, 143, 151
Comment:	A setup manual is included in each home, which specifies setup completion. Existing dealers are competent enough to read and understand how to set up a home.

Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 107 – FR6075-N-01 – Installation Manual	
Submitter:	150
Comment:	HUD should return to sole reliance on MH installer compliance using the manufacturer's installation manual.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 108 – FR6075-N-01 – Affordability	
Submitter:	116, 139
Comment:	If a home is not safe or durable, it's not affordable. While the low upfront costs of MH make it an attractive affordable housing option, "affordable housing" means that housing is affordable to operate and maintain, not just affordable at the time of purchase. in 2015, the median family income for MH owners was approximately $30,000, and their annual utility bills were approximately $1,800—twice the national average.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 109 – FR6075-N-01 – HUD Code	
Submitter:	139
Comment:	Commenter's field staff and weatherization partners routinely encounter deteriorating manufactured homes that have been poorly constructed and inappropriately installed.

	Common defects are windows and doors that do not open and close properly, and inadequate venting under homes (a principal source of mold and other indoor air quality decrements). Other examples of advanced deterioration are so severe that they preclude owners from receiving Weatherization Assistance Program services. Homes that are not energy efficient routinely necessitate high utility bills for power, heating, and cooling.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 110 – FR6075-N-01 – HUD Code	
Submitter:	139
Comment:	Relaxing any feature of the MH Code would increase the total cost of ownership for residents and add an array of negative health outcomes—requiring resources that most owners simply do not have.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 111 – FR6075-N-01 – HUD Code	
Submitter:	139
Comment:	New MHs built to the current MH Code would not meet the energy codes in states that have adopted the International Energy Conversation Code (IECC) 2015.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 112 – FR6075-N-01 – HUD Code	
Submitter:	139
Comment:	Increasing energy efficiency standards for MHs would reduce energy use and greenhouse gas emissions, serving local, state, and federal objectives for cleaner air and resilience during severe weather events.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 113 – FR6075-N-01 – HUD Code	
Submitter:	139
Comment:	Lower annual energy bills for MH owners will reduce dependence on fuel assistance
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 114 – FR6075-N-01 – DOE Rule	
Submitter:	139
Comment:	By end of 2018, HUD must implement the 2016 USDOE ASRAC Energy Conservation Standards Proposed Rulemaking for Manufactured Housing, as negotiated among industry and affordable housing and energy stakeholders. Further delay on this important rulemaking implementation will result in significant burdens for new homebuyers and for taxpayers and utility ratepayers. Each year that HUD waits, tens of thousands of new manufactured homes will be added to the roster for future low-income weatherization candidates—which may or may not qualify for that assistance.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 115 – FR6075-N-01 – Engineering Certification	
Submitter:	073
Comment:	HUD should implement conventional guidelines for when an Engineer's Certification is required. While FHA requires an Engineer's Certification on all manufactured homes, Fannie Mae requires a certification only when there are eligible additions or structural modifications.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 116 – FR6075-N-01 – Standards	
Submitter:	138
Comment:	HUD should increase Focus on Compliance with Installation Standards. According to a recent HUD presentation to State Administrative Agencies and Primary Inspection Agencies, 98% of a sample of homes in a HUD administered state failed installation inspections for a variety of reasons including duct work laying on the ground, unsupported drainage and water pipes, and anchoring issues. OMHP's top priority must be to work with SAAs and PIAs to improve overall compliance. In addition: • Permanent Foundations Guide to OMHP: in order to receive conventional or FHA Title II financing, manufactured homes must be affixed to a permanent foundation. The reference standard is often the Permanent Foundation Guide for Manufactured Housing (PFGMH) that is maintained by Policy Research and Development. Revisions to the PFGMH should be carried out by OMHP, and it should be incorporated into HUD's installation standards (24 CFR 3285 and 86).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 117 – FR6075-N-01 – States	
Submitter:	127
Comment:	In MS, the SAA requires an inspection on all installations of new or pre-owned MHs, used for SF dwelling. This state regulation has reduced the number of consumer complaints concerning MH.

Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 118 – FR6075-N-01 – On-site Rule Burdens	
Submitter:	115
Comment:	HUD should repeal 24 CFR Part 3282, Subpart M "On-Site Completion of Construction of Manufactured Homes" in its entirety. Subpart M is unnecessary, creates serious inconsistencies with the U.S.C., imposes costs that exceed benefits, and duplicates state inspections in states that provide installation inspections of new manufactured homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 119 – FR6075-N-01 – Carport/Add-on Guidance	
Submitter:	055, 057, 074, 075, 089, 093, 094, 107, 109, 110, 118, 119, 120, 121, 127, 129, 131, 133, 111, 144, 145, 146, 148, 149, 152, 153, 156
Comment:	HUD's on-site completion policy allows manufacturers to offer numerous options which are not transportable attached to the home as it leaves the factory. They must be field applied due to weight, heights or the fragile nature of the material. HUD's regulation of on-site installation of add-ons that comply with HUD standards when they leave factory directly conflicts with statute. 2017 expansion of regulation to production of carport-ready homes without going through a proper rulemaking process was arbitrary--such production has been part of MH for decades. Result has been increase in home prices for carport-ready homes and curtailment of popular consumer feature. The latest HUD letter on carport-ready homes is, in MHI's opinion, a misinterpretation of current regulations and directly contradicts current regulations. Further, because of the lack of any advance notification, grace period, or public comment period, this action resulted in manufactured housing plants with tens of millions of dollars of backlogged orders because of the unexpected new requirement by HUD. This is a significant, and abrupt, change with an extremely negative impact on manufacturers, dealers, and most importantly low- and moderate-income homeowners. Moreover, HUD's action to require carport-ready homes to receive AC letters was not presented to the MHCC prior to its implementation. As such, there was no discussion

	about the pros and cons of this requirement for consumer safety and no cost benefit analysis was conducted. That HUD would arbitrarily and without discussion remove this option for consumers is inexplicable. Some manufacturers have stopped offering carport-ready homes as a result of this action by HUD. Others have increased the cost of a carport-ready home to cover the additional red tape that is now required by HUD. As a result of HUD's actions, consumers are at more risk than they were previously because their homes no longer have additional roof reinforcements built-in at the factory. There are real safety hazards to consumers posed by HUD's action. The Department has not conducted a study of their own in the last decade to substantiate this significant policy change. HUD should rescind the June 2014 guidance letter regarding "Add On" structures as inappropriate under the HUD Code and underlying statute. Further, MHI is not aware of a compelling reason to require carport-ready designs to have AC letters. If HUD determines that there should be additional HUD regulation for add-ons or carport-ready home designs, it must first issue an Interpretive Bulletin subject to Manufactured Housing Consensus Committee (MHCC) discussion and input, and solicit public comment before enacting such a change. Alternative Construction (AC) letter requirements for certain items (e.g., roll-in showers, whole-house ventilation for homes over a certain size), due to failure to update the HUD Code, stifles innovation and limits consumer choice. The AC approval process places unnecessary conditions which limit the industry's ability to serve disabled consumers effectively, such as limiting approvals to 25 homes, placing a 2-year expiration of the approval, etc. Instead of updating the code to accommodate persons with disabilities, the current program forces manufactured home builders to continue to request special written permission for AC approval, and subsequent renewal every two years, or when the 25 homes limit is reached. (Commenter 111 provides other examples).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 120 – FR6075-N-01 – Carport/Add-on Guidance	
Submitter:	121
Comment:	Attached carports and garages are add-ons as per 24 CFR 3282.7, and are subject to the regulation's approval process. If HUD chose to suspend this guidance or modify the regulation in order lessen oversight, it may lead to compromised homes, reduced home values and resales, and possible safety hazards. [Commenter cites outside sources to support argument.] HUD must ensure that engineering, science and evidence drive the approval process for the modification of HUD Code homes.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 121 – FR6075-N-01 – Carport/Add-on Guidance	
Submitter:	107, 116
Comment:	HUD misapplied AC requirements in 2017 by arbitrarily expanding scope of authority to include carport-ready homes. This was despite HUD's own assessment that no post-1994 or post-1999 MH home experienced more than minor damage from Charlie. In Florida, after Irma, most of the damage to post 2005 Manufactured homes (date of change in state requirements) was due to flying debris from pre-2005 Florida installation code changes and pre-HUD code homes. Most of the homes that were installed after this date had little to no damage from the hurricane itself other than the occasional tree that fell and damaged the carport itself; and little can be done in the way of installation or construction codes to remedy that. Florida inspection/building permit process already included carport structure and attachment.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 122 – FR6075-N-01 – Carports Garages	
Submitter:	116
Comment:	All manufactured homes should be denoted as either being designed to accept or an attached garage/carport or not. Homes that are not designed for the attachment should have this noted on their required data plate boldly. Manufacturers that designate their homes to have an attached garage or carport should provide a design plan for the attachment in all their manuals and also an electronic PDF to HUD. The design should state what wind zone and snow load zone they are design for since what is needed for snow load is not the same as what is needed for wind up lift. The cost of the standard design for an attached garage/carport would only needed to be born once and could be used by all of the homes for the manufacture or the industry as a whole if it could agree. In fact, the industry itself could come together and have a design for attached carports and garages added to the HUD code itself. Even if this design would cost $20,000 for the industry to come up with the design that cost spread over just one year's production is only $ .25 per home the first year given production levels and then free afterwards. The actual cost would be closer to $5,000 so that would only cost about $ .06 per home the first year. For manufacturers that chose not to provide this it would cost nothing to just update to the label printing. That any attachment needs to be free standing. This would

	also not hold back a person from adding a carport or garage to a non-ready home in the future it would only require then to make the structure free standing, or to use the rules in 3285.2 to have it designed by a PE or RA and approved by the manufacture and its DAPIA.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 123 – FR6075-N-01 – Standards	
Submitter:	116
Comment:	All of the passed approved MHCC approved code changes should be put into an updated 3285 standards and these standards should have a stated update cycle every 3 years as does the ICC codes to keep them current.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 124 – FR6075-N-01 – Standards	
Submitter:	116
Comment:	More cross involvement from HUD with the ICC and NFPA to make sure that all new homes are installed with standards equal to part 3285 as required by the CFR. One unified code is the best way to decrease costs and insure the co-mandates of safety and durability are meet for the homeowners.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 125 – FR6075-N-01 – Carport/Add-on Guidance	
Submitter:	131
Comment:	In a June 2014 guidance letter, HUD cited 24 CFR 3282.7 in defining an "Add On" as "any structure (except a structure designed or produced as an integral part of a manufactured home) which when attached to the basic manufactured home unit, increases the area, either living or storage, of the manufactured home." HUD's examples of such structures include: "garages, family rooms, sun rooms, enclosed decks, etc." and would require Alternative Construction approval. MHI continues in its belief that requiring Alternative Construction approval for homes that are in compliance with the standards when they leave a manufacturer's production facility is inconsistent with the letter, intent and purpose of 24 CFR 3282.14. The regulations simply do not require manufacturers to seek prior approval for certain attached garage designs. This position was unanimously supported by the Manufactured Housing Consensus Committee (MHCC) at its December 2014 meeting. Despite the MHCC vote, HUD proceeded to require prior approval of homes designed for garages without providing sufficient rationale for this action and without going through a formal rulemaking process to solicit public input prior to implementing this change. To make matters worse, in 2017 HUD arbitrarily expanded the interpretation of the 2014 guidance letter to include designs of carport-ready homes. MHI does not agree with HUD's findings and does not believe the regulation of carports by HUD is warranted or appropriate under statute and current regulations. A carport does not meet any of the above-mentioned criteria or descriptions of an "Add On" as contained within the June 2014 guidance letter. Carports are not used for storage; they are free standing and attached to the roof by a support beam calibrated to withstand the extra weight. Carports also do not provide additional living space. Since carports are free standing structures, attached only at the roof, any issues regarding ventilation, egress, etc., simply do not apply. Furthermore, carport-ready homes have been a staple of the industry for decades.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 126 – FR6075-N-01 – Carport/Add-on Guidance	
Submitter:	131
Comment:	HUD should reassess its utilization of AC letters to ensure they only address items that are non-conforming with the HUD Code. With respect to carports and garages, these items are already addressed by the Code, so the AC requirement is duplicative and unnecessary. Finally, when AC letters are genuinely required, the approval should not expire as the reapplication process is timely and unnecessary.
Statutory:	No
Subcommittee Recommendation:	

MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 127 – FR6075-N-01 – AC Letters	
Submitter:	116
Comment:	A program where new product can be used with an alternative construction letter is good to test their use, but when that letter is requested more than 3 times that component should be review to see if a general rule can be approved for all manufactures for all HUD code homes and this be brought into the code to help reduce cost of evaluation each time it is requested.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 128 – FR6075-N-01 – AC Letters	
Submitter:	022
Comment:	HUD should review the requirements of Alternate Construction and Site Construction. These requirements are duplicative and cumbersome and results in costly burden for the consumers. For e.g., the inspection of site-built garage is burdensome for manufacturers as it requires additional time and paperwork, and results in an increasing cost for consumers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 129 – FR6075-N-01 – AC Letters	
Submitter:	063
Comment:	Section 3280.709(h) requires a water heater drip collection and drain pan, this requirement is not compatible with modern tank-less hot water on demand water heaters. Consumers choice of upgrading to the Installation of a tank-less on demand water heater is forcing manufacturers to resort to the AC (Alternate Construction)

	reporting for this common customer energy saving feature. This is one of many examples of outdated regulations that add cost and burden to consumers who choose smart and energy efficient manufactured homes. Simply amending this requirement to state 'water storage tanks used for heating water' or otherwise exempting on-demand water heaters would eliminate the AC letter requirement.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 130 – FR6075-N-01 – Pro-preemption	
Submitter:	057,059, 060,074, 075, 089, 093, 094, 108, 109, 118, 119, 120, 131, 144, 145, 146, 148, 149, 152, 153, 156
Comment:	Despite having legal authority, HUD has been lax in intervening when local jurisdictions have sought to impose different/conflicting standards or exclude HUD-compliant homes. Because local regulations, e.g., zoning ordinances, that exclude MH often have a disparate impact on protected classes, enforcing preemption would further HUD's mandate under the Fair Housing Act.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 131 – FR6075-N-01 – Pro-preemption	
Submitter:	060,064, 103, 150
Comment:	HUD should step forward in opposition to local regulatory schemes [that are] at odds with the federal building code and enforce preemption.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 132 – FR6075-N-01 – Preemption Guidance	
Submitter:	134
Comment:	HUD's guidance and policy on federal preemption, namely its "Notice of Internal Guidance" and "Statement of Policy 1997-1," should be updated to reflect changes to the 1974 Act in the MHIA of 2000 [commenter describes each document in detail]. The preemptive nature of the standards should extend to installation instructions adopted and enforced through conforming state plans. The Federal superintendence of the MH program should not be limited to construction of the home—but should encompass other actions that impact the functionality, safety, and cost-effectiveness of the home. HUD should extend the enhanced preemptive protections in the MHIA of 2000 to include the installation of new homes under conforming state plans in states that meet or exceed the provisions of part 3286. As a result, HUD would prohibit cities or other local jurisdictions from imposing disparate installation standards, regulations, or instructions, which are often used as barriers to the siting of MH as affordable housing stock. Local governments should be prohibited from adopting or continuing to enforce disparate installation regulations which are not identical to the federal standards or are inconsistent with the state standards for installation and the design of the manufacturer. While the Statement of Policy clearly addresses the lack of State and local authority to establish MH standards that are different from Federal standards, it fails miserably by appearing to grant localities a de-facto right to discriminate, provided that all forms of factory-built housing are equally excluded or restricted. MHIA of 2000 added important language to 42 USC 5403(d), namely a new term in the reference to "State or local *requirements* or standards" (emphasis added). The addition of "requirements" has been overlooked or ignored by HUD in its post-2000 interpretations of the scope of preemption. Term indicates that Congress intended that preemption power would apply to local conditions or restrictions, other than construction "standards." To the contrary, HUD's interpretation of this amendment language has been limited to "disparate state or local requirements or standards" which the Department has narrowly interpreted to be construction and safety standards *only*.—largely ignoring Congress's intent that preemption under the amended Act be "broadly and liberally construed" to apply to "state or local requirements" that affect the "Federal superintendence of the manufactured housing industry." In rejecting a proposed regulation concerning land use regulation from MHCC in 2003, HUD narrowed its interpretation of the language from the 2000 even further—to apply only to construction and safety standards referenced in 24 CFR 3280—stating: "The amendment did not modify the basic substance of the statutory preemption provision. By its specific terms, the provision apply (sic) to construction and safety standards, generally codified in 24 CFR part 3280. It does not apply to other regulations, including the Manufactured Home Procedural and Enforcement Regulations in 24 CFR part 3282." Since that time, HUD has consistently taken the narrowest approach to applying the term "broadly and liberally construed" maintaining that other parts of the MH program

	(incl. installation standards and dispute resolution) somehow do not fall under the "preemptive powers" of the Department's Federal superintendence of the industry. HUD has also appeared to sidestep the Congressional directive in the 2000 Act's "Findings and Purpose" section by re-stating its narrow interpretation. The state and local activity that HUD clearly believed it had authority to prohibit under the "Federal superintendence" clause in 1997 has been eroded by self-imposed interpretations of the limits of the scope of preemption.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 133 – FR6075-N-01 – Pro-preemption	
Submitter:	134
Comment:	HUD should review its commitment to providing affordable housing opportunities to all Americans—particularly those low-to-moderate income families who choose to pursue the American dream of homeownership by purchasing a MH. Reducing the discriminatory regulations, ordinances, and practices of certain local governments through the broad and liberal application of preemption power by HUD would be a "next step" that is many, many years overdue."
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 134 – FR6075-N-01 – Pro-preemption	
Submitter:	129
Comment:	In the area of the supremacy of federal standards or preemption, local governments have become very cleaver in the way they craft ordinances to skirt a federal preemption. One way local governments have used the federal building code as a barrier to keep families from placing manufactured housing in their jurisdiction is through the use of age limitation for manufactured housing. A local ordinance will state that no manufactured home over ten years old can be placed within their jurisdiction. Looking at HUD's May 5, 1997, Statement of Policy 1997-1, if the element of age were included, you'd have two homes both are ten years old and one is built to the local code and one is built to the federal preemptive building code and only the HUD code home is precluded from entering a jurisdiction. In the commenter's opinion, preemption has been violated. This type of age limitation is being seen across the nation and poses a

	serious threat to the supply of affordable housing. The limitation of age has a two prong, long term, negative impact on manufactured housing: first, the policy erodes consumer confidence in purchasing manufactured housing calling into question the quality and longevity of manufactured housing; and two, it devalues existing manufactured homes already in place in the community that adopts such a policy. HUD should take a closer look at the way local governments find methods, like the age of a manufactured home to keep it from being placed.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 135 – FR6075-N-01 – Anti-preemption	
Submitter:	105, 106
Comment:	HUD should modify part 3286 to clarify recognition of state installation programs in place prior to effective date of part 3286 in June 2008—they are unnecessary, impose burdens on state programs, and present serious inconsistencies with USC. [commenter provides proposed reg language]
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 136 – FR6075-N-01 – Pro-preemption	
Submitter:	079
Comment:	HUD inspection should preempt the local inspection. MH customers, communities, and installers must navigate a web of differing local jurisdictions' requirements. Loopholes in HUD code can allow local jurisdictions to discriminate against HUD MH development by adding unnecessary costs and making MH economically unviable. Perhaps the conflict [dispute] resolution program could be better utilized to quickly address issues between installers and building officials.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	

Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 137 – FR6075-N-01 – Preemption Guidance	
Submitter:	131
Comment:	HUD should update its existing directive on zoning—authority to do so rests in the fact it was issued in 1997 – after the Original Act, but prior to the Amended Act. The passage of the Amended Act expanded HUD's authority. It did not restrict it. Revision of the directive thereby is appropriate. A comparison of the two pieces of legislation places HUD on solid ground to do so.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 138 – FR6075-N-01 – Preemption Guidance	
Submitter:	067
Comment:	HUD should withdraw all pre-2000 "guidance" regarding the scope of federal preemption
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 139 – FR6075-N-01 – Subpart I Burdens	
Submitter:	067
Comment:	HUD should amend Subpart I to conform with applicable law.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	

Current Status:	Received by Secretariat.
DRC History:	

DRC # 140 – FR6075-N-01 – Subpart I Burdens	
Submitter:	121
Comment:	Trade associations have expressed concerns that this rule is burdensome, especially if there are indications that a class of homes may have a covered defect. It seems reasonable, however, that a manufacturer bears the burden to determine and correct a systemic problem with a class of home. Such practices are common in other mass-produced products and help assure the purchasing public of product integrity.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 141 – FR6075-N-01 – Subpart I Burdens	
Submitter:	111, 120, 131
Comment:	Subpart I should be reviewed for revision or potentially repealed, as it places an excessive burden on the MH building industry without comparative benefit. Today's MH does not resemble vehicle-like MHs of the past, making subpart I less appropriate. However, HUD should regulate MHs, to the extent necessary, to ensure MHs are safe for consumers. After years of regulatory expansion, Subpart I operates more as a burdensome extended home warranty process than a consumer life-safety protection system, as originally intended—having crept into a thousand non-life-safety-related issues. This is due in part to expansion of the MHCSS. [Commenters gives examples of this].
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 142 – FR6075-N-01 – Subpart I Burdens	
Submitter:	052, 053 119, 131
Comment:	HUD should reduce paperwork burdens and defer to state agencies on consumer complaints (commenters give examples of these burdens). HUD should not apply "lemon law" to MH, as subpart I currently does—it does not apply to site-built homes and is more suited to automobiles. Issues can be addressed through home warranties.

	Subpart I is burdensome due to voluminous procedures, checklists, and guidance documents.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 143 – FR6075-N-01 – Enforcement	
Submitter:	023
Comment:	HUD should institute shutdown action against builders who receive more than 6 reasonable complaints from home buyers
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 144 – FR6075-N-01 – Enforcement	
Submitter:	112
Comment:	HUD should ensure effectiveness through improved compliance [commenter gives examples].
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 145 – FR6075-N-01 – Enforcement	
Submitter:	122
Comment:	HUD should ensure: Manufactured Housing Improvement Act of 2000 is fully enforced, • enhanced preemption of HUD Code manufactured homes becomes a rapidly implemented reality, • the right MH program administrator is put in place, Vic DeRose,

	• once revisions noted and linked from above for the FHA Title I and Title II and other related loan programs are made, • and educational efforts
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 146 – FR6075-N-01 – Enforcement States	
Submitter:	138
Comment:	Compliance responsibility cannot be outsourced to state and local officials who are unfamiliar with the HUD Code.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 147 – FR6075-N-01 – Enforcement	
Submitter:	077
Comment:	HUD should protect consumers (especially seniors) from inspectors and installers. HUD is looking into complaints, they are finding a lot of large issues, (complete disregard of the Manufacturers Construction Manual, improper grading of the land, which causes water & mold under the home, foundations installed incorrectly, missing supports and hold downs). The commenter believes that if installers or inspectors are not qualified they shouldn't be allowed to sign off on any of the necessary paperwork and if they are qualified they should be held accountable. HUD oversight should not be cut back in any way, if anything, it should be increased.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 148 – FR6075-N-01 – Enforcement	
Submitter:	099
Comment:	HUD-certified inspections identify problems that others do not (commenter provides examples).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 149 – FR6075-N-01 – Inspections	
Submitter:	116
Comment:	There should also be an effort to educate local inspectors as to the requirements of the HUD code there is a receptiveness of this on the part of the ICC. If the industry supported inspections all finished homes the cost per inspection would decrease and the quality and durability of the home will increase.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 150 – FR6075-N-01 – Frost-free	
Submitter:	067
Comment:	HUD should withdraw or amend its pending frost-free “Interpretive Bulletin.”
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 151 – FR6075-N-01 – Frost-free	
Submitter:	126
Comment:	HUD should focus on strengthening its installation program by ensuring that frost free foundation systems meet HUD code criteria in terms of soil testing, water drainage, etc., and that inspectors are trained to properly evaluate and inspect these systems.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 152 – FR6075-N-01 – Frost-free	
Submitter:	056
Comment:	It is burdensome to satisfy the requirements of frost free foundation. There should be some regulation of foundation and foundation should take surface preparation into account (grading, drainage).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 153 – FR6075-N-01 – Frost-free	
Submitter:	060
Comment:	Frost-Free Foundation slab engineering is costly. For example, a working design took over 2 years for re-approval for a multi-section home.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 154 – FR6075-N-01 – Frost-free	
Submitter:	061
Comment:	HUD is now requiring expensive frost free concrete slabs which can cost up to $12,000 to install for a typical single wide manufactured home. For example, there has been no evidence that states such as Wisconsin and Illinois installation requirements, which were in accordance with the manufacturers set-up instructions, were causing homes to be improperly set up.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 155 – FR6075-N-01 – Soil	
Submitter:	061
Comment:	Local building inspectors should be given leeway and deference when inspecting the set-up of a new manufactured home because they are familiar with local soil and drainage conditions.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 156 – FR6075-N-01 – Frost-free	
Submitter:	110
Comment:	HUD should proceed with its interpretive bulletin that provides guidance for designing and installing manufactured home foundations in areas subject to freezing temperatures and seasonal ground freezing by allowing state licensed professional engineers and architects with local experience to design suitable foundations without the duplicity of review and approval by the manufacturer and its DAPIA.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	

Current Status:	Received by Secretariat.
DRC History:	

DRC # 157 – FR6075-N-01 – Frost-free	
Submitter:	041, 110
Comment:	HUD should not prescribe any one specific foundation system, and a significant review of successful frost-free designs already employed in colder climates would benefit both the industry and consumers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 158 – FR6075-N-01 – Frost-free	
Submitter:	051, 059 110
Comment:	HUD might also consider an option for not requiring a frost protected/proof foundation given the consumer's informed consent and compliance with a HUD approved above frost line stabilization and support system. Consumers should, when provided with all the facts, be allowed to utilize the most prudent foundation system they can afford. There is no one-size-fits-all solution.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 159 – FR6075-N-01 – Foundation Burdens	
Submitter:	045, 046, 110
Comment:	HUD should remove the requirement for additional review of a state licensed architect or engineer's alternative foundation design by the manufacture and its DAPIA. See §3285.2 (c)(ii).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	

Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 160 – FR6075-N-01 – Soil	
Submitter:	041,110
Comment:	Ground Moisture Control §3285.204 - Seems redundant due to high quality vapor barrier applied to the home's underbelly. Adds $225 - $350 per home. It gets torn up if laid down before the home is moved on, home owners and subcontractors tend to move it around while installing cable TV, telephone etc. Often an additional trip is required to spread it back out to the edges to pass the required Form 309 inspection. If block or brick perimeter foundation walls are utilized, the ground plastic will not extend beyond the foundation. Exposed ground plastic will not remain in place long-term.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 161 – FR6075-N-01 – Installation systems	
Submitter:	041, 057, 059, 064, 089, 057, 093, 094, 097, 109, 114, 119, 120, 131, 133, 144, 145, 148, 149, 150, 152, 153, 155, 156
Comment:	HUD lacks clear evidence that installation systems are failing. HUD is limiting states' ability to administer their own installation programs. States should be permitted to establish and enforce their own installation programs (including regulations and acceptable alternative designs), based on acceptable engineering practices. HUD's one-size-fits-all approach is inappropriate (e.g., unnecessary, burdensome, beyond HUD's authority under HUD Code, or have nothing to do with structure of home) and should be stopped.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 162 – FR6075-N-01 – Foundation Burdens	
Submitter:	031
Comment:	The requirement to have poured footers up to 42 inches make it more expensive.

Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 163 – FR6075-N-01 – Foundation Burdens	
Submitter:	155
Comment:	HUD should reverse its MH foundation regulations, because consumers take on extra debt to pay for foundation requirements arbitrarily mandated by HUD.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 164 – FR6075-N-01 – Foundation Burdens	
Submitter:	155
Comment:	HUD should reverse its MH foundation regulations because they force mobile home park and land owners to install unnecessary and useless permanent foundations on rented land for temporary structures. These foundations delay installation for the consumer and become useless to any new, incoming MHs.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 165 – FR6075-N-01 – Foundation Burdens	
Submitter:	051, 155
Comment:	HUD's mandate that new MHs have 20-40 24-in concrete piers per home costs purchasers $6k-$20k (or 20-30%) more than the cost of the home.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 166 – FR6075-N-01 – Foundation Burdens	
Submitter:	155
Comment:	MHs are temporary and have been without piers for decades until HUD decided to increase its regulatory footprint.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 167 – FR6075-N-01 – Foundation Burdens	
Submitter:	155
Comment:	Customers, retailers, landowners, and manufacturers agree that there's no proof piers offer better support than industry-mandated guidelines from previous decades.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 168 – FR6075-N-01 – Foundation Burdens	
Submitter:	155
Comment:	Foundation requirements incentivize customers to keep old homes instead of getting new ones, because installation of new ones is too expensive.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	

MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 169 – FR6075-N-01 – Frost-free	
Submitter:	018, 079, 151
Comment:	Satisfying the requirements of "frost free" manufactured homes is costly for customers without sufficient evidence of benefit.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 170 – FR6075-N-01 – Frost-free	
Submitter:	045,046, 062 142, 143, 151
Comment:	The frost-free (or frost-proof) footing requirements are ridiculous/onerous if placing a home in a manufactured housing community. Commenter 062 is State of Vermont Department of Housing and Community Development, and their comment is based on input from manufactured housing retailers and installers in Vermont. They reiterated that the regulation is unnecessary and it imposes costs that exceeds benefits.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 171 – FR6075-N-01 – Frost-free	
Submitter:	064, 150
Comment:	HUD's on again/off again approval of frost-free foundations should cease immediately.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	

Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 172 – FR6075-N-01 – Frost-free	
Submitter:	064, 150
Comment:	HUD should, in the case of frost-free footing, return to the tenets of effective foundation design, a.k.a., "Alternative Shallow Frost Protected Foundation Design for Manufactured Homes," per Paul W. Hayman, MS, PE, of Hayman Engineering, Inc., under guidance of Systems Building Research Alliance (SBRA), as once approved by HUD.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 173 – FR6075-N-01 – Frost-free	
Submitter:	138
Comment:	Frost Free Foundation Systems Compliance with HUD Code: as with the overall installation program, focus should be on compliance with the standards as laid out in 24 CFR 3285 and 86. SAAs and PIAs should be aware of the requirements around, for example, soil testing, and water drainage, as well as the foundation systems that meet the HUD standards.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 174 – FR6075-N-01 – Frost-free	
Submitter:	129
Comment:	This proposed rulemaking treads on the regulatory activities and authority given to state installation programs in 3285.301 (d) Alternative foundations systems or designs are permitted. Even more concerning, there was no clear evidence that the current foundations in freezing temperatures being utilized were failing. In HUD's own words the notice states that, "Frost-protected shallow foundations have been successfully used both domestically and internationally in residential and commercial applications for over 50 years as a means to avoid deeper and more costly foundations systems."

	This is truly unnecessary and overreach into HUD approved state installation programs which will end up costing taxpayers and manufactured homebuyers more money than necessary by HUD duplicating what states are already doing. States are capable of evaluating foundations systems based on the criteria provided in the Manufactured Home Installation Program Final Rule.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 175 – FR6075-N-01 – Frost-free	
Submitter:	121
Comment:	HUD and its contractors have reported numerous failures of installed foundations for manufactured homes, justifying a rigorous, though cooperative approach to the issue. HUD should not prescribe a specific foundation system, and reviewing successful frost-free designs in colder climates would benefit the field. HUD should continue its process on the development of the Interpretive Bulletin (IB), but it should proceed cautiously, with safety and soundness of foundations as its primary concerns.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 176 – FR6075-N-01 – Frost-free	
Submitter:	097
Comment:	Re: HUD's enforcement of the foundation requirements in northern climates, HUD's assumptions and the requirements implemented in this area are not supported by scientific data. HUD has refused to consider legitimate scientific studies that conclude that frost-heave IS NOT an issue in some northern climates and continues to mandate extremely costly foundation designs that DO NOTHING except add costs that the consumer is forced to bear.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	

Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 177 – FR6075-N-01 – Frost-free	
Submitter:	095
Comment:	HUD should not remove safety regulations for installation of mobile or manufactured homes whether in an area with ground freezing or not. The current regulations were developed over decades based upon experience. Contractors need to have guidelines. Homeowners need to be able to trust that their home will be a safe place for themselves and their families to live in after installation.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 178 – FR6075-N-01 – Frost-free	
Submitter:	131
Comment:	Commenter strongly objects to the proposed Interpretive Bulletin (IB), which limits much of the discretion afforded to the industry in 24 CFR Part 3285 and prohibits the use of existing engineer-approved, state-approved systems without providing any evidence of performance issues or problems with such time-tested construction practices. In states like Maine, Wisconsin, and New York, approved installation practices have been administered for years at the state level and have no instances of failures. The recent “polar vortex” winters, with no resulting instances of installation failures, demonstrates that this process is working.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 179 – FR6075-N-01 – Frost-free	
Submitter:	131
Comment:	While HUD should ensure that homes in freezing climates are installed safely and securely, the proposed IB is not the appropriate approach to achieving this objective.

	Despite incorporating some of the recommendations by the Manufactured Housing Consensus Committee (MHCC), the IB still creates regulatory conflict and uncertainty, and restricts or limits operations currently provided for in the HUD Code. The IB lacks clarity and creates conflict with statute, as evidenced by the title alone, which includes both the words "model" and "requirements." It is not appropriate or in line with statute for HUD to limit acceptable engineering practices or fundamentally alter the discretion provided for in the HUD Code. States with approved programs should be permitted to establish and enforce regulations and determine acceptable alternative designs. HUD should withdraw the proposed IB and focus on highlighting performance-based best practices. The proposed IB unnecessarily places limits on the flexibility of professional engineers and architects that have experience designing systems based on knowledge of local site conditions. For example, there are many methods for assessing soil frost-susceptibility and subsurface drainage conditions. When designing systems, engineers and architects should continue to have the flexibility with their approach to determine soil type and frost heave susceptibility, including the ability to rely not only on soil tests, but soil records, and soil classifications and bearing capacities, as is provided for in 24 CFR 3285.202(b) and 3285.312(b)(1). While the IB includes requests for verifiable strategies that have been effective and successfully used in other states, the final IB must not insist on adherence to the American Society of Civil Engineers' "Design and Construction of Frost Protected Shallow Foundations" (ASCE 32-01), because that would limit other acceptable engineering practices and fundamentally alter the discretion provided for in the HUD Code. States with approved programs should be permitted to establish and enforce regulations and determine acceptable alternative designs, as they do today. To ensure compliance with 24 CFR Part 3285, HUD should focus on encouraging best practices, while allowing for design innovation and the integration of more efficient, modern, and cost-effective building and design technologies.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 180 – FR6075-N-01 – HUD Code	
Submitter:	126
Comment:	HUD should focus on strengthening its installation program by incorporating updates to the Permanent Foundations Guide for Manufactured Housing into the HUD code.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	

MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 181 – FR6075-N-01 – Soil	
Submitter:	155
Comment:	HUD's regulations do not account for soil issues, e.g., local soil conditions. HUD installation requires that installation sites be "built up" by the installer, causing the soil to be soft on top and extreme settling underneath the home. Required installation of a "vapor barrier" of plastic to be put under the home just before the home arrives creates logistical problems and causes water to be trapped under the home, causing problems for the soil.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 182 – FR6075-N-01 – Soil	
Submitter:	116
Comment:	There is an important note that restricts the use of the Hayman design to sites on non-frost-susceptible soil—this is defined and addressed in the IB. [Commenter 116 goes into greater detail re: frost-free soil issues.] Given these facts and that the IB is not a new regulation it should move forward. Clarifying alternative foundations that do meet existing code and those that do not it should be a focus of the industry since it will reduce cost and improve durability and safety. HUD should also continue to encourage the industry to innovate other foundation systems that meet the code at a lower cost.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 183 – FR6075-N-01 – Foundations	
Submitter:	017
Comment:	HUD should repeal the requirement that manufactured home could have never been placed at another location (if a home has a HUD approved foundation and meets the

	other criteria, then there should not be any restriction to move the home to another location).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 184 – FR6075-N-01 – MH Significance	
Submitter:	025
Comment:	More affordable manufactured housing is needed in Lehigh Valley, PA. The waiting list for HUD is 3 years.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 185 – FR6075-N-01 – MH Significance	
Submitter:	145, 148, 155
Comment:	Many people rely on MH as an important source of safe, affordable housing, e.g., families who do not receive housing subsidies, young married people, retired people, seniors.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 186 – FR6075-N-01 – MH Significance	
Submitter:	129
Comment:	Kansas is a very rural state with a population of just over 2.9 million; the state median household income is $41,371, which significantly lags behind the national median income by $12,000; consequently, reasonably priced housing is important to all

	Kansans. There are currently over 60,000 manufactured homes in the state, spread over 81,000 square miles. KS has one manufactured housing facility left in state, and it employs 100+ Kansans. The Skyline plant builds both manufactured housing and modular housing and they ships their homes to nine other states. MH remains the only form of safe, unsubsidized, affordable housing available in Kansas and for every additional $1000 increase in cost, over 2,200 Kansans are priced out of purchasing a home.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 187 – FR6075-N-01 – MH Significance	
Submitter:	152
Comment:	OK has over 161,082 MHs, 9% of all housing units. There are 96, 872 homes on real property, which represents 61% of all MHs nationwide.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 188 – FR6075-N-01 – MH Significance	
Submitter:	137
Comment:	SC has the highest ratio of MHs of any state in the country—1-in-5 homes are MHs.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 189 – FR6075-N-01 – MH Significance	
Submitter:	156
Comment:	MH is important housing source across US, especially in AZ, due to rising housing/rental costs. AZ has more than 300,000 MH residences, mostly in suburban and rural areas.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 190 – FR6075-N-01 – MH Significance	
Submitter:	127
Comment:	According to US Census, MH was 1 out of every 5 new home starts in MS. MH continues to grow in MS with an increase of shipment of homes by 12% in 2017 from the previous year. Families choose our homes because they can buy a larger home to meet their family's needs for a much less cost. In MS, MH can be built for an estimated $50 per square foot compared to $80-$100 a square foot for site built homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 191 – FR6075-N-01 – MH Significance	
Submitter:	123
Comment:	MHs play an important role in meeting the nation's affordable housing needs and providing shelter following natural disasters and other catastrophic events.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 192 – FR6075-N-01 – MH Significance	
Submitter:	135
Comment:	MH has undergone significant improvements in quality and production times.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 193 – FR6075-N-01 – MH Significance	
Submitter:	145, 156
Comment:	MH is much less expensive on average than site-built housing.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 194 – FR6075-N-01 – MH Significance	
Submitter:	127
Comment:	MH provide many elderly citizens to continue independent living by purchasing a smaller MH and placing it near their family's home, which is much affordable than much assisted living.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 195 – FR6075-N-01 – MH Significance	
Submitter:	122
Comment:	HUD should reduce budgets and use a few million dollars to provide a 5-year program to educate media, local, state and federal officials, educators, and others about the facts

	and proper terminology related to manufactured housing. Doing so would save HUD billions, so it is an investment that would pay for itself. Given years of regulatory overreach and failure to enforce preemption and the MHIA 2000, it is only right to rebalance the scales and make such an investment.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 196 – FR6075-N-01 – MH Significance	
Submitter:	122
Comment:	Significant parts of the answer to solving the affordable housing crisis – using private capital that employ HUD Code manufactured housing - lies with HUD.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 197 – FR6075-N-01 – MH Significance	
Submitter:	149
Comment:	Many MH consumers are working American families who tend to have moderate incomes, live in rural areas, and cannot afford the cost of traditional onsite construction housing.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 198 – FR6075-N-01 – Review	
Submitter:	123

Comment:	HUD should maintain a balance and continue to facilitate consumer choice by ensuring any regulatory reform efforts do not favor manufactured homes over other types of residences, leading to consumer confusion and unfair competition in the marketplace.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 199 – FR6075-N-01 – Review	
Submitter:	020, 036, 135
Comment:	HUD's review is consistent with EOs 13771 and 13777, as well as efforts of the regulatory task force.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 200 – FR6075-N-01 – Review	
Submitter:	042, 131, 135
Comment:	HUD's review has the potential to ensure more Americans have access to a fair and efficient market that fosters the provision of affordable, high-quality manufactured housing, which enables first-time homebuyers, families, and retirees—often but not exclusively in rural areas—to obtain low-cost housing that is often cheaper than renting or purchasing a site-built home.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 201 – FR6075-N-01 – Review	
Submitter:	047, 052, 053 103
Comment:	HUD should take a holistic approach to not only its rule and program review, but how to best promote and support manufactured housing as a viable and valuable home choice option. HUD should pursue policy goals to streamline regulatory hurdles, such as differing installation standards from the Model Installation Program to that of FHA programs. HUD should take an aggressive stance to preserve the home choice rights of Americans who would like the option to consider a manufactured home.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 202 – FR6075-N-01 – Review	
Submitter:	103
Comment:	HUD should create a regulatory framework that encourages innovative ideas, new designs, and greater functionality as well as aesthetic home options will lead to greater homeowner satisfaction, and advance the public's understanding and perception of today's modern manufactured homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 203 – FR6075-N-01 – Review	
Submitter:	134
Comment:	Hopefully, this regulatory review will serve as a starting point for HUD to reexamine the program and recreate an atmosphere of communication and cooperation with all segments of the industry—encouraging innovation and resulting in high-quality and most-affordable housing product for working families nationwide.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	

Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 204 – FR6075-N-01 – Regulatory Overreach	
Submitter:	070
Comment:	The State of Nebraska is considering to no longer participate in the HUD program due to increased regulation within the program and a significant reduction in manufactured home production within the State of Nebraska. Increasing regulation from federal level is making it cost-prohibitive for Nebraska to stay in the program, and pushing the industry toward private companies. The following factors are affecting Nebraska's continued participation in the Federal Manufactured Home Program: • Enhanced Factory Certification and On-going Inspection Monitoring Requirement (established by HUD without public notice, comment and rulemaking) Part 3282 Subpart H • Monthly Monitoring Requirements • Outdated National Electric Code (NEC)- Part 3280.801(b)
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 205 – FR6075-N-01 – Regulatory Overreach	
Submitter:	131
Comment:	HUD's regulatory decisions have strayed from their statutory purposes as set forth in the National Manufactured Housing Construction and Safety Standards Act of 1974 and updated by the Manufactured Home Improvements Act of 2000 (42 U.S.C. 5401).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 206 – FR6075-N-01 – Regulatory Overreach	
Submitter:	053, 134
Comment:	The statutory language of the Manufactured Housing Improvement Act of 2000 was intended to ensure HUD focused on role to "facilitate the availability of affordable

	Manufactured homes and to increase homeownership for all Americans." Unfortunately, for nearly 20 years since the law was enacted, HUD has violated the MHIA—by ignoring legitimate recommendations of the MHCC for regulatory updates; by refusing to update outdated policies or interpretations of the regulations; and by stonewalling proposals which would have fostered growth and encouraged innovation in the industry. Instead, HUD has suppressed innovation, expanding its authority (and that of its contractors) into areas which are clearly the responsibility of the state; and reducing the Federal superintendence of the program through interpretations by staff that are clearly short of Congress's intent in the statute.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 207 – FR6075-N-01 – Regulatory Overreach	
Submitter:	134
Comment:	HUD's proposed actions—specifically the interpretive bulletin on installation of homes in areas subject to freezing climates; and changes proposed to the on-site completion/alternative construction approval process—have generally been excessive and arbitrary. They appear to have bee: offered without substantial need or merit; based on limited research; and offered without regard to the cost-benefit relationship for potential homebuyers. Commenter concurred with comments offered by MHARR and MHI.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 208 – FR6075-N-01 – Regulatory Overreach	
Submitter:	142, 143
Comment:	The regulatory climate is a factor in a huge downturn in the MH industry, particularly in the past 5-6 years [commenters provided data on Nebraska market].
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	

MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 209 – FR6075-N-01 – Regulatory Overreach	
Submitter:	135
Comment:	Several relevant HUD requirements are outdated, have increased compliance costs, and have created unnecessary burdens for lenders, suppliers, and builders. These issues have led to additional costs being passed onto consumers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 210 – FR6075-N-01 – Regulatory Burdens	
Submitter:	041, 045, 046
Comment:	The requirement to submit HUD-305, HUD-306, and HUD- 309 each time an owner/developer purchases, installs and rents or sells a manufactured home is onerous.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 211 – FR6075-N-01 – Review	
Submitter:	058, 142, 143
Comment:	The three main areas of regulation that need to be examined are the installation standards, the dispute resolution program, and the consensus committee.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	

Current Status:	Received by Secretariat.
DRC History:	

DRC # 212 – FR6075-N-01 – Regulatory Overreach and Guidance	
Submitter:	057, 074, 075 089, 093, 094, 097, 107, 111, 118, 020, 120, 127, 133, 136, 137, 144, 145, 147, 148, 149, 152, 153, 155, 156
Comment:	Recent HUD actions have expanded regulatory programs without evidence of necessity, with no clear benefit to consumers, and with no consideration of cost by, e.g., intruding into state functions, reinterpreting regulations to detriment of long-standing and accepted building practices, and unnecessarily limiting consumer choice and innovation, increasing costs, and limiting access to affordable housing. HUD should cease issuing controversial guidance letters which increase regulations without going through rule make process: HUD's "guidance" letters and memorandums, which have operated to change or add regulations, circumvent the rule making process and a more fully-informed process for regulation. (Commenter 111 describes examples: carports and awnings, foundation designs for homes placed in freezing climates, on-site construction.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 213 – FR6075-N-01 – Regulatory Burdens	
Submitter:	127
Comment:	More families would be choosing MH if some of the burdensome and unnecessary regulations which increase the cost were addressed.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 214 – FR6075-N-01 – Regulatory Burdens	
Submitter:	155
Comment:	Cost of a new single-wide MH has increased from $35k to $60+ in 3 years due mainly to HUD regulatory setup and inspection requirements that do not affect the livability or structural integrity of the home.

Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 215 – FR6075-N-01 – Regulatory Overreach	
Submitter:	155
Comment:	HUD creates new MH rules without considering effect on industry. The rules confuse contracted administrators and leave them without answers (e.g., they cannot give good answers to customers who want to install full foundational concrete slabs instead of partial minimum standard piers.)
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 216 – FR6075-N-01 – Regulatory Burdens	
Submitter:	155
Comment:	HUD MH regs are costly to the consumer and the taxpayer—the consumer has to pay needless installation costs, and the taxpayer has to pay HUD to hire independent administrators.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 217 – FR6075-N-01 – Regulatory Burdens	
Submitter:	155, 020
Comment:	HUD's MH regs deny low- and middle-class people a chance to own their own homes due to substantial increased costs.

Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 218 – FR6075-N-01 – Regulatory Burdens	
Submitter:	151
Comment:	The regulatory climate is a vital factor in a huge downturn in the manufactured home industry.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 219 – FR6075-N-01 – Guidance	
Submitter:	067
Comment:	HUD should withdraw or amend certain “field guidance” memoranda issued without MHCC consideration or other due process. (Commenter lists examples.)
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 220 – FR6075-N-01 – RV Rule	
Submitter:	002
Comment:	HUD should increase Park RV models from 325 sq ft to 538 sq ft, and should allow them to use for residential use. The loft area or exterior porches should not be included in the square footage calculation.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 221 – FR6075-N-01 – RV Rule	
Submitter:	040
Comment:	Having separate regulations for RV is an excellent idea. Regulations regarding RVs should now be more concerned with safety and improving roadworthy operation.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 222 – FR6075-N-01 – RV Rule	
Submitter:	087
Comment:	HUD's October 2014 Program Memorandum regarding RVs unnecessarily created a crisis for campgrounds, RV owners, and manufacturers. The memorandum reversed an interpretation these industries had relied upon for 15 years and, in the process, changed the definitions of a "house" and a "vehicle." As a result of the HUD memo, thousands of vehicles built in reliance on HUD's earlier guidance faced reclassification and a host of state and local regulatory requirements that apply to "houses." The Memo was reversed/withdrawn with the RV proposed rule.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 223 – FR6075-N-01 – RV Rule	
Submitter:	067, 087, 102, 109, 113, 128
Comment:	HUD should finalize its RV rule. HUD should not regulate RVs. In RV rule, HUD should clarify that OMH lacks authority over RV use. HUD should remove the phrase "vehicular

	structure" and substitute "vehicle" in the final regulation's definition of a "recreational vehicle." The final rule should incorporate broader reference to NFPA 1192 and ANSI A119.5 standards to acknowledge certainty of future updates. The Proposed Rule's added requirement that an ANSI A119.5-15 certified RV (a park model RV) contain a notice prominently displayed in the kitchen until completion of the sale is unnecessary. This disclosure is already implemented by industry. Moreover, the notice requirement was not in the MHCC recommendation.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 224 – FR6075-N-01 – RV Rule	
Submitter:	069
Comment:	The final RV rule should clarify that HUD's OMH does not have authority over the *use* of RVs. HUD should remove the phrase "vehicular structure" and substitute "vehicle" in the final regulation's definition of a "recreational vehicle." The final rule should incorporate broader reference to NFPA 1192 and ANSI A119.5 standards to acknowledge certainty of future updates. The Proposed Rule's added requirement that an ANSI A119.5-15 certified RV (a park model RV) contain a notice prominently displayed in the kitchen until completion of the sale is unnecessary. This disclosure is already implemented by industry. Moreover, the notice requirement was not in the MHCC recommendation.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 225 – FR6075-N-01 – RV Rule	
Submitter:	087, 102, 109, 113, 128
Comment:	HUD's 2016 proposed rule to redefine RVs using the MHCC recommendation provides for a simple, clear, and necessary distinction between MH and RVs. RVs are not housing. They are not housing; they are family camping vehicles. The fundamental difference between MH and RVs was, is, and always will be their design intent (recreational/camping/travel/seasonal use v. permanent dwellings). They do share a

	common ancestor in the mobile home/house trailer, but both industries have evolved along different trajectories. It would be inconsistent to regulate RVs as housing when all 50 states and DOT regulate them as vehicles, they are distributed through vehicle dealers, and licensed by state DMVs similar to auto dealers. RV industry operates on similar models to motor vehicle industry in terms of franchise laws, F&I regulations, finance forms and sources and practices, licensing, titling, and taxing (e.g., they have state-issued license plates). Recently, CFPB's Home Mortgage Disclosure Rule excluded RVs from the definition of Dwelling.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 226 – FR6075-N-01 – RV Rule	
Submitter:	128
Comment:	RVs should be built to DOT and ANSI/NFPA consensus standards. RVs include both motorized units (motorhomes) and travel trailers pulled behind a tow vehicle (travel trailers and 5th wheels, park models, and slide-in campers). RVs are already subject to extensive regulation by DOT as well as state motor vehicle and taxing authorities. For RVs, the NHTSA has primary authority over regulating safety codes for most RVs in its Federal Motor Vehicle Safety Standards (FMVSS). Along with NHTSA's FMVSS, the design standards for RVs built and certified in accordance with NFPA 1192-15 or ANSI A119.15 are appropriate for the RV industry.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 227 – FR6075-N-01 – RV Rule and Standards	
Submitter:	087, 109, 128
Comment:	HUD should not include specific editions of standards in its RV regulation, because it would take a separate rulemaking to update them when standards-setting orgs, e.g., NFPA and ANSI, update their standards every third year.
Statutory:	No
Subcommittee Recommendation:	

MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 228 – FR6075-N-01 – RV Rule	
Submitter:	087, 109, 128
Comment:	RV rule question 3 is inappropriate in this rulemaking, and HUD should not exercise any authority over Fifth Wheel RVs, which are vehicles, not housing, and they never meet the statutory definition of MH. HUD should make it clear that it has no authority to regulate 5th wheels.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 229 – FR6075-N-01 – Financing	
Submitter:	030
Comment:	An effective change in manufactured home financing would be the availability of 'rehabilitation/fix up' loans. There is an aging stock of manufactured homes that require significant work in order to qualify for financing. There is no program to bridge the gap between 'As Is' and 'As Will Be' as there is for site built homes. The absence of that type of loan makes many properties unsaleable except at severely discounted prices to investor type buyers. The absence of that type of loan program excludes most of the homeowner market from competing.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 230 – FR6075-N-01 – Financing	
Submitter:	135
Comment:	HUD should eliminate the FHA/Single Family Title II mortgage one-time move restriction and replace it with a requirement for an engineer's foundation and structural inspection following a move. This would provide access to existing MHs that borrowers cannot currently purchase through FHA loans.

Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 231 – FR6075-N-01 – Financing	
Submitter:	019,026
Comment:	HUD needs to allow a broader range of financing on single wide homes. Lenders typically do not allow any refinancing on a single wide home. This is burdensome for low-income individuals.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 232 – FR6075-N-01 – Financing	
Submitter:	135
Comment:	HUD should eliminate the tiered pricing structure and allow lenders greater flexibility with respect to the Mortgage Charge Rate. The current rule disincentivizes lenders from originating smaller-balance loans. An average sales price of a manufactured home is currently $70,600, with single-section homes averaging $46,700 and multi-section homes averaging $89,500. The relatively low balances on these loans are often inadequate to support reliable production given the relatively high fixed origination costs for lenders, which now average over $8,000 per loan (across all types of loans).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 233 – FR6075-N-01 – Financing	
Submitter:	135

Comment:	HUD should require all MH home title evidence to be completed at closing and make that process a condition of closing so that it is completed properly at that time. [Commenter explains requirement underlying this recommendation.]
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 234 – FR6075-N-01 – Financing	
Submitter:	019
Comment:	HUD needs to allow financing on single wide homes. No financing company allows refinancing on single wide homes. This limits opportunity for low-income individuals to lower monthly payments, and results in foreclosure.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 235 – FR6075-N-01 – Financing	
Submitter:	096
Comment:	While Fannie Mae and Freddie Mac do make conventional loans on manufactured housing, finding a lender to do so can be a challenge. Lenders are often resistant to prove financing for manufactured homes because manufactured housing standards are not as stringent as those for site-built homes. The same applies to the insurability of manufactured homes; they are often perceived as a higher risk compared to site-built homes. Lenders and insurance providers discriminate against manufactured homeowners; deregulation of manufactured home construction and safety standards will amplify these discriminatory practices, making it more difficult for low and moderate-income families to afford housing.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.

DRC History:	

DRC # 236 – FR6075-N-01 – Financing	
Submitter:	086
Comment:	HUD should reform the way MH is appraised. Today's HUD code manufactured homes should appraise by square foot relative to the housing market. They are built as well or better than many stick built homes and should not suffer from the anecdotal stigma attached to affordable housing and those who choose to live in it.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 237 – FR6075-N-01 – Financing	
Submitter:	016
Comment:	HUD should relax the age requirement of FHA loans by allowing older mobile homes to obtain financing. HUD did a cut off for financing at June of 1976. There are older mobiles homes that are in great condition, and should not be ineligible for FHA loans as it limits options for buyers and sellers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 238 – FR6075-N-01 – Financing	
Submitter:	116
Comment:	Cross involvement with the FHA and VA to make a unified installation program to gain better access to better loan products for manufactured home purchasers. If the installation of the home is held to a better standard and fully inspected to the Federal construction and installation requirements then Federal supported lending installations should open more and cheaper lending option to Manufactured home buyers which will increase affordability. The test UDSA Rural Loan program has made a HUD 309 inspection part of the new home loan program. FHA should also have the same type of program this would greatly improve affordability. This could also be done with land lease communities under existing programs with just a little change to the normal land leases and this too would improve affordability.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 239 – FR6075-N-01 – Financing	
Submitter:	121
Comment:	HUD should ensure consistent standards across the United States to encourage wider acceptance of manufactured homes by consumers, local land use officials, lenders and secondary market participants. For example, Fannie Mae, Freddie Mac and the USDA are working to expand their loan products for manufactured homebuyers. HUD should not simply devolve oversight to industry, a practice that would jeopardize progress in home loan access.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 240 – FR6075-N-01 – Financing	
Submitter:	122
Comment:	HUD must begin thinking about how the underutilization of the FHA Title I and Title II programs is harming the industry. Making changes could address many of the issues that 'other forces' – inside and outside of the federal government - have sadly used to marginalize the Duty to Serve (DTS) process. • The combination of regulations, • Unnecessarily constricted capital and credit, • Berkshire Hathaway 'moat' and 'anti-competition' – with allegations and documents, as reported, • failure to address misconceptions, • improper Census Bureau census data, that lump manufactured housing in with pre-HUD Code mobile homes, • all of these are items that HUD has an ability to influence without legislation being needed.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	

Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 241 – FR6075-N-01 – Financing	
Submitter:	135
Comment:	HUD should streamline the process by which the engineer's certification is obtained, thereby reducing costs for lenders and consumers. The cost associated with obtaining the engineer's certification is higher than necessary due to lack of efficiency and harmonization across markets. Various rules and requirements (e.g., certification can be required at underwriter's discretion, when called for by the appraiser, or when appraiser notes additions or alterations to the unit and the state does not employ inspectors; installer must follow approved mfr installation instructions for items covered by Model Standards, unless variations made to the instructions [commenter gives examples], and even in those instances, an installer must first attempt to obtain alternate Design Approval Primary Inspection Agency (DAPIA)- approved designs from mfr or use alternate design prepared and certified by a mfr-approved professional engineer or architect; [commenter lists other examples].
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 242 – FR6075-N-01 – Financing	
Submitter:	138
Comment:	With the growth in housing costs, combined with the recent implementation of the Enterprises' Duty to Serve plans, which will expand financing options through pilot chattel programs and increased purchase of real estate-titled manufactured home loans, the industry is poised to offer millions of more families the opportunity to own a safe and durable home.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 243 – FR6075-N-01 – Financing	
Submitter:	012, 035

Comment:	Banks are unwilling to lend money to owners of manufactured homes. Owners of manufactured homes cannot even seek a line of credit.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 244 – FR6075-N-01 – Financing	
Submitter:	004, 011
Comment:	Mortgage financing for manufactured homes should be put more on an equal playing field to stick built homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 245 – FR6075-N-01 – Financing	
Submitter:	103, 134
Comment:	HUD/state authority over installation should be recognized throughout the Department (FHA Title I and Title II). HUD should advocate for the acceptance of homes installed to the Model Installation Standards or those standards promulgated and enforced by states with approved state plans in mortgage programs offered throughout the Department and other government-sponsored enterprises (Fannie, Freddie, Ginnie, VA, USDA).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 246 – FR6075-N-01 – Financing	
Submitter:	131

Comment:	HUD should review its FHA financing programs for consumers seeking to achieve homeownership by purchasing a manufactured home. Close to 70 percent of manufactured housing is financed as chattel, or home only loans. These homes tend to be sited on land that is already owned by the borrower or a family member, or in land lease communities. Yet, chattel home financing options are limited. Lenders tend to keep loans on portfolio, as there is no secondary market and no meaningful government backed mortgage insurance program. In fact, according to HUD data, in 2014, FHA endorsed only $24 million in Title I manufactured home loans. According to Ginnie Mae, there are only 3,900 active manufactured housing chattel loans in Ginnie pools. As a result, because lenders retain all the risk, interest rates tend to be higher than for real estate sited homes that have the benefit of a secondary market. HUD should change the FHA Handbook as well as other broader policy changes, which, if implemented, will improve the accessibility of the FHA Title I and Title II programs and make it a more viable option for lenders and borrowers. (Commenter describes examples of such changes: Modify Origination Fee Structure; Improve the Chattel Appraisal Process; Adjust Title I Manufactured Loan Limits for Inflation; Reduce Annual and Upfront Loan Insurance Premiums for Title I; Foundation Requirements Should be Consistent with Installation Standards; Definitions of "Existing Manufactured Home" and "New Manufactured Home" should be consistent with regulatory definitions used in the HUD Manufactured Housing Programs (24 CFR Parts 3280, 3282, 3285, and 3286); Require HUD Installation Standards across Title I and Title II Manufactured Homes; Direct Endorsement for Title I Chattel Lenders).
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 247 – FR6075-N-01 – Formaldehyde	
Submitter:	052, 053, 067, 103, 131, 134
Comment:	The Important Health Notice (Formaldehyde Warning) requirements should be eliminated or substantially updated to reflect compliance with emissions in a more-positive statement. With the Formaldehyde Emission Standards for Composite Wood Products Act of 2010 and resulting Environmental Protection Agency 2017 rules on formaldehyde emissions from certain wood products produced domestically or imported into the United States, the current disclosure requirements in 24 CFR 3280.309 are obsolete and outdated. The composite wood standards that apply to all manufacturers who utilize composite wood in the U.S. are sufficient and should be evenly applied without the need for additional and outdated disclosures. The health notice requirement imposes an unwarranted, unjustified and discriminatory burden on MH.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	

MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 248 – FR6075-N-01 – Formaldehyde	
Submitter:	131
Comment:	The HUD Code needs to be updated, as required by law, to reflect the new emissions limits and definitions of the final EPA formaldehyde standards rule.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 249 – FR6075-N-01 – Dispute Resolution	
Submitter:	054, 058, 142, 143
Comment:	The dispute resolution program is regulation overkill. The commenters' state agency has not had a complaint in 5 years. The costs of the program (e.g., from HUD's budget) should be assessed as compared with the benefits—it can't be a good cost-benefit ratio. Only 9 complaints were handled by the program in 2017, and all were handled before they got to the program, and that was just in the 14 states that lack a state complaint program.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 250 – FR6075-N-01 – Dispute Resolution	
Submitter:	121
Comment:	The dispute resolution program, though small, serves an important purpose in ensuring consumer satisfaction in 26 states (and D.C.). It has addressed complaints ranging from heating and cooling issues to concerns about the building envelop. The process has mediated complaints, and is an important resource for consumers, advocates, government and industry.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 251 – FR6075-N-01 – Dispute Resolution	
Submitter:	151
Comment:	HUD should look at the costs and benefits of the dispute resolution program. Has it been used? How much money is being spent on it? This commenter's state agency has not had a complaint in 5 years.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 252 – FR6075-N-01 – Dispute Resolution	
Submitter:	052, 053, 150, 064,
Comment:	The dispute resolution program (which is statutory, not regulatory) has been a waste of time and taxpayer money since its inception, due to minimal filing of dispute issues. Today's manufactured homes are generally superior in construction quality than forebear "trailers" of the 1960s and "mobile homes" of the 1970s.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 253 – FR6075-N-01 – Dispute Resolution	
Submitter:	131
Comment:	Non-use of the costly DRP demonstrates that the manufactured housing industry is clearly providing a quality product to consumers and has an excellent track record of resolving complaints. Given that this is an expensive process without any real value or

	consumer benefit, taxpayer dollars would be better utilized elsewhere, such as ensuring the HUD Code is updated much more frequently.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 254 – FR6075-N-01 – OMHP Administration	
Submitter:	131
Comment:	Some of the MH regulatory problems are the result of the manufactured housing program's low priority placement within the Department's organizational hierarchy. The Office of Manufactured Housing Programs (OMHP) is not well positioned within HUD to ensure that manufactured housing is at the center of policy discussions surrounding the Department's affordable housing mission. Because it is buried deep within HUD's bureaucracy, when discussions are held regarding the shortage of affordable housing, the important role of manufactured housing is often not a part of the conversation. Because manufactured housing provides unsubsidized, safe and affordable housing to low- and moderate-income people, the regulation of manufactured housing within HUD should be elevated from its current location within the Department so that it is on par with other forms of housing.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 255 – FR6075-N-01 – OMHP Administration	
Submitter:	138
Comment:	Leadership of the Office of Manufactured Housing Programs should not be politicized. OMHP should be lead objectively, with deep appreciation of the vital role that manufactured housing plays in providing safe and affordable homes to low- and moderate-income families. Regulatory review poses a critical test for OMHP and HUD -- whether it can effectively balance the calls for regulatory expediency with the purposes of the NMHCSS which protect the hardworking families who live in manufactured homes, and the communities that rely on manufactured homes for safe, affordable and stable housing.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 256 – FR6075-N-01 – OMHP Administration	
Submitter:	067, 107
Comment:	HUD should fundamentally modify the program monitoring contract and monitoring contract process. OMH career staff and contractors have needlessly expanded regulation and the scope of their authority, increasing the cost of the program and benefiting the incumbent 40+-year contractor, to the detriment of would-be homebuyers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 257 – FR6075-N-01 – OMHP Administration	
Submitter:	064, 150
Comment:	HUD should reform contracting requirements. Pricing and competition can be improved, and HUD's present code enforcement contractor has been in place for more than 40 years. HUD not openly soliciting proposals from competing contractors is a potential or blatant waste of taxpayer money.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 258 – FR6075-N-01 – OMHP Administration	
Submitter:	064, 150
Comment:	HUD should appoint a new, non-career administrator over the MH program. This person should be a business person with a mandate to reduce the cost of MH to prospective homebuyer/site lessees (i.e., homebuyers purchasing MHs to be installed or that are

	already sited on rental homesites within one of 50k+ land lease communities nationwide) and homebuyers preferring scattered building site installation.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 259 – FR6075-N-01 – MHIA Implementation	
Submitter:	064, 150
Comment:	HUD should press for full implementation of the Manufactured Housing Improvement Act of 2000. It is hard to believe HUD let this forward-looking legislation-cum-regulation languish for 18 years in the face of increasing public clamor for more affordable housing. HUD should reposition MH alongside subsidized housing as an answer to this clamor.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 260 – FR6075-N-01 – States	
Submitter:	131
Comment:	Recent actions by HUD are an effort to usurp state and local authority so it can regulate the installation of manufactured homes at the federal level. HUD should review its approach to installations and consider the motives behind recommendations from contractors that will make more money if they cause more compliance and regulation burdens for the industry. HUD should respect currently approved state programs that have engineering and proven performance behind their installation designs. (Commenter describes inspectors' meeting, noting that during the meeting, the contrast between the HUD-Administered installation program and state administered installation programs was quite pronounced.) HUD's contractor claimed that 98 percent of the homes that were inspected in the prior year required corrections, such as home siting and foundation issues, inadequate crawl space ventilation, and lack of reporting, his review was not a representative, random sample of homes in the HUD-Administered states. By inspecting homes reported as having problems as opposed to ensuring the sample was representative of the population of new manufactured homes in HUD-Administered states, it is inevitable that selection bias would result such a high finding of failure. HUD is engaging with contractors that are willing to produce findings that are unrepresentative and skewed to justify HUD's further overreach in the area of

	installations. HUD should not tolerate such overstatements by its contractors and should not go beyond statute when it comes to its responsibility for installations.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 261 – FR6075-N-01 – States	
Submitter:	155, 156
Comment:	HUD should better support states in their regulatory efforts.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 262 – FR6075-N-01 – States	
Submitter:	007, 049
Comment:	There is no need for HUD regulation when state and local laws can regulate manufactured housing. HUD should eliminate unnecessary regulations.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 263 – FR6075-N-01 – States	
Submitter:	134
Comment:	HUD should remove the confusing conflict of interest references from the “State Plans” Section of the regulations and from the applications for approval or reapproval of state plans and state administrative agencies. The scope of “Conflict of Interest” provisions in 3282.359 on agencies/board under state authority—expressly intended for personnel of

	IPIAs and DAPIAs--should be revised. HUD's interpretation as applying to individuals selected to serve on advisory boards and commissions for state-level agencies that administer Federal AND state laws and regulations governing manufactured home construction, transportation, sales, and installation—is unnecessary, arbitrary and does nothing to enhance the protection of customers, the resolution of disputes, or any other regulatory activity which HUD might apply or enforce. The interpretation does, however, prevent otherwise qualified and interested individuals with industry knowledge from serving on such boards or commissions.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 264 – FR6075-N-01 – States	
Submitter:	067
Comment:	HUD should adopt revised regulations for increased payments to state administrative agencies.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 265 – FR6075-N-01 – Standards for Review	
Submitter:	091
Comment:	HUD should consider for review: 24 CFR sections 3282(c) Production Surveillance; 3282.361 DAPIA; 3282.416 Monthly File Review; 3282.362 IPIAs and Certification Report; and 3284.10 Manufactured Housing Program Fee/Payments to States
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 266 – FR6075-N-01 – Regulatory Benefits	
Submitter:	037
Comment:	HUD regulations is needed for manufactured housing specially to protect the elderly. There are issues that are facing manufactured housing especially without any robust regulation such as homes sinking as cement pads not inspected properly, homes not installed properly are separating, furnaces not properly installed, and homes not inspected and installed poorly resulting in mold and mildew issues
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 267 – FR6075-N-01 – Regulatory Benefits	
Submitter:	078, 092, 096, 098, 100, 101, 132
Comment:	EO 13771 claims to identify and eliminate inefficient regulations, it has the potential for having adverse effects for beneficiaries of those regulations. HUD should not repeal regulations on construction and installations of any kind—even more now than ever due to climate change. HUD should think about the wellbeing of MH owners and their families, some of whom are elderly and/or vulnerable, and their ability to have safe, affordable homes to live in. HUD should prioritize needs of residents, not industry lobbyists or corporate community owners. Because current federal Manufactured Home Construction and Safety Standards fall below construction and safety standards of site-built homes, there should be more stringent regulations, not a move toward deregulation. Deregulation of manufactured housing compromises the health and welfare of those living in these homes because it has the potential of reducing construction and safety standards of these homes. Additionally, deregulation of manufactured housing is increases discriminatory practices of financing and insuring these homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 268 – FR6075-N-01 – Regulatory Benefits	
Submitter:	125

Comment:	HUD should expand government oversight and protections that promote the safe construction and installation of homes, increases energy efficiency standards and enact building codes that allow for manufactured homes to be more resilient to worsening climate disasters.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 269 – FR6075-N-01 – Regulatory Benefits	
Submitter:	125
Comment:	HUD should further develop protections that ensure MH living continues to be safe, viable, and affordable. Regulatory review must adhere to the strict criteria of protecting the economic and retirement security of families who rely on MH for shelter, namely low-income and immigrant workers, veterans, seniors on fixed incomes, and people living with disabilities.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 270 – FR6075-N-01 – Regulatory Benefits	
Submitter:	124
Comment:	The HUD Code constitutes a highly efficient and cost effective regulatory approach to production of safe, affordable, non-subsidized housing in the United States. The HUD Manufactured Housing Program in its current form offers a model of success for low regulatory burdens far beyond traditional site-built housing approaches. Revisions to the current HUD Manufactured Housing regulatory framework should be evolutionary in nature rather than revolutionary. The Manufactured Housing Program and the housing it enables is vital to the on-going availability of a full portfolio of safe and affordable single-family housing options that meet market needs across the United States. [Commenter provides chart comparing MH requirements to site-built requirements]. The above comparison highlights the fact that the HUD administered program is successful, and through the evolution of the regulatory program, the manufactured home industry has come a long way. Therefore, manufactured homes are becoming a housing of choice for people of moderate income.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 271 – FR6075-N-01 – Regulatory Benefits	
Submitter:	125
Comment:	The HUD program relies upon industry, the private sector, states and HUD to work cooperatively. It is achieving the goals set in the law; deregulation at the federal level without studying its impact on other partners may adversely impact the gains which this complex and efficient program has helped to achieve.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 272 – FR6075-N-01 – Regulatory Benefits	
Submitter:	123
Comment:	While HUD should reduce unnecessary, duplicative, job-killing regulations that inhibit construction or preservation of affordable housing, it should avoid any policy that may give one type of housing an unwarranted competitive advantage in the marketplace. Regulatory costs are one of the most significant factors that drive the price of a new home. On average, regulations imposed by all levels of government account for 24.3 percent of the sales price of a new single-family home. However, any reform that impacts only a subset of an industry, such as the one being considered in this notice, has the potential to throw the market off kilter and result in undesirable impacts. As such, HUD is strongly urged to exercise caution as it identifies opportunities for reform. While the HUD Code, like those enacted at the state and local levels, needs to be updated periodically so that it reflects current practice and technology, the Department must refrain from making any changes that would result in furthering the divide between the code requirements for manufactured homes and those that apply to homes that are stick-built or built using engineered building systems. Building codes have a significant influence on not only occupant health and safety, but also on overall housing costs. Skewing the requirements so they favor one type of housing over another could mislead homebuyers and result in an unfair competitive disadvantage for other sectors of the home building industry.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 273 – FR6075-N-01 – Regulatory Benefits	
Submitter:	121
Comment:	HUD should cautiously approach delaying or repealing any guidance or rule simply to meet an arbitrary target on the number of regulations. Highlighting best practices by industry or the states, as trade groups propose, is in direct conflict with the Act's intent and language, and is no substitute for HUD compliance with the law through Federal rulemaking and enforcement.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 274 – FR6075-N-01 – Regulatory Benefits	
Submitter:	072, 141
Comment:	The safety and welfare of manufactured homeowners will be threatened by HUD deregulation of the rules governing manufactured houses.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 275 – FR6075-N-01 – Regulatory Benefits	
Submitter:	141
Comment:	Manufactured homeowners need homes that are reliable and safe and to reduce the construction and/or installation requirements jeopardizes this. Our homes need to withstand high winds, hurricanes, and other natural disasters as much as stick built homes. MH regulations should be the same or better as for those of stick built homes in our areas. MHs need to have more stringent rules governing sealing of windows, and

	skylights to prevent condensation and damage to MHs. MHs should be better insulated so that you can't feel the cold when you are inside and touch an outside wall. MHs need to be installed correctly and not start showing cracks where they are were put together. They need strong vapor barriers under the homes so that moisture, mold and mildew do not develop and cause sickness and high cost repairs to homeowners. “Our roof leaked resulting in major repairs and the need to replace a roof bearing beam. Our hot water heater leaked damaging not only our rugs but the flooring below. Hot water heaters should not be enclosed in closets! We had a faucet leak in a guest bath tub but there was not access to the pipes which were inside an enclosed wall. We have the same problem in our master bath tub. Also, one end of our house is much warmer. This may be contributed to where the main heater is located and poor design. It takes about 10 minutes for the water to heat up in our master bath so showers can be taken. These problems cause higher heating and water bills every month than are necessary. Our neighbors have had skylights that leak; windows that fog up; mold and mildew under the house....we as manufactured homeowners are having REAL PROBLEMS!”
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 276 – FR6075-N-01 – Regulatory Benefits	
Submitter:	141
Comment:	HUD should avoid MH deregulation and look at instituting more stringent rules and strengthening those now on the books.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 277 – FR6075-N-01 – Regulatory Benefits	
Submitter:	141
Comment:	The HUD Maps used for natural hazards need updating (frostline and depth; flood zones; high wind zones, etc.). Updating these maps is essential to ensure homes are built to the highest standards for the areas where people reside.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 278 – FR6075-N-01 – Regulatory Benefits	
Submitter:	139
Comment:	The MH industry will ultimately benefit from greater public acceptance via better-quality homes, well-trained inspectors, and enforcement of both production and installation standards.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 279 – FR6075-N-01 – Regulatory Benefits	
Submitter:	038, 043, 138
Comment:	Manufactured homes can provide long term, safe, durable and affordable housing for working families in communities nationwide. HUD should not give into regulatory expediency, and remain objectively focused on the durability, quality and affordability of manufactured homes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 280 – FR6075-N-01 – Regulatory Benefits	
Submitter:	138
Comment:	Because manufactured homes are built to a federal pre-emptive standard, a robust regulatory structure is critical to ensuring that homes are installed properly, and that they are completed on site in accordance with HUD approved designs.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 281 – FR6075-N-01 – MHCC	
Submitter:	067
Comment:	HUD should withdraw its 2010 interpretive rule regarding the statutory role of the MHCC.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 282 – FR6075-N-01 – MHCC	
Submitter:	125
Comment:	HUD should appoint manufactured homeowner voices on the Manufactured Housing Consensus Committee (MHCC). In addition, HUD must respect the viewpoints and authority of the MHCC to ensure that regulatory decisions are not overrun by industry interests seeking to undermine oversight procedures and regulatory standards.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 283 – FR6075-N-01 – MHCC	
Submitter:	131
Comment:	No changes should be made to the HUD Code without input from the MHCC and without adequate cost-benefit analyses. The program's memos, actions, interpretive bulletins, and directives should all be reassessed as a part of this comprehensive review to ensure the appropriate cost analysis, testing, and research was conducted prior to imposing such requirements. As it stands the past lack of cost analysis has resulted in

	changes to the Code that have driven-up costs without a clear justification that the changes will lead to improvements that are in the best interest of consumers.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 284 – FR6075-N-01 – MHCC	
Submitter:	127
Comment:	In 2007, MS MH Association requested HUD adjust the wind zone designation (from Wind Zone II to III) of the six southernmost counties in the state of MS (Pearl River, Stone, George, Hancock, Harrison, and Jackson), because of their susceptibility of hurricanes in the Gulf of Mexico, pursuant to section 3280.305 of the federal MH construction and safety standards. It stated HUD should place the modification on the May 2007 MHCC meeting agenda, and in the event the MHCC cannot act on, or reach a decision on this matter at the meeting, pursuant to section 604(b)(5) of the MH Improvement Act of 2000, the secretary should promulgate the modification as an emergency measure, as quickly as possible. MHCC passed on the request, and HUD did not act further.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 285 – FR6075-N-01 – MHCC	
Submitter:	142, 143, 151
Comment:	Regulators do not pay attention to the MHCC, and there are too few industry members.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 286 – FR6075-N-01 – MHCC	
Submitter:	142, 143
Comment:	If HUD isn't going to pay attention to the MHCC, it should dissolve the committee and save the money.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 287 – FR6075-N-01 – Land	
Submitter:	015
Comment:	It is hard to find land to place a manufactured housing due to local laws and zoning restriction.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 288 – FR6075-N-01 – Land	
Submitter:	010, 036
Comment:	HUD needs to regulate and set fairness standards on park owners/operators before implementing other changes (i.e. mortgages, quality of home) that can increase mobile home living as a viable option to the affordable housing crisis.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 289 – FR6075-N-01 – Land	
Submitter:	026
Comment:	Support and establish loan products that would help residents purchase their community when park owners are trying to price them out of the market place.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 290 – FR6075-N-01 – Land	
Submitter:	026
Comment:	The primary issue is no new land to accommodate MH—federal incentives should encourage new development of such land.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 291 – FR6075-N-01 – Land	
Submitter:	026
Comment:	HUD should develop and institute federal incentive programs that would encourage the development of new manufactured home Land.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 292 – FR6075-N-01 – Land	
Submitter:	125

Comment:	Over the past 20 years, manufactured home communities increasingly have gone from "mom and pop" enterprises to ownership by large, multi-state corporations and private equity. The increase of multi-state, corporate ownership has brought with it an unsustainable business model based on rapidly escalating lot fees and decreasing investments in community maintenance. This creates an economic trap for homeowners, who are unable to move their home for structural or regulatory reasons and therefore must either pay increasingly high lot fees or abandon their property.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 293 – FR6075-N-01 – Land	
Submitter:	125
Comment:	Cost cutting by corporate owners also leads to decreasing investment in community maintenance resulting in increased wastewater treatment/septic system failures, improperly maintained roads and other infrastructure issues. Each act of disinvestment increases the economic, health and safety risks for manufactured homeowners and negatively impacts the quality of life of the surrounding community.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 294 – FR6075-N-01 – HUD Initiatives	
Submitter:	125
Comment:	HUD should promote community ownership models that provide for fair and reasonable lot-rents transparency in terms of community infrastructure plans in land-lease communities. HUD should aggressively work to promote the following land-lease community ownership models: cooperatively ownership, non-profit ownership and public ownership. Expanding the scale and reach of these ownership models would better guarantee that the needs of homeowners and residents would trump the greed-driven interests of corporate shareholders.
Statutory:	No
Subcommittee Recommendation:	

MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 295 – FR6075-N-01 – HUD Initiatives	
Submitter:	125
Comment:	HUD should enforce and expand fair housing law and fair mortgage lending practices.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 296 – FR6075-N-01 – HUD Initiatives	
Submitter:	026
Comment:	Support and fund programs such as Next Step, an organization working to replace the remaining 2 million mobile homes in the U.S. built prior to 1976 with energy-efficient options.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 297 – FR6075-N-01 – DOE Rule	
Submitter:	121
Comment:	HUD should work with DOE to ensure effective implementation of a final rule version of the 2016 proposed rule. This will benefit new homebuyers by significantly improving energy efficiency of manufactured homes, standards for which have not been meaningfully updated since 1994. Appraisers and lenders will likely improve practices and expand programs to help buyers capture this value, an option long available to site-built home buyers.
Statutory:	No

Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 298 – FR6075-N-01 – Deregulation Consequences	
Submitter:	139
Comment:	Commenter and other advocates (affordable housing and low-income weatherization) are concerned that HUD's review will lead to a weakening of HUD construction and home installation standards, namely certain rules involving the final installation of manufactured homes on permanent sites. Local land use and zoning officials would be even more skeptical of manufactured housing because of this retreat by HUD. The net effect will make it more difficult for income-qualified families to find and live in affordable housing through manufactured homes. HUD should therefore resist industry pressure to lessen manufactured building codes.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

DRC # 299 – FR6075-N-01 – Permits	
Submitter:	013
Comment:	There are some impediments to build affordable housing in Los Angeles County, CA (e.g. if someone owns a 30-acre land only 15 units are allowed to be built as opposed to more units that are allowed in some other states). Additionally, if someone applies for conditional use permit (CUP), then 60 units, or one unit per acre is permissible. The application for such CUP is $13,000.
Statutory:	No
Subcommittee Recommendation:	
MHCC Action:	
MHCC Reason:	
Cost Impact Explanation:	
Current Status:	Received by Secretariat.
DRC History:	

Appendix A - Submitter Cross Reference for FR 6075 Comments:

SUBMITTER NAME	SUBMITTER NUMBER
R Wolf	2
Dan Lourenco	3
Sheryl Laskie	4
Caroline Gerardo	5
Kimm Bilisko	6
Timothy Powers, Residential Skirting Products, Inc.	7
Brenda Turck	8
Roberta G.	9
Simone Balkema	10
Julie Gilbert, RE/MAX River City	11
Mike Nelson	12
Asim Altamimi	13
Robin Schwartz	14
Kathie Hatch	15
Debby Eller	16
Greg Zadel	17
Travis Phillippi	18
Tonia Ladd	19
Stephanie Reeves	20
Robert Morris	21
Shannon Williard	22
Richard Newton	23
Mark Altmar	24
Mary Calabro	25
JoAnn Donohue	26
Eileen Waller	27
Julie Roberson	28
Joanne Rush	29
James Wilcox, Columbia River Properties	30
John Overmier	31
Wendy Jones	32
Alice Taylor	33
James Gilliam	34
Joel and Navey Mercado	35
Stephanie Reeves	36
Sandra Overlock, The Manufactured Home Federation Of MA, Inc.	37
Paul R. Andrews	38
Steven Gerike	39
Anonymous	40
Richard Freedman, Garden Homes Management Corporation	41
Wayne Rose	42

Diane Hanson	43
Chris Larsen	44
Jimmy Fecteau	45
Randy Rouleau	46
Stephanie Stupakis	47
Eddie Hilliard	48
Lawrence Boutillette, Rebuilding Together Saratoga County	49
Snake Rainlord	50
Ronald Anderson	51
Laurie Mercurio, Tomorrows Home Foundation	52
Amy Bliss, The Wisconsin Housing Alliance	53
Maida Swenson- Fortune, Sage Asset Management	54
Aashish Shahani	55
Brandon Schwartz	56
Mass Mail Campaign 1: Kurt Wilkerson, Total as of 2/27/2018: 284	57
Justin Burgess, Hinn's Homes, Inc.	58
Mary Gaiski, Pennsylvania Manufactured Housing Authority	59
Mary McBrady, Massachusetts Manufactured Housing Association	60
Brad Shechtman, American Mobile Home Communities, LLC	61
Dale Azaria, Vermont Department of Housing & Community Development	62
Ben Roche	63
George Allen	64
Mark Conte, Conte Manufactured Housing Compliance Services, LLC	65
Jeff Luellen, Land MHC, LLC	66
Mark Weiss, Manufactured Housing Association for Regulatory Reform	67
Steven Lefler	68
Michael Ochs, RV Industry Association	69
Mark Luttich, Nebraska Public Service Commission	70
Daryel Lacy	71
Patti Rose	72
Melissa Whitlow, Virginia Housing Development Authority (VHDA)	73
Glenn Scowcroft, Glen-Aire Mobile Home Park	74
Ed Rivkin	75
Kyle Pitsor, National Electrical Manufacturers Association	76
Charles Russell, Manufactured Home Federation of MA	77
Norbert Snow	78
K. Newcomer	79
Darlene Dougherty	80
Henry Greene, California Department of Housing and Community Development	81
Henry Greene, California Department of Housing and Community Development (2nd Comment)	82
Henry Greene, California Department of Housing and Community Development (3rd Comment)	83
Henry Greene, California Department of Housing and Community Development (4th Comment)	84
Henry Greene, California Department of Housing and Community Development (5th Comment)	85
Thomas Christ	86

Phil Elam, The Texas Recreational Vehicle Association (TRVA)	87
Henry Greene, California Department of Housing and Community Development (HCD) - 6th Comment	88
Steve Bearry, Oliver Technologies, Inc.	89
Henry Greene, California Department of Housing and Community Development (6th Comment)	90
Steve Hibner, Manufactured Housing & Modular Building Section	91
Marlene Alfieri	92
Mark Brunner, Maufactured & Modular Home Association of Minnesota	93
Kristian Jensen, III, Jensen Communities	94
Angela Ryan	95
C. Duncan	96
Michael Douglas	97
Clara McNichol	98
Frank Krzywda, Member of Manufactured Home Federation of MA	99
Robert Ray	100
Bonnie Downs	101
Jeff Sims, National Association of RV Parks & Campgrounds	102
DJ Pendleton, Texas Manufactured Housing Association	103
Soheyla Kovach	104
Henry Greene, California Department of Housing and Community Development (HCD)- 7th Comment	105
Henry Greene, California Department of Housing and Community Development (HCD)- 9th Comment	106
James Ayotte, Florida Manufactured Housing Association	107
Marla McAfee, Tennessee Housing Association	108
Ronald Breymier, Indiana Manufactured Housing Association Recreation Vehicle Indiana Council (IMHA-RVIC)	109
Frank Bowman, Illinois Manufactured Housing Association	110
John Weldy, Clayton Home Building Group	111
Lowell Ungar, American Council for an Energy-Efficient Economy	112
Heather Leach, The Pennsylvania RV and Campground Association (PRVCA)	113
Karen Soucy, NH Manufactured & Modular Housing Association	114
Henry Greene, California Department of Housing and Community Development (10th Comment)	115
Michael Henretty	116
Fanyu Lin, Fluxus, LLC	117
Lance Latham, Alabama Manufactured Housing Association	118
Manuel Santana, Cavco Industries, Inc.	119
Jayar Daily	120
Doug Ryan, Prosperity Now	121
L. A. 'Tony' Kovach, LifeStyle Factory Homes, LLC	122
Susan Asmus, National Association of Home Builders	123
Wesley Geertsema	124
Kevin Borden, MHAction	125
Stacey Epperson on behalf of Next Step Network, Inc.	126
Jennifer Hall	127
Brett Richardson, National RV Dealers Association	128
Martha Smith	129
James Schmitz	130

Lesli Gooch, Manufactured Housing Institute (MHI)	131
Linda Reynolds	132
David Lentz, Green Courte Partners, LLC	133
J.D. Harper, Arkansas Manufactured Housing Association	134
Andrea Oh, Mortgage Bankers Association	135
Phil Copeland, Champion Home Builders, Inc.	136
Shell Suber	137
Grant Beck, Next Step Network, Inc.	138
Brian Pine, The Vermont Energy Investment Corporation (VEIC)	139
Seth Statler, The National Fire Protection Association (NFPA)	140
Vincent Rice	141
Martin Huff, Nebraska Manufactured Housing Association	142
Kenneth Sanders, Kingswood Estates & West Park Plaza MHC	143
Kenneth Hauck	144
Sheri Campbell, Preferred Homes	145
Jerry Vogeler, South Dakota Manufactured Housing Association	146
James Dougherty, Community Management Group	147
Justin Glaze, Hampden Village Inc.	148
William D. Hughes, 422 Home Sales	149
George Allen, Community Owners (7 Part) Business Alliance	150
Charles L. Andersen, Harvest Homes	151
Deanna Fields, Manufactured Housing Association of Oklahoma	152
Ken Ward, Iseman Homes	153
Jason DiZenzo, DiZenzo Residential Communities, LLC	154
Jeff Scoular, Jimsco, Inc.	155
Kenneth F. Anderson, Manufactured Housing Industry of Arizona	156
Vickie Talley, Manufactured Housing Educational Trust (MHET)	157