

**INTERPRETATIVE BULLETIN A-1-78**  
**APPLICABLE OF REFERENCE STANDARDS AND**  
**SECOND GENERATION REFERENCE STANDARDS**  
**3280.4(a), 3280.304(b), 3280.604(a), 3280.703, et al**

Standards that are referenced in the various sections of the Federal mobile home construction and safety standards at 24 CFR Part 3280 apply to mobile homes according to the language of the Federal mobile home construction and safety standards and the language of the referenced standard. Where, for example, the Federal mobile home standards require that materials, methods of construction, fixtures, systems, devices or practices comply with or conform to cited reference standards, those reference standards are mandatory to the extent that they apply to materials, methods of construction, fixtures, systems, devices or practices in question. Further, where “second generation reference standards” are included in standards referenced in 24 CFR Part 3280, those standards are also mandatory to the extent that they are applicable according to the terms of the reference standards, the second generation reference standards, and any other standards referenced therein.

All Design Approval Inspection Agencies (DAPIAs) and Production Inspection Primary Inspection Agencies (IPIAs) shall insure that mobile home manufacturers under their surveillance follow this interpretation. Where questions arise concerning the applicability of portion of reference standards or second generation reference standards, the Department will respond on a case-by-case basis based on the reasonableness of the interpretation in light of the purpose of the Act and the regulations and the urgency of the question raised. Typically, a manufacturer, DAPIA, IPIA would request a determination relative to the applicability of a reference standard or second generation reference standard, providing the opposing positions and the basis for those positions. The Department would then review that material and supplement it as necessary to reach a decision. That decision would then be communicated to the parties raising the question. Where the interpretation appeared to be a general interest, the Department would also publish it as a bulletin under 24 CFR 3280.1(c) and 3282.113.