The purpose of this Interpretative Bulletin is to issue a Waiver of the thickness requirements for metal air supply ducts set out in the table “Minimum Metal Thickness for Ducts” in 24 CFR 3280.715(a) of the Federal Manufactured Home Construction and Safety Standards. The Department is issuing this Waiver based upon information and comparative test data which demonstrated that a metal air supply duct fabricated from .010" thick galvanized sheet metal provided a performance level equivalent to that required for a metal duct which conformed to the thickness requirement of 24 CFR 3280.715(a) of the Standards.

**WAIVER**

The Secretary hereby waives the thickness requirements of Section 3280.715(a) for air supply ducts subject to the following:

1. The duct being fabricated according to the shape, crimping and dimpling patterns specified on the duct design submitted, a copy which is attached to this Waiver.
2. The duct size is limited to nominal 4" height and 15" width that is indicated on the design.
3. The duct is fabricated from .010 inch thick steel sheet certified as complying with the ASTM steel specification A527.
4. The steel sheet shall be galvanized with a zinc coating level of G-60 or greater.
5. The air duct shall be listed as complying with the applicable requirements of Underwriters Laboratories, Inc.’s Standard UL 181-1972 for Factory Made Air Duct Materials except for the collapse test, Section 17.
6. The listing shall specify that the air duct is limited for use as air supply ducts only.

Additional shapes are permitted under this Waiver provided it is determined that:

1. The shapes have identical physical properties, thickness, crimping and dimpling patterns as the Iron Air Duct System.
2. Comparative test date demonstrates those configurations conform to the following tests in the UL 181-1972 Standard:
   - (a) Puncture Test Paragraph 12.1 thru 12.6
   - (b) Static Load Test Paragraph 13.1 thru 13.8
   - (c) Impact Test Paragraph 14.1 thru 14.7
   - (d) Pressure Test Paragraph 16.1 thru 16.5
   - (e) Leakage Test Paragraph 21.1 thru 21.5
3. All of the above conditions from this Waiver of the 4"x15"x0.10 system are met.