MHCC
Proposed Changes

Received as of January 11, 2016

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LogID	Section	Action	Current Status
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137	3286.207 (d) Process for obtaining installation license		Received by Secretariat
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Proposed Changes

Log # 78 - § 3280.304 Materials	Date: 11/26/2014
Submitter:	Michael Wade, Cavalier Homes
Requested Action:	New Text
Proposed Change:	**Current Log #78 (re-submission)** **Proposed add text in red.** **3280.304 Materials.** (a) Dimension and board lumber shall not exceed 19 percent moisture content at time of installation. (1) Treated lumber used for porch decking and porch joists which are fully exposed to ambient air may have a moisture content exceeding 19 percent.
Reason:	Per the current language, it is not permissible to use standard treated lumber. KDAT (kiln dried after treatment) must be used to obtain moisture content below 19%. Many porch designs exist where the joists do not extend into the enclosed portion of the floor cavity, and thus are exposed to ambient air at all times. Taking this into consideration, it seems logical that the moisture content of exposed treated lumber at the time of construction should not be limited.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Standard treated lumber typically sells for around $80.00 per thousand less that KDAT lumber, which equates to around $1.68 per board on a 2x8 that is 16' long. Example: On an End porch 8' deep that runs across both halves of a typical multi-section, would recognize a savings around/near $20.00 by being able to use standard treat vs KDAT.
Subcommittee Recommendation:	Approve as Modified (10-0-0)
MHCC Action:	Approve as Modified (21-0-0)
MHCC Modification of Proposed Change:	**3280.304 Materials.** (a) Dimension and board lumber shall not exceed 19 percent moisture content at time of installation, except that treated lumber used for exterior purposes may have a moisture content exceeding 19 percent.
MHCC Reason:	Clarification.
Current Status:	MHCC Final Action Submitted to HUD
Log History	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Approve as Modified. **7/15/2015** – SDSC Recommendation: Approve as Modified.

Log # 80 - § 3280.406 (new section)	Date:
Submitter:	James P. Van Schoyck, PFS Corporation
Requested Action:	Add text to Subpart E, Testing to read as follows:
Proposed Change:	Add text to Subpart E, Testing to read as follows: Sec. 3280.406 Air chamber test methods (Primary and Secondary) for certification and qualification of formaldehyde emission levels. (a) Preconditioning. Preconditioning of plywood or particleboard panels for air chamber tests shall be initiated as soon as practicable but not in excess of 30 days after the plywood or particleboard is produced or surface-finished, whichever is later, using randomly selected panels. (1) If preconditioning is to be initiated more than two days after the plywood or particleboard is produced or surface-finished, whichever is later, the panels must be dead-stacked or air-tight wrapped until preconditioning is initiated. (2) Panels selected for testing in the air chamber shall not be taken from the top or bottom of the stack. (b) Primary method testing. Primary method Testing shall be conducted in accordance with the Standard Test Method for Determining Formaldehyde Levels from Wood Products Under Defined Test Conditions Using a Large Chamber, ASTM E-1333-90, with the following exceptions: (1) The chamber shall be operated indoors. (2) Plywood and particleboard panels shall be individually tested in accordance with the following loading ratios: (i) Plywood--0.29 Ft2/Ft3, and (ii) Particleboard--0.13 Ft2/Ft3. (3) Temperature to be maintained inside the chamber shall be 77 (deg) plus or minus 2 (deg) F. (4) The test concentration (C) shall be standardized to a level (C_o) at a temperature (t_o) of 77 (deg)F and 50 percent relative humidity (H_o) by the following formula: $C = C_o x [1 + Ax (H - H_o)] \times e\text{-}R(1 / t - 1 / t_O)$ where: C = Test formaldehyde concentration C_o= Standardized formaldehyde concentration e = Natural log base R = Coefficient of temperature (9799) t = Actual test condition temperature (°K) t_o = Standardized temperature (° K) A = Coefficient of humidity (0.0175) H = Actual relative humidity (%) H_o = Standardized relative humidity (%) The standardized level (C_o) is the concentration used to determine compliance with Sec. 3280.308(a). (5) The air chamber shall be inspected and recalibrated at least annually to insure its proper operation under test conditions. (c) Secondary method testing. Secondary method testing is defined as specified in ASTM D6007-02, with the additional conditions specified below: (1) The secondary method shall be operated using the testing conditions and loading rates specified in ASTM D6007-02, and the conditioning time used to establish equivalence with the primary method. In addition, when testing panels, the secondary method shall be operated by testing nine specimens representing evenly distributed portions of an entire panel. The nine specimens shall be tested in groups of three specimens, resulting in three test results, which shall be averaged to represent one data point for the panel. (2) Equivalence between the secondary method and the primary method must be established, at least once each year, for each testing laboratory used for CFR 3280 compliance. Minimum requirements for an equivalence demonstration shall include at

	least ten comparison sample sets, which compare the results of the primary and secondary methods. The following parameters must be met in the comparison: (i) For the primary method, each comparison sample shall consist of the result of simultaneously testing an appropriate number of panels (factoring in the loading rate) from the same batch of panels tested by the secondary method. (ii) For the secondary method, each comparison sample shall consist of testing nine specimens representing evenly distributed portions of an entire panel. The nine specimens shall be tested in groups of three specimens (factoring in the loading rate), resulting in three test results, which shall be averaged to represent one data point for the panel, and matched to their respective primary method comparison sample result. (iii) The ten comparison sample sets shall consist of testing a minimum of five sample sets in each of at least two of the following ranges of formaldehyde concentrations, as measured by the primary method: a. Lower range: less than 0.07 ppm b. Intermediate range: 0.07 to less than 0.15 ppm c. Upper range: 0.15 to 0.30 ppm (3) The average and standard deviation of the difference of all comparison sets shall be calculated as follows. For each of the two ranges used for testing, the following computations shall be performed: (i) Denote the number of sets in the given range by *n*. (ii)Compute the difference for the *i* th set by *Di*, where *i* ranges from 1 to *n*. (iii) Compute the average, *X*, and standard deviation, *S*, of the differences according to the following formulas: *** Insert Equations here*** (4) The secondary method shall be considered equivalent to the primary method if the following condition is met for both tested ranges: [X] + 0.88 S ≤ C 0.026 for the lower range; 0.038 for the intermediate range; and 0.052 for the upper range. (5) Equivalence must be established between the primary and secondary method to represent the range in emissions based on the emission standards specified in section (c), (2), (iii). [49 FR 32012, Aug. 9, 1984, as amended at 58 FR 55009, Oct 25, 1993]
Reason:	Currently Section 3280.406 "Air chamber test method for certification and qualification of formaldehyde emission levels" required the Formaldehyde Emission Level test to be performed in accordance with ASTM E1333 "Test method for Determining Formaldehyde Levels from Wood Products Under Defined Test Conditions Using a Large Chamber." PFS Corporation is requesting an alternate test method to the standard ASTM E1333 test. There are two (2) most recent formaldehyde emissions limitation programs in the United States and they are: 1. California Air Resources Board (CARB) *"ATCM to Reduce Formaldehyde Emission From Composite Wood Products"* 2. Environmental Protection Agency (EPA) Public Law 11-199 *"Title VI – Formaldehyde Standards from Composite Wood Products."*

	Both CARB and EPA specify the use of ASTM E1333 but also allow the use of ASTM D6007 test method after equivalence has been proven between the two. Note - the equivalence is based on satisfactory compliance with minimum allowable variation between the ASTM E1333 test results and the ASTM D6007 test results which are determined on the same sample. PFS testing laboratory conducted the correlation protocol using our ASTM D6007 small chamber (Moblehyde) test apparatus. The Mobledehyde is a CARB approved secondary method. A copy of the PFS Corporation correlation test results showing compliance with requirement is Attachment A. Note: Supporting material is available for review at NFPA Headquarters.
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	The reasons for this request is that the ASTM D6007 is a more efficient test method because the sample size is smaller and the test is completed in less time. This difference reduces sample preparation time, shipping and handling costs, and the time to conduct the emission measurement which is a big savings to the HUD manufacture program. Because the small chamber testing takes approximately 14 fewer hours than large chamber and the amount of lab area required is smaller - the cost savings is significant. During a 24 hour period - the small chamber has allowed for PFS to generate $6,000.00 in testing fees using three small chambers vs. $600.00 using the large chamber method. We allow for the small chambers to run via computer controlled data acquisition for over-night testing. This eliminates need for staff over-time.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Tabled, pending EPA Action
Log History:	

Log # 87 - § 3280.112 Hallways		Date: 11/18/2014
Submitter:	Steve Anderson	
Requested Action:	Revised Text	
Proposed Change:	**§ 3280.112 Hallways.** Hallways shall have a minimum horizontal dimension of ~~28~~36 inches measured from the interior finished surface to the interior finished surface of the opposite wall. When appliances are installed in a laundry area, the measurement shall be from the front of the appliance to the opposite finished interior surface. When appliances are not installed and a laundry area is provided, the area shall have a minimum clear depth of ~~27~~35 inches in addition to the ~~28~~36inches required for passage. In addition, a notice of the available clearance for washer/dryer units shall be posted in the laundry area. Minor protrusions into the minimum hallway width by doorknobs, trim, smoke alarms or light fixtures are permitted.	
Reason:	The justification has nothing to do with cost. It has everything to do with fire safety. Basic physics teach us that the narrowed the hallway, the greater the velocity. This means that there is a greater chance of the chimney effect occurring in homes with narrower hallways than with wider hallways. Most building codes recognize these factors by enlarging hallway widths. Most local building codes require hallway widths to be from 36" to 48". Florida state code puts them at either 42" or 48" – depending on whether it is handicapped accessible or not. Los Angeles County Building Code is 36". Salt Lake City has adopted the 2012 version of the IBC, which places the width at 36 inches.	
Substantiating Documents:	No	
Additional Cost:	Unknown	
Cost Benefit Explanation:	This proposal does not pretend to be of any financial benefit – with regards to cost savings in the construction of the homes. Instead, the benefit comes from making the homes safer and the potential loss of life lessened. The question regarding cost savings comes from the problem of defining the worth of human life. To me, the cost is high – others have a different point of view.	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	Pending Recommendation from Structure and Design Subcommittee	
Log History:	**8/18/2015** – MHCC Motion: Refer to Structure and Design Subcommittee. **12/2/2014** – Table until next MHCC meeting awaiting additional supporting documents.	

Log # 88 - § 3280.715 Circulating Air Systems	Date: 10/08/2014
Submitter:	Task Force: Manuel Santana (chair), Debra Blake, & Tim O'Leary
Requested Action:	Revise as follows:
Proposed Change:	**§ 3280.715 Circulating air systems.** (a)(1) Supply air ducts, fittings, and any dampers contained therein must be made of galvanized steel, tin-plated steel, or aluminum, or must be listed as Class 0 or Class 1 air ducts and air connectors in accordance with UL 181– 2003, Factory-Made Air Ducts and Air Connectors (incorporated by reference, see § 3280.4). ~~Class 1 air~~ Air ducts and air connectors ~~must be~~ located ~~at least~~ within 3 feet ~~from~~ of the furnace discharge ~~bonnet or plenum~~ must be rated to withstand the maximum discharge air temperature of the equipment. Air connectors must not be used for exterior manufactured home duct connection. A duct system integral with the structure must be of durable construction that can be demonstrated to be equally resistant to fire and deterioration as required by this section. ~~Furnace supply plenums must be constructed of metal that extends a minimum of 3 feet from the heat exchanger measured along the centerline of airflow.~~ Ducts constructed from sheet metal must be in accordance with the following table:
Reason:	Adding the requirement that the duct be rated to at least the maximum air discharge temperature of the equipment satisfies the fire safety concern and covers all installation cases without needing to specify type of equipment or type of duct.
Substantiating Documents:	no
Additional Cost:	No
Cost Benefit Explanation:	There will be no additional cost associated with this proposal.
Subcommittee Recommendation:	Approve (10-0-0)
MHCC Action:	Approve (19-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/5/2014** – Additional Cost and Cost Benefit Explanation received from Manuel Santana. **12/4/2014** o MHCC Motion: Approve. o TSSC Recommendation: Approve. **10/8/2014** – Log 88 was submitted by a Task Force consisting of Manuel Santana (chair), Debra Blake, and Tim O'Leary. The TF was responsible for turning Action Item 1 – Supply Air Ducts Letter into a proposed change. Log 88 is the resulting proposed change. The proposed change is missing Cost/Benefit Information.

Log # 89 - § 3282.8 Applicability		Date: 11/19/2014
Submitter:	Mark Weiss	
Requested Action:	Revised Text	
Proposed Change:	***Revise 24 CFR 3280.2 Definitions as follows:*** Dwelling ~~unit~~ means ~~one or more habitable rooms which are designed to be occupied by one family with facilities for living, sleeping, cooking and eating~~ a structure designed and constructed for use as a permanent residence by one or more persons, with facilities for sleeping, eating, cooking, and sanitation, which constitutes an independent living unit. The term "dwelling" (as defined in 24 C.F.R. 3282.8(g) does not include recreational vehicles or other transportable structures designed, constructed, and utilized exclusively for temporary, non-residential occupancy. Manufactured home means a structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or40 body feet or more in length or which when erected on-site is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to§ 3282.13 of this chapter and complies with the construction and safety standards set forth in this part 3280. ~~The term does not include any self-propelled recreational vehicle~~. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected on site. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12U.S.C. 1709(b). ***Revise 24 C.F.R. 3282.8 Applicability as follows:*** **3282.8** (g) Recreational vehicles. ~~Recreational vehicles are not subject to this part, part3280, or part 3283. A recreational vehicle is a vehicle which is:~~ ~~(1) Built on a single chassis;~~ ~~(2) 400 Square feet or less when measured at the largest horizontal projections;~~ ~~(3) Self-propelled or permanently towable by a light duty truck; and~~ ~~(4) Designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel, or seasonal use.~~ A recreational vehicle is a self-propelled or towable vehicle, or other transportable structure, not affixed to land either permanently or temporarily, that is neither designed, constructed nor utilized as a dwelling.	

Reason:	At the urging of the recreational vehicle (RV) industry, legislation has been introduced in Congress (i.e. H.R. 5658) that would exempt certain RVs from the definition of "manufactured home" contained in the National Manufactured Housing Construction and Safety Standards Act of 1974 (as amended) (42 U.S.C. 5402(6)) ("Act"). Currently, the Act expressly exempts only "self-propelled recreational vehicle[s]" from the statutory definition of "manufactured home" and potential regulation by HUD pursuant to the Act. H.R. 5658 would create and extremely broad statutory exemption for "towed" RVs, with no size or single-chassis limitation, and for an undefined class of "Park Model" RVs with a "gross area of not greater than 400 square feet…" Given the fact that the Act, by its express terms, is a "housing" law and, in its original form, included no reference to RVs, expanded statutory RV exemption language would only exacerbate the problems caused by the later inclusion of "self-propelled" RVs. Such a broad statutory exemption, moreover, which could effectively create a class of unregulated de facto homes and thereby expose consumers to significant safety risks and home value issues, among other negative impacts, is unnecessary to address any potentially valid concerns raised by RV interests. It would also invite potentially unlimited requests for similar statutory exclusions for other types of existing structures and/or structures that could evolve with new technology in the future. Instead, since the Act defines regulated "manufactured homes" as designed for use as a "dwelling," and there is no dispute that RVs are not designed for use as a "dwelling," the sections cited above should be modified to exclude non-dwelling RVs from HUD regulation pursuant to the Act. Such regulation, based on the design, construction and use of RVs versus manufactured homes, would eliminate continuing disputes over the current definitions and exclusions based on size parameters and dimensions, as well as administrative interpretations regarding the proper measurement of those parameters, and create a firewall between manufactured homes designed and constructed as permanent residences and RVs.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	MHARR does not anticipate any impact on the cost of manufactured housing to the public as defined by the Act (42 U.S.C. 5403(e)) as a result of adoption of the proposed amendments.
Subcommittee Recommendation:	
MHCC Action:	Approved as Modified (19-0-0)
MHCC Modification of Proposed Change:	*Revise Standard as follows:* ***3282.8 Applicability*** (g) *Recreational vehicles.* Recreational vehicles are not subject to this part, part 3280. A recreational vehicle is a ~~vehicle which is:~~ factory built vehicular structure designed only for recreational use and not as a primary residence or for permanent occupancy, built and certified in accordance with NFPA 1192-2015 or ANSI A119.5-09 consensus standards for recreational vehicles and not certified as a manufactured home. ~~(1) Built on a single chassis;~~ ~~(2) 400 Square feet or less when measured at the largest horizontal projections;~~ ~~(3) Self-propelled or permanently towable by a light duty truck; and~~ ~~(4) Designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel, or seasonal use.~~
MHCC Reason:	The HUD Office of Manufactured Housing regulates manufactured housing. Manufactured housing designed and built to HUD standards under the HUD Office of Manufactured Housing program are permanent residences. RVs designed and built for temporary recreational or seasonal camping accommodation in accordance with widely used/accepted national standards and are not manufactured homes.

	RVs, in their many shapes and sizes, are not manufactured homes and are outside of the manufactured home standards and regulations. The current HUD regulation that excludes recreational vehicles from the HUD manufactured housing standards and regulations adds language that defines an RV. In practice, this has the effect of acting as de facto federal HUD regulation of RVs. There is no need for a complicated definition of recreational vehicles in the HUD regulations that acts as de facto HUD standards for RVs and potentially creates an obligation for the HUD Office of Manufactured Housing to attempt to enforce manufactured housing standards on RVs. The model for this proposal is 24 CFR 3282.8(L): "(l) Multifamily homes. Mobile homes designed and manufactured with more than one separate living unit are not covered by the standards and these regulations." This simple exclusionary language creates a clear, simple and bright line between manufactured housing and multifamily housing. The same clear, simple and bright line also makes sense for excluding RVs from HUD's manufactured housing program.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** – MHCC Motion: Approve as Modified.

Log # 90 - § 3285.2 Manufacturer installation instructions	Date: 11/21/2014
Submitter:	Manuel Santana, Cavco Industries
Requested Action:	Revised Text
Proposed Change:	**3285.2(c)(1)(ii)** If designs and instructions are not available from the manufacturer, obtain an alternate design prepared and certified by a registered professional engineer or registered architect for the support and anchorage of the manufactured home that is consistent with the manufactured home design ~~,~~ and conforms to the requirements of the MHCSS~~,~~ ~~and has been approved by the manufacturer and the DAPIA.~~
Reason:	This section recognizes that it is impossible for a manufacturer's installation manual to address all site specific circumstances. This section provides owners and installers with the option to obtain an installation method better suited (be it due to cost or site conditions) to their situation. Requiring that the proprietary, site specific installation or foundation system that the customer paid to obtain be submitted to both the manufacturer and DAPIA completely eliminates the benefit of allowing consumers to obtain their own design. This requirement only serves to increase both the cost and completion time of the project.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	This proposal constitutes a savings to the customer both in time and money, total savings will vary.
Subcommittee Recommendation:	
MHCC Action:	Disapprove (17-4-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	Approval by the DAPIA and manufacturer are too important to remove from this section.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Disapprove. **2/10/2015** – Final Action from December 2-4, 2014 meeting overturned by MHCC Ballot II. **12/2/2014** – MHCC Motion: Approve as Modified. " *Revise Standard as follows:* **3285.2(c)(1)(ii)** If designs and instructions are not available from the manufacturer, obtain an alternate design prepared and certified by a registered professional engineer or registered architect for the support and anchorage of the manufactured home that is consistent with the manufactured home design~~,~~ and conforms to the requirements of the MHCSS~~,~~ and has been approved by ~~the manufacturer and~~ the DAPIA."

Log # 91 - § 3280.603 General requirements		Date: 11/21/2014
Submitter:	Manuel Santana, Cavco Industries	
Requested Action:	Revised Text	
Proposed Change:	**3280.603(b)(4)(ii)** A statement in the installation instructions required by §3280.306(b), stating that if the heat tape of pipe heating cable is used, it must be listed ~~for use with manufactured homes.~~ or certified for its intended purpose.	
Reason:	Heat tape used on a manufactured home is not different than heat tape used on a conventionally built home. This would relieve the added cost to the customer of additional listing expense incurred by the manufacturer.	
Substantiating Documents:	No	
Additional Cost:	No	
Cost Benefit Explanation:	There is no additional costs with this proposal. there are potential cost savings by having more options available to the consumer.	
Subcommittee Recommendation:		
MHCC Action:	Approve (19-0-0)	
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	MHCC Final Action Submitted to HUD	
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** – MHCC Motion: Approve.	

Log # 92 - § 3280.709 Installation of appliances		Date: 11/21/2014
Submitter:	Manuel Santana, Cavco Industries	
Requested Action:	Revised Text	
Proposed Change:	**3280.709(a)** The installation of each appliance shall conform to the terms of its listing and the manufacturer's instructions. ~~The installer shall leave the manufacturer's instructions attached to the appliance.~~ Every appliance shall be secured in place to avoid displacement. For the purpose of servicing and replacement, each appliance shall be both accessible and removable.	
Reason:	§3280.711 requires that installation instructions be shipped with the homeowners manual. This caused confusion as to whether it was necessary to ship two installation instructions with each appliance, one with the appliance and one with the homeowners manual. This revision will make it clear that it is not necessary to ship a duplicate set of installation instructions with each house.	
Substantiating Documents:	No	
Additional Cost:	No	
Cost Benefit Explanation:	There is a cost benefit of not having to procure and ship duplicate sets of installation manuals.	
Subcommittee Recommendation:		
MHCC Action:	Approve (19-0-0)	
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	MHCC Final Action Submitted to HUD	
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** – MHCC Motion: Approve.	

Log # 93 - § 3280.709 Installation of appliances & § 3285.503 Optional appliances	Date: 11/21/2014
Submitter:	Manuel Santana, Cavco Industries
Requested Action:	Revised Text
Proposed Change:	**3280.709(g)** Solid fuel-burning factory-built fireplaces and fireplace stoves listed for ~~use in manufactured homes~~ residential use may be installed in manufactured homes provided they and their installation conform to the following paragraphs. A fireplace or fireplace stove shall not be considered as a heating facility for determining compliance with subpart F. **3285.503 (b) *Fireplaces and wood stoves*.** When not provided by the home manufacturer, fireplaces and wood-stoves must be listed ~~for use with manufactured homes~~ or certified for their intended purpose and must be installed in accordance with their listings.
Reason:	Residential fireplaces when listed by a nationally recognized agency are constructed in the same manner as one that has been listed for use in a manufactured home. This would relieve the added cost to the customer of additional listing expense incurred by the manufacturer.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	There is no additional cost associated with this proposal
Subcommittee Recommendation:	
MHCC Action:	Log 93-A: Approve (19-0-0) Log 93-B: Approve as Modified (18-1-0)
MHCC Modification of Proposed Change:	**Log 93-A** **3280.709(g)** Solid fuel-burning factory-built fireplaces and fireplace stoves listed for ~~use in manufactured homes~~ residential use may be installed in manufactured homes provided they and their installation conform to the following paragraphs. A fireplace or fireplace stove shall not be considered as a heating facility for determining compliance with subpart F. **Log 93-B** *Revise proposed change as follows (in red):* **3285.503 (b) *Fireplaces and wood stoves*.** When not provided by the home manufacturer, fireplaces and wood-stoves must be listed for residential use ~~with manufactured homes or certified for their intended purpose~~ and must be installed in accordance with their listings.
MHCC Reason:	Log 93-B: Clarification for residential use only, "certified for their intended purpose" language was deemed unnecessary. If the fireplace or wood stoves were intended for residential use and are installed in accordance with their listings there should be no reason why you shouldn't be able to use them in a manufactured home.
Current Status:	Log 93-A: MHCC Final Action Submitted to HUD Log 93-B: MHCC Final Action Submitted to HUD
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** ○ MHCC Motion: Approve as Modified Log 93-B**.** ○ MHCC Motion: Approve Log 93-A. ○ MHCC Motion: Divide proposed change based on section.

Log # 94 - § 3280.707 Heat producing appliances	Date: 11/21/2014
Submitter:	Manuel Santana, Cavco Industries
Requested Action:	Revised Text
Proposed Change:	**3280.707(a)** Heat-producing appliances and vents, roof jacks and chimneys necessary for their installation in manufactured homes shall be listed or certified by a nationally recognized testing agency ~~for use in manufactured homes.~~
Reason:	Safety features and efficiency ratings can be met by using a residential appliance listed by a nationally recognized listing agency and not cause additional expense to the manufacturer and customer by forcing appliance manufacturers to state their product is listed for use in a manufactured home.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	There is no additional cost associated with this proposal. It will benefit consumers by making available a wider ranges appliances for installation in manufactured homes.
Subcommittee Recommendation:	
MHCC Action:	Approve as Modified (19-0-0)
MHCC Modification of Proposed Change:	*Revise proposed change as follows (in red):* **3280.707(a)** Heat-producing appliances and vents, roof jacks and chimneys necessary for their installation in manufactured homes shall be listed or certified for residential use by a nationally recognized testing agency. ~~for use in manufactured homes.~~
MHCC Reason:	Clarification.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** – MHCC Motion: Approve as Modified.

Log # 95 - § 3280.102 Definitions & § 3280.103 Light and ventilation	Date: 11/21/2014
Submitter:	Michael Lubliner, Northwest Energy Efficiency Alliance
Requested Action:	Revised Text
Proposed Change:	**PROPOSED VENTILATION CHANGES TO CURRENT HUD MANUFACTURED HOUSING CONSTRUCTION & SAFETY STANDARDS (MHCSS):** **Insert the following definitions from 62.2-2013 into 3280.103:** ***air, exhaust:*** air discharged from any space to the outside by an exhaust system. ***air, outdoor:*** air from outside the building taken into a ventilation system or air from outside the building that enters a space through infiltration or natural ventilation openings. ***exhaust system:*** one or more fans that remove air from the building, causing outdoor air to enter by ventilation inlets or normal leakage paths through the building envelope. ***mechanical ventilation:*** the active process of supplying air to or removing air from an indoor space by powered equipment such as motor-driven fans and blowers but not by devices such as wind-driven turbine ventilators and mechanically operated windows ***natural ventilation:*** ventilation occurring as a result of only natural forces, such as wind pressure or differences in air density, through intentional openings such as open windows and doors. ***supply system:*** one or more fans that supply outdoor air to the building, causing indoor air to leave by normal leakage paths through the building envelope. ***ventilation:*** the process of supplying outdoor air to or removing indoor air from a dwelling by natural or mechanical means. Such air may or may not have been conditioned. **Insert and delter the following in § 3280.103 Light and ventilation.** (b) *Whole-house ventilation.* Each manufactured home must be provided with whole-house mechanical ventilation having a minimum capacity of 0.035 ft3/min/ft2 of interior floor space or its hourly average equivalent. This ventilation capacity must be in addition to any openable window area. . The following criteria must be adhered to: (1) The ventilation capacity must be provided by a mechanical ventilation system or a combination passive and mechanical ventilation system. (3) The ventilation supply system or a portion of the system is permitted to be integral with the home's heating or cooling system. The supply system must be capable of operating independently of the heating or cooling modes. A mechanical ventilation supply system that is integral with the heating or cooling system is to be listed as part of the heating and cooling system or listed as suitable for use with that system. (c) *Additional ventilation.* (2)Kitchens shall be provided with a local exhaust fan that is capable of exhausting 100 cfm to the outside of the home. The local exhaust fan shall be located as close as possible to the range or cook top, but in no case farther than 3 feet horizontally from the range or cook top. (3)Each bathroom and separate toilet compartment shall be provided with local exhaust fans capable of exhausting 50 cfm to the outside of the home. A separate toilet compartment may be provided with 1.5 square feet of openable glazed area in place of mechanical ventilation, except in Uo value Zone 3. (f) **Ventilation Supply and Exhaust System(s) Airflow Measurement.** The airflow required is the quantity of indoor air supplied and/or exhausted by the ventilation system as installed and shall be measured using a flow hood, flow grid, or other

commercially available airflow measuring device in accordance with the manufactured instructions. The frequency of testing shall be specified in manufacturer's quality assurance plan (QA). Measurements and shall occur whenever any ventilation system components is changed that may impact airflow(e.g. fan size, duct diameter, termination fitting type)

Exception: The airflow rating, at a pressure of 0.25 in. w.c. (62.5 Pa) may be used, provided the duct sizing meets the prescriptive requirements of Table XX or manufacturer's design criteria.

TABLE XX – Prescriptive Duct Sizing
(note: bolded values are the range for mfg. home ventilation systems)

Duct Type	**Flex Duct**								**Smooth Duct**							
Fan Airflow Rating																
CFM @0.25 in. w.c. (L/s @ 62.5 Pa)	**50 (25)**	**80 (40)**	**100 (50)**	125 (65)	150 (75)	200 (100)	250 (125)	300 (150)	**50 (25)**	**80 (40)**	**100 (50)**	125 (65)	150 (75)	200 (100)	250 (125)	300 (150)
Diameter[1] in. (mm)	Maximum Length[2,3,4] ft. (m)															
3 (75)	X	X	X	X	X	X	X	X	5(2)	X	X	X	X	X	X	X
4 (100)	**56 (17)**	**4 (1)**	**X**	**X**	**X**	X	X	X	**114 (35)**	**31 (9)**	**10 (3)**	X	X	X	X	X
5 (125)	**NL**	**81 (25)**	**42 (9)**	**16 (5)**	**2 (0.6)**	X	X	X	**NL**	**152 (46)**	**91 (28)**	51 (16)	28 (9)	4 (1)	X	X
6 (150)	**NL**	**NL**	**158 (48)**	**91 (28)**	**55 (17)**	18 (5)	1 (0.3)	X	**NL**	**NL**	**NL**	168 (51)	112 (34)	53 (16)	25 (8)	9 (3)
7 (175)	NL	NL	NL	NL	161 (49)	78 (24)	40 (12)	19 (6)	NL	NL	NL	NL	NL	148 (45)	88 (27)	54 (16)
8 (200) and above	NL	NL	NL	NL	NL	189 (58)	111 (34)	69 (21)	NL	NL	NL	NL	NL	NL	198 (60)	133 (41)

1. For non-circular ducts, calculate the diameter as four times the cross-sectional area divided by the perimeter.
2. This table assumes no elbows. Deduct 15 feet (5 m) of allowable duct length for each elbow.
3. NL = no limit on duct length of this size.
4. X = not allowed, any length of duct of this size with assumed turns and fitting will exceed the rated pressure drop.

Reason:	PROBLEM: This proposal attempts to address the GAO report recommendations to HUD related to INDOOR AIR QUAILTY. The proposer believes GOA raises urgent health and safety issue that must be PROMPTLY addressed to protect consumers and reduce liability issues to industry and HUD. PROPOSAL RECOMENDATIONS: 1) Utilize recognized engineering standards by better aligning 3280-103 with ANSI/ASHRAE standard 62.2-2013. The proposer believes that alignment is consistent with the objectives National Technology Transfer Act, which direct federal agencies to use established industry ANSI type standards. 2) The proposer looks forwarded to discussing this proposal as chair of the systems sub-committee task group addressing the GAO recommendations at the December 2014 MHCC meeting. 3) Improve engineering design equipment selection. This proposal advises on using 0.25 inch water static pressure drop (not 0.1 as currently assumed) and exhaust duct sizing tables in ASHRAE 62.2 at the design stage in selecting the ventilation system components. 4) Performance testing to ensure compliance with design values. The proposal includes a testing requirement for ALL ventilation system fans, using commercially available flow measuring equipment in accordance with the equipment manufacturer instructions for operation and calibration. The equipment manual instructions will allow for accurate measurements to be performed by manufacturer, DAPIA's, IPIA's, HUD staff and IBTS. it was suggested that the manufacturer QA plan should guide the frequency of ventilation system flow rate testing at the discretion of the manufacturer with DAPIA, IPIA and HUD/IBTS oversight. Noted examples of this commercially available equipment from; THE ENERGY CONSERVATORY: http://products.energyconservatory.com/flowblaster-capture-hood-attachment/ and http://products.energyconservatory.com/exhaust-fan-flow-meter/ ALNOR: http://www.tsi.com/Alnor-Balometer-Capture-Hood-EBT721/ The following are the proposers observations/notes from the MHCC Task Group Conference call on 11/17/2004: 1) Is there a low flow issue in the field? Lubliner offered to HUD and industry stakeholders technical field/in plant assistance to measure the performance of ventilation systems to ensure compliance with 3280.013 minimum flow rate requirements of; 0.035 cfm/ft2 for whole house, 100 cfm for kitchen and 50 cfm bath exhaust fans. Lubliner referenced his person experiences testing as well as an ASHRAE peer review research paper on HUD-code mfg. home ventilation, and the NIST research report for HUD Healthy Homes program. Both reports are peer reviewed engineering publications that document low flow measurements of bath, kitchen and whole house ventilation systems and both referenced in GAO report. 2) What is the scope of GAO report with respect to testing? Lubliner noted he believes the GAO report did not limit performance testing to just whole house ventilation, and suggests bath and kitchen fans performance testing be included, since the consumer care about all exhaust fans meeting the minimum flow rates required in MHCSS 3280.103. 3) What standards and protocols needed to guide flow rate measurements? There are no specific engineering standards that can be referenced to guide the testing. Francisco noted that that ASHRAE 62.2 does not include flow rate protocol requirements. Lubliner suggested that using the equipment manufacturer instructions should be adequate to help ensure the required accuracy and repeatability, as is the case when 62.2 is employed in site built and modular homes. 4) Proposer action items for HUD/MHCC should focus on; * The design and equipment selection using 0.25 pressure drop assumptions (as this proposal addresses), and duct sizing table. * Testing flow rates of ventilation systems using commercially available equipment in accordance the equipment manufacturer instructions. (as t * HUD provides an interpretation that would allow for one exhaust fan located in a bathroom be used for both whole house and bath exhaust ventilation to reduce cost to consumer and improve ventilation system performance.
Substantiating Documents:	
Additional Cost:	No
Cost Benefit Explanation:	There is no cost increase in this proposal, IF HUD allows, (as 62.2 does), the use of one $100 low sone (quiet) exhaust fan in a bathroom to satisfy both the 50 CFM bath fan AND 0.035 CFM.ft2 whole house requirements in MHCSS-3280-103. Any increased cost would be offset by not having to install a furnace supply system (e.g. POS or Blendaire)

	or installing cheap "whole house fan" in the hallway and by eliminating labor and materials associated with; ducting, wiring, ceiling drywall and roof decking/flashing. The cost of testing is insignificant, since the proposal allows the frequency to be determined by the mfg. QA plan. The testing equipment runs $100-$1000 and can be amortized over time so as not tom impact the cost of the individual home. These issues were discussed on the MHCC systems sub-committee tasks groups conference call 11/17/2014.
Subcommittee Recommendation:	Approve as Modified (8-0-0)
MHCC Action:	Approve as Modified (17-1-1)
MHCC Modification of Proposed Change:	*Revise Standard as follows:* **PROPOSED VENTILATION CHANGES TO CURRENT HUD MANUFACTURED HOUSING CONSTRUCTION & SAFETY STANDARDS (MHCSS):** **Insert the following definitions from 62.2-2013 into 3280.102:** ***air, exhaust:*** air discharged from any space to the outside by an exhaust system. ***air, outdoor:*** air from outside the building taken into a ventilation system or air from outside the building that enters a space through infiltration or natural ventilation openings. ***exhaust system:*** one or more fans that remove air from the building, causing outdoor air to enter by ventilation inlets or normal leakage paths through the building envelope. ***mechanical ventilation:*** the active process of supplying air to or removing air from an indoor space by powered equipment such as motor-driven fans and blowers but not by devices such as wind-driven turbine ventilators and mechanically operated windows ***natural ventilation:*** ventilation occurring as a result of only natural forces, such as wind pressure or differences in air density, through intentional openings such as open windows and doors. ***supply system:*** one or more fans that supply outdoor air to the building, causing indoor air to leave by normal leakage paths through the building envelope. ***ventilation:*** the process of supplying outdoor air to or removing indoor air from a dwelling by natural or mechanical means. Such air may or may not have been conditioned. **Insert the following in § 3280.103 Light and ventilation.** (b) *Whole-house ventilation.* Each manufactured home must be provided with whole-house mechanical ventilation having the capability to provide a minimum capacity of 0.035 ft3/min/ft2 of interior floor space or its hourly average equivalent. This ventilation capacity must be in addition to any openable window area. The following criteria must be adhered to: (1) The ventilation capacity must be provided by a mechanical ventilation system or a combination passive and mechanical ventilation system. (3) The ventilation supply system or a portion of the system is permitted to be integral with the home's heating or cooling system. The supply system must be capable of operating independently of the heating or cooling modes. A mechanical ventilation supply system that is integral with the heating or cooling system is to be listed as part of the heating and cooling system or listed as suitable for use with that system. (c) *Additional ventilation.* (2)Kitchens shall be provided with a local exhaust system that is capable of exhausting 100 cfm to the outside of the home. The local exhaust system shall be located as close as

	possible to the range or cook top, but in no case farther than ~~10~~ 3 feet horizontally from the range or cook top. (3)Each bathroom and separate toilet compartment shall be provided with local exhaust system capable of exhausting 50 cfm to the outside of the home. A separate toilet compartment may be provided with 1.5 square feet of openable glazed area in place of mechanical ventilation, except in Uo value Zone 3. ~~(d) **Ventilation Supply and Exhaust System(s) Airflow Measurement.** The airflow required is the quantity of indoor air supplied and/or exhausted by the ventilation system as installed and shall be measured using a flow hood, flow grid, or other commercially available airflow measuring device in accordance with the manufactured instructions. The frequency of testing shall be specified in manufacturer's quality assurance plan (QA). Measurements and shall occur whenever any ventilation system components is changed that may impact airflow(e.g. fan size, duct diameter, termination fitting type)~~ During the design stage, the airflow rating at a pressure of 0.25 in. w.c. (62.5 Pa) may be used, provided the duct sizing meets the prescriptive requirements of ANSI/ASHRAE Standard 62.2-2013 *Ventilation and Acceptable Indoor Air Quality in low-rise Residential Buildings* Table 5.3 or ventilation system manufacturer's design criteria.
MHCC Reason:	The committee had concerns on the testing portion of the proposed change. It was removed to allow the other parts of the proposed change to move forward.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/4/2014** o MHCC Motion: Approve as Modified. o TSSC Recommendation: Approve as Modified. o Resolution of AI-2 GAO letter was presented as a modification to Log 95.

Log # 96 - § 3280.2 Definitions	Date: 11/21/2014
Submitter:	Mark Wilson, Community Frameworks
Requested Action:	New Text
Proposed Change:	Development of Manufactured Home Construction and Safety Standards for structures transportable in one section, which in the traveling mode is 8 body feet or more in width or 40 body feet or less in length or which when erected on-site is between 150 and 320 square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air-conditioning, and electrical systems contained in the structure. The dwelling may or may not contain a kitchen, per se, and may or may not contain bathing fixtures, but at a minimum would contain a water closet and sink.
Reason:	Community Frameworks is a 501(C)3 non-profit organization that has been developing affordable housing in the Pacific Northwest for over forty years. We are also a licensed manufactured home dealer in the states of OR and WA. We recently completed a development of (30) Tiny Homes for a non-profit in Olympia, WA that provided permanent residence for otherwise homeless individuals. The development resulted in national media coverage and has resulted in a great deal of interest by non-profits and cities throughout the nation. The Tiny Homes for that project were site built as a result of a dearth of factory built options. We would like to develop a factory built solution that can be replicated but due to the size of the structures and their intended usage, we are relegated to having them built to IRC standards. By establishing standards under CFR 3280, it would create a Federal Preemption, establish a universal design, facilitate the ease of placement and undoubtedly result in a more affordable solution. In addition to providing a permanent residence to homeless populations, we believe there are other vulnerable individuals and groups that could benefit from the development of this standard. Information specific to the above referenced development may be found at: http://www.nytimes.com/2014/02/20/garden/small-world-big-idea.html?_r=0 (or) at http://quixotevillage.com/
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Relative to Administrative Costs: I do not know the cost implications to the Office of Manufactured Housing Programs. Relative to product Costs: It has been my experience that it is much more cost effective to have a dwelling built to Part 3280 Manufactured Housing Construction and Safety Standards than to the International Residential Code.
Subcommittee Recommendation:	
MHCC Action:	Disapprove (19-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	The MHCC does not have the authority under the Act to create a standard for a home under 320 sq ft. Other means are available for a tiny home producer to seek approval from HUD.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** – MHCC Motion: Disapprove.

Log # 97 - § 3280.707 Heat producing appliances		Date: 11/21/2014
Submitter:	Michael Lubliner, Northwest Energy Efficiency Alliance	
Requested Action:	New Text	
Proposed Change:	Insert "fuel burning" after "heat producing" in 3280-707	
Reason:	The requirement for listing was intended only for heat producing, "fuel burning" appliances such as natural gas, propane, oil and solid fuel furnaces &/or Domestic Hot Water heater (DHW). This proposal will save consumers money and provide greater choices to utilize non-burning energy efficient technologies such as; heat pump water heaters and ductless and centrally ducted Variable Refrigerant flow (VRF) heat pumps. Consumers who desire these systems are often told that HUD requirements do not allow these technologies to be used without a special listing for HUD-homes built to MHCC. This often results in installation aftermarket which is more expensive than having the plant install	
Substantiating Documents:	No	
Additional Cost:	No	
Cost Benefit Explanation:	Consumers who desire these electric space and water heating systems are often told that HUD requirements do not allow these technologies to be used without a special listing for HUD-homes built to MHCC. Often they end up doing the installation aftermarket which is more expensive than having the plant install, and may result in non-compliance with MHCSS. The proposal however will reduce revenues to listing agencies who conduct the "special" HUD listing.	
Subcommittee Recommendation:		
MHCC Action:	Disapprove (18-1-0)	
MHCC Modification of Proposed Change:		
MHCC Reason:	In favor of action on Log 94.	
Current Status:	MHCC Final Action Submitted to HUD	
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** – MHCC Motion: Disapprove.	

Log # 98 - § 3280.307 Resistance to elements and use	Date: 11/21/2014
Submitter:	Michael Lubliner, Northwest Energy Efficiency Alliance
Requested Action:	New Text
Proposed Change:	**Add section 6.2 definitions:** Water Resistive Barrier – A material behind the exterior wall covering that is intended to prevent liquid water that has penetrated behind the exterior covering from intruding further into the exterior wall assembly. **Add a new section "e":** **§3280.307 Resistance to elements and use.** (e) The exterior wall envelope shall be designed and constructed in a manner that prevents the accumulation of water within the wall assembly by providing a Water Resistive Barrier (WRB) behind the exterior cladding and a means of draining water that enters the assembly.
Reason:	This proposal seeks to improve the durability, longevity, and quality of our national "federally preempted" housing stock built to HUD MHCSS. WRB systems are recognized by the residential home building industry as an effective way to reduce long-term potential wall moisture problems. WRB practices have been adopted in site-built codes and even the Manufactured Housing Standard NFPA501-2010 sections 6.2.1.2 and 6.7.1.3.1. WRB systems are also required by DOE, ASHRAE, EPA, and HUD in voluntary housing programs. Requiring a WRB system may reduce wall moisture problems such as mold, rot, and insects. Wall moisture-related problems may damage consumer property and may present potential negative health impacts. Reducing moisture problems may also lower risks to industry manufacturers, retailers, consumers, lenders, and insurance company property. During the MHCC meeting discussion, it was noted that manufactured home manufacturers follow window installation procedures detailed in installation manuals provided by window manufacturers. Window manufacturers that sell HUD code-approved windows have excluded a requirement for window flashings in their installation manuals because they do not want to upset their customers, such as large HUD-code corporations, in fear that they will lose their business. Adoption of this proposal levels the playing field so window installation practices follow those of the site built and modular industry
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Moisture-related problems, which show up long after the manufacturer warranty expires, result from failed cladding and/or window systems. The repair bill can easily be several thousand dollars. The proposal would add an estimated; $0.80 to $1.11 per window for window flashing and $0.20 to $0.30 per square foot for a WRB. Cost benefits are positive given the avoided maintenance expenses, increases resale benefits and extended useful life and/or home resale value.
Subcommittee Recommendation:	Approve (10-0-0)
MHCC Action:	Approve (19-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**2/10/2015 –** Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/3/2014** o MHCC Motion: Approve. o TSSC Recommendation: Approve.

	12/2/2014 – MHCC Motion: Refer to Technical Systems Subcommittee.

Log # 99 - § 3282.8 Applicability		Date: 11/24/2014
Submitter:	Matt Wald, RVIA	
Requested Action:	New Text	
Proposed Change:	**3282.8** (g) *Recreational vehicles.* Recreational vehicles are not subject to this part, part 3280, or part 3283. A recreational vehicle is a vehicle which is built on a single chassis and designed as temporary living quarters for recreational, camping, travel, or seasonal use and built in compliance with consensus standards for such products, including: (1) a self-propelled motorhome or recreational vehicle trailer that is towed by another vehicle without a special highway use permit and is regulated by the National Highway Traffic Safety Administration as a vehicle, and (2) a park model recreational vehicle that has a gross area of not greater than 400 square feet based on the exterior dimensions of the unit measured at the largest horizontal projections in the setup mode, excluding any loft area having less than 5 feet in ceiling height, roof overhangs, and exterior porch or deck area 10 feet or less in length that is not enclosed other than by guardrails. ~~(1) Built on a single chassis;~~ ~~(2) 400 Square feet or less when measured at the largest horizontal projections;~~ ~~(3) Self-propelled or permanently towable by a light duty truck; and~~ ~~(4) Designed primarily not for use as a permanent dwelling but as temporary living quarters for recreational, camping, travel, or seasonal use.~~	
Reason:	Recreation vehicles (RV) are not manufactured housing: they are not designed nor built to be permanent residences, they do not have a HUD label (tag), their manufacturers do not seek to attach a HUD label to them, and manufacturers are not seeking federal preemption from state or local regulations of RVs. The Department of Housing and Urban Development (HUD) and, specifically, the HUD Office of Manufactured Housing regulates manufactured housing. Manufactured housing, designed and built to HUD standards under the HUD Office of Manufactured Housing program, are permanent residences. Recreational vehicles are designed and built to provide temporary living quarters for camping, recreational or seasonal use. Most, in fact, are vehicles. Therefore, RVs are statutorily outside the scope of HUD's manufactured housing program, regulation and standards. These proposed amendments to the applicable regulations will clarify RVs' status under the law. RVs and their use are regulated by: • The National Highway Traffic Safety Administration (NHTSA) • State maximum vehicle dimension laws which limit the length, width and height of all vehicles • State Motor Vehicle Departments • State RV standards requirements • Local zoning laws and regulations • ANSI/NFPA RV consensus standards RVIA's proposed amendments to HUD's regulations, by clarifying that RVs are excluded from the definition of manufactured housing, avoids conflicts and tensions between regulatory regimes and unnecessary overregulation of the RV industry. The current HUD regulation defining "recreational vehicles" as excluded from the HUD manufactured housing standards program is 32 years old. The definition does not reflect the evolution of RVs over the past three decades or the regulatory scheme they operate under today. Since the current definition was written in 1982, park model RVs with porches have become a common RV choice in American campgrounds. Fifth wheel and travel trailer RVs have evolved to meet consumer demand, including the advent of slide-out rooms. These innovations in response to consumer demand do not pose any additional safety or health risks to the public, as evidence by the fact that state highway laws have allowed vehicles, including travel trailers and fifth wheels, to become larger. The HUD definition of "recreational vehicle" must be updated to reflect the modern RV industry, current state maximum vehicle dimension laws, technology improvements, and consumer preferences rather than relying on regulatory policies that were created over a generation ago when electric typewriters and cassette tapes were	

	cutting edge technology. RVIA's proposed amendments to HUD's regulations would create a modern, clear, simple and bright line between manufactured housing and recreational vehicles. Consumers, regulators, manufacturers, campground owners, dealers, and other stakeholders will be able to clearly and easily understand the distinction between modern manufactured housing that bears a HUD label and modern RVs that provide temporary living quarters for camping, recreational or seasonal use. As a result, there will be less need for enforcement action by the Office of Manufactured Housing as the industry will be better able to bring itself into compliance with the new regulations. Both the RV industry and the manufactured housing industry will benefit, as will consumers. These proposed amendments to the HUD regulations are supported by the recreation vehicle manufacturers, dealers, and the manufactured housing industry as well as the campground and RV park industry. In a letter to Administrator Danner (attached), RVIA requests HUD's support of these changes as well as sub-regulatory action to mitigate the effect of the outdated definition while updates to the regulation are considered.
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	There are no costs associated with this proposal. To the contrary, confusion caused by the existing regulations and the interpretive bulletins issued under them have created circumstances in which a failure to promulgate an amended regulation on an expedited basis will lead to significantly increased costs. The October 1, 2014, HUD Office of Manufactured Housing policy memo affects current park models with porches that extend beyond 400 square feet, worth approximately $454 million , and has pushed manufacturers that had intended to build additional park models into a regulatory limbo that could lead to closing down their businesses or substantial product lines. While accurate dollar value estimates do not currently exist, jobs and sales revenue will be lost for manufacturers and dealers if the regulations are not amended as proposed. In addition, campgrounds face the risk of being required to prohibit the use of park models or risk new regulation and taxation from state and local authorities. Millions of dollars in revenue and taxes could be at risk if the proposed new regulations are not promulgated quickly. Further, if the regulation is not amended to recognize the invention of slide out rooms (potentially allows slide out rooms to turn a recreational vehicle into manufactured housing) and continues to require that recreational vehicles be 'permanently towable by a light duty truck,' a term for which HUD currently has no definition' but which EPA defines as trucks 8500 GVWR and less, further costs will be incurred. Two and one-half million travel trailers, fifth wheels, and park model RVs would be classified as "manufactured housing" subject to HUD regulation if these regulatory changes are not made. The resulting cost to RV consumers, dealers, and manufacturers could total in the tens of billions of dollars. The benefits of this proposal to amend HUD's regulations extend beyond these avoided costs. Clarifying that modern RVs are not manufactured housing gives all elements of both industries, and consumers, regulatory certainty with regard to the modern line between RVs and manufactured housing. As a result, the industry's cost of compliance will be lower. Finally, the proposal frees the Office of Manufactured Housing to focus on regulating and updating standards for manufactured housing rather than spending time or resources attempting to make RVs conform to decades-out-of-date definitions.
Subcommittee Recommendation:	
MHCC Action:	Disapprove (19-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	In favor of action on Log 89.
Current Status:	MHCC Final Action Submitted to HUD

Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** – MHCC Motion: Disapprove.

Log # 100 - § 3280.204 Kitchen cabinet protection		Date: 11/24/2014
Submitter:	Lois Starkey, MHI	
Requested Action:	New Text	
Proposed Change:	(f) Range hood finish materials must be installed with a minimum 5/16" gypsum board or other limited or non-combustible substrate between the metal range hood and the decorative finish materials. Finish materials shall have a flame spread rating not exceeding 200. Sealants and other trim materials 2" or less in width are exempt from this provision.	
Reason:	Decorative range hoods are used widely in the homebuilding industry. This proposed changes is needed to ensure that the use of decorative range hood covers will meet the fire safety requirements of Subpart C of the Manufactured Home Construction and Safety Standards (24 CFR Part 3280). The proposal is more stringent then the International Residential Code (IRC) for One- to-Four Single Family Housing, which contains no such requirement.	
Substantiating Documents:	Yes Staff Note: No additional documents received.	
Additional Cost:	No	
Cost Benefit Explanation:	The proposal will update the standard to take into consideration current industry practices and at the same time meet appropriate fire safety requirements. The cost is minimal	
Subcommittee Recommendation:	Approve as Modified (9-0-0)	
MHCC Action:	Approve as Modified (21-0-0)	
MHCC Modification of Proposed Change:	**§3280.203 Flame spread limitations and fire protection requirements.** (b) Flame-spread rating requirements. (4) Exposed interior finishes adjacent to the cooking range shall have a flame spread rating not exceeding 50, except that backsplashes not exceeding 6 inches in height are exempted. Adjacent surfaces are the exposed vertical surfaces between the range top height and the overhead cabinets 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. (5) Kitchen cabinet doors, countertops, backsplashes, exposed bottoms, and end panels shall have a flame spread rating not to exceed 200. Cabinet rails, stiles, mullions, and top strips are exempted. (6) Finish surfaces of plastic bathtubs, shower units, and tub or shower doors shall not exceed a flame spread rating of 200. (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; non-horizontal surfaces above the horizontal plane formed by the bottom of the range hood are not considered exposed (iii) Interior walls and ceilings enclosing furnace and/or water heater spaces; and	

	(iv) Combustible doors which provide interior or exterior access to furnace and/or water heater spaces. The surface may be interrupted for louvers ventilating the enclosure. However, the louvers shall not be constructed of a material of greater combustibility than the door itself (e.g., plastic louvers on a wooden door). (2) No burner of a surface cooking unit shall be closer than 12 horizontal inches to a window or an exterior door with glazing. **§3280.204 Kitchen cabinet protection.** (a) The exposed 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 cooktops 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 space shall 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. (f) Range hood finish materials must be installed with at least 5/16" thick gypsum board or equivalent limited combustible material between the metal range hood and finish materials. Finish materials shall have a flame spread rating not exceeding 200. Sealants and other trim materials 2" or less in width are exempt from this provision.
MHCC Reason:	Modification is more inclusive. To ensure the protection of the consumer, and to allow for decorative range hoods. To clarify the protection requirements.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Approve as Modified. **7/15/2015** – SDSC Recommendation: Approve as Modified. **12/4/2014** – SDSC Motion: Refer Log 100 to Manuel Santana for further examination. **12/2/2014** – MHCC Motion: Refer to SDSC.

<table>
<tr><td colspan="2">Log # 101 - § 3280.611 Vents and venting</td><td>Date: 11/24/2014</td></tr>
<tr><td>Submitter:</td><td colspan="2">Lois Starkey, MHI</td></tr>
<tr><td>Requested Action:</td><td colspan="2">Revised Text</td></tr>
<tr><td>Proposed Change:</td><td colspan="2">§3280.611(c) Size of vent piping—(1) Main vents*******

§3280.611(c) Size of vent piping—(1) Main vents*******

(5) Distance of fixture trap from vent shall not exceed the values given in the following table:

Maximum Distance of Fixtures from Vent Trap
<table><tr><th>Size of fixture drain (inches)</th><th>Distance trap to vent</th></tr><tr><td>1-1/4</td><td><s>4 ft. 6 in</s>. 5 ft.</td></tr><tr><td>1-1/2</td><td><s>4 ft 6 in</s>. 6 ft.</td></tr><tr><td>2</td><td><s>5 ft.</s> 8 ft.</td></tr><tr><td>3</td><td><s>6 ft.</s> 12 ft.</td></tr></table></td></tr>
<tr><td>Reason:</td><td colspan="2">This proposal aligns the distance from the fixture trap to vent of the HUD code with that of the International Plumbing Code. The International Plumbing Code has been used for the construction of site built and modular homes for over a decade. The IPC was not around when the HUD code was first developed.</td></tr>
<tr><td>Substantiating Documents:</td><td colspan="2">No</td></tr>
<tr><td>Additional Cost:</td><td colspan="2">No</td></tr>
<tr><td>Cost Benefit Explanation:</td><td colspan="2">There is no cost associated with this proposal. it is an update to an out dated provision and aligns current construction and design practices with current codes.</td></tr>
<tr><td colspan="3"></td></tr>
<tr><td>Subcommittee Recommendation:</td><td colspan="2"></td></tr>
<tr><td>MHCC Action:</td><td colspan="2">Approve (19-0-0)</td></tr>
<tr><td>MHCC Modification of Proposed Change:</td><td colspan="2"></td></tr>
<tr><td>MHCC Reason:</td><td colspan="2"></td></tr>
<tr><td>Current Status:</td><td colspan="2">MHCC Final Action Submitted to HUD</td></tr>
<tr><td>Log History:</td><td colspan="2">2/10/2015 – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II.
12/3/2014 – MHCC Motion: Approve.</td></tr>
</table>

Log # 102 - § 3280.105 Exit facilities; exterior doors	Date: 11/24/2014
Submitter:	Lois Starkey, MHI
Requested Action:	New Text
Proposed Change:	**3280.105(a)(3)** One of the two required exit doors may discharge into an attached site-built garage provided the garage has an exit door that discharges to grade. An overhead garage door may not be used as an exit door.
Reason:	The proposed change is consistent with the current requirement for construction of single family site built homes. It allows for greater flexibility in home design and construction and eliminates problems that arise from designing homes with three egress doors. It reflects current building design and construction techniques, yet provides equal protection for to homeowners. The current IRC Codes require a home to have only one egress door (and it can be an egress door into a garage).
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Cost savings will result because it will avoid costs associated with having to meet the Alternative Construction approval requirements of the Procedural and Enforcement Regulations (24 CFR Part 3282).
Subcommittee Recommendation:	Disapprove (8-0-0) – The proposal is incomplete.
MHCC Action:	Disapprove (19-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	The proposal is incomplete.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/4/2014** o MHCC Motion: Disapprove. o SDSC Recommendation: Disapprove. o MHCC Motion: Refer to SDSC.

Log # 103 - § 3280.808 Wiring methods and materials	Date: 11/24/2014
Submitter:	Lois Starkey, MHI
Requested Action:	Revised Text
Proposed Change:	Proposed Change to 24 CFR Part 3280.808. Wiring Methods and Materials 3280.808 (k) When outdoor or under-chassis line-voltage wiring is exposed to moisture or physical damage, it shall be protected by ~~rigid metal~~ conduit listed for the intended use. The conductors shall be suitable for wet locations.
Reason:	The current requirement limits this application to rigid metal conduit. The 2005 NEC provides many different types of conduit that can be used for wet locations and/or locations where the conductors may be subject to physical damage.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	This is a update to the current code, and is a benefit because it allows for new materials and technologies to be utilized in the construction of manufactured homes.
Subcommittee Recommendation:	Approve as Modified (10-0-0)
MHCC Action:	Approve as Modified (19-0-0)
MHCC Modification of Proposed Change:	*Revise Standard as follows:* **3280.808 (k)** Where ~~When~~ outdoor or under-chassis line-voltage (120 volts, nominal or higher) wiring is exposed to moisture or physical damage, it must be protected by a ~~rigid metal~~ conduit or raceway approved for use in wet locations or where subject to physical damage. ~~or intermediate metal conduit listed for the intended use~~. The conductors must be suitable for wet locations. ~~Electrical metallic tubing or rigid nonmetallic conduit is permitted to be used when closely routed against frames and equipment enclosures.~~
MHCC Reason:	Modification removes the requirement that the conduit be rigid metal and expands the possible materials to anything that is acceptable and listed for use in this manner.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/4/2014** o MHCC Motion: Approve. o TSSC Recommendation: Approve as Modified**.** **12/3/2014** – MHCC Motion: Refer to TSSC.

Log # 104 - § 3285.5 Definitions & § 3285.801 Exterior close-up	Date: 11/24/2014
Submitter:	Lois Starkey, MHI
Requested Action:	New Text
Proposed Change:	**PART 3285—MODEL MANUFACTURED HOME INSTALLATION STANDARDS** **In §3285.5**, in alphabetic order, add the definitions for ''peak cap assembly'' and ''peak flip assembly'' to read as follows: §3285.5 Definitions. * * * * <u>* Peak cap assembly means any roof peak assembly that is either shipped loose or site completed and is site installed to finish the roof ridge/peak of a home. Peak flip assembly means any roof peak assembly that requires the joining of two or more cut top chord members on site. The cut top chords must be joined at the factory by straps, hinges, or other means. *</u> * * * **In §3285.801**, revise paragraph (f)(2) to read as follows: §3285.801 Exterior close-up. * * * * * (f) *Hinged roofs and eaves.* Hinged roofs and eaves must be completed during installation in compliance with all requirements of the Manufactured Home Construction and Safety Standards (24 CFR Part 3280) and the Manufactured Home Procedural and Enforcement Regulations 24 CFR Part 3282). Unless exempted by the following provisions, hinged roofs are also subject to a final inspection for compliance with the Manufactured home Construction Standards (24 CFR Part 3280) by the IPIA or a qualified independent inspector acceptable to the IPIA. Homes with hinged roofs that are exempted from IPIA inspection are instead to be completed and inspected in accordance with the Manufactured Home Installation Program (24 CFR Part 3286). This includes homes: 1. That are designed to be located in Wind Zone I: 2. In which the roof pitch of the hinged roof is less than 7:12, <u>including designs incorporating peak cap or peak flip assembly components;</u> 3. In which fuel burning appliance flue penetrations are not above the hinge
Reason:	In 2009 under a formal opinion letter by the former program administrator for Manufactured Housing, HUD issued Alternate Construction (AC) approvals for certain specified roof ridge designs without a requirement for specific on-site IPIA inspections. HUD has changed its position for any new approvals of these types of ridge assemblies, and going forward, will require an on-site IPIA inspection as a condition for approval of these types of designs. MHI believes that hinged roof assemblies, known as double hinged or "peak flip" assemblies and ridge box or "peak cap" assemblies, that meet the requirements of §3285.801(f) do not need AC letters and should be covered by the requirements for set-up under 24 CFR Part 3285. These types of hinged roof designs do not violate any section of the standards (§3280), and thus do not qualify for or require AC letters as prescribed under §3282.14. Pursuant to §3285.801, certain hinged roofs are exempted from on-site inspection by Production Inspection Primary Inspection Agencies (IPIA's). This exemption includes homes that: (1) that are designed to be located in Wind Zone 1; (2) in which the pitch of the hinged roof is less than 7:12, and (3) in which fuel burning appliance flue penetrations are not above the hinge. As noted by both industry representatives and state regulators at the October, 2012 MHCC meeting, this type of roof installation is common throughout the country, for all types of factory-built housing, including those under applicable modular construction programs. The installation of these hinged roofs is much less complicated than most "close up" requirements for multi-section homes. The technology involved is not new and has been time-tested without failures. Licensed and trained installers must install these homes in accordance with the manufacturer's installation instructions and meet all other provisions, including inspections, of 24 CFR Parts 3285 and 3286, Model Manufactured Home Installation Standards and Manufactured Housing Installation Rules and Regulations.
Substantiating Documents:	Yes Staff Note: No additional documents received.

Additional Cost:	No
Cost Benefit Explanation:	This will be beneficial by incorporating current design practices into the regulations, and eliminate unnecessary IPIA inspections.
Subcommittee Recommendation:	
MHCC Action:	Approve (19-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	MHCC Final Action Submitted to HUD
Log History	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/3/2014** – MHCC Motion: Approve.

Log # 105 - § 3282.8 Applicability		Date: 11/24/2014
Submitter:	Lois Starkey, MHI	
Requested Action:	New Text	
Proposed Change:	Add the following (underlined language) to 24 CFR Part 3282.8 (g)Recreational vehicles. Recreational vehicles are not subject to this part, part3280, or part 3283. A recreational vehicle is a vehicle which is: (1) built on a single chassis; (2) 400 square feet or less when measured at the largest horizontal projections <u>in the setup mode, excluding any loft area having less than 5 feet in ceiling height, roof overhangs, and exterior porch or deck area less than 10 feet in length and not enclosed other than by guardrails</u>; (3) Self-propelled or permanently towable by a light duty truck; and (4)Designed primarily not for use as a permanent dwelling but as temporary living quarters, for recreational, camping travel, or seasonal use	
Reason:	The proposal clarifies that porches and roof overhangs an RV/park model may be excluded from the measurement requirements of HUD's Interpretative Bulletin A-I-88 and 24 CFR 3282.8(g). This address confusion that has arisen in the marketplace between a manufactured home and a towable, RV/Park models. Recreation vehicles (RV) are not manufactured housing: they are not designed nor built to be permanent residences, they do not have a HUD label (tag). There is no additional cost associated with this proposal	
Substantiating Documents:	No	
Additional Cost:	No	
Cost Benefit Explanation:	This will benefit consumers by eliminating any confusion between manufactured homes a RV Park Models or Recreational Park Trailers.	
Subcommittee Recommendation:		
MHCC Action:	Disapprove (19-0-0)	
MHCC Modification of Proposed Change:		
MHCC Reason:	In favor of action on Log 89.	
Current Status:	MHCC Final Action Submitted to HUD	
Log History	**2/10/2015** – Final Action from December 2-4, 2014 meeting confirmed by MHCC Ballot II. **12/2/2014** – MHCC Motion: Disapprove.	

Log # 106 - § 3282.362 Labels	Date: 11/25/2014
Submitter:	Lois Starkey, Manufactured Housing Institute
Requested Action:	Revised Text
Proposed Change:	**24 CFR3282.362** - Production Inspection Primary Inspection Agencies (IPIAs). (c)(2)Labeling— (i)Labels required. (A) The IPIA shall <u>continuously</u> provide the manufacturer with a ~~two– four-week~~ supply (at the convenience of the IPIA and the manufacturer) of the labels described in this subsection, except that no labels shall be issued for use when the IPIA is not present if the IPIA is not satisfied that the manufacturer can and is producing manufactured homes which conform to the design and, as appropriate, to the standards.
Reason:	This proposal is needed to address problems in recent years, of label shortages. There have been several such occasions in the last two years when Congressional budget impasses have led to a government wide shutdown. Also State IPIAs who serve a number of manufacturers, have had problems with allocations when production increases unexpectedly.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposed will be beneficial to consumers because sales will not be constrained by arbitrary limits on the number of labels that can be purchased by manufacturers. Should there be a need to limit label distribution, HUD can do so under its compliance and enforcement authority.
Subcommittee Recommendation:	
MHCC Action:	Disapprove (21-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	The committee does not want to supply manufacturers with a large number of labels that could be lost. The supply problem to IPIAS has been addressed.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Disapprove.

Log # 107 - § 3280.2 Definitions		Date: 11/25/2014
Submitter:	Lois Starkey, Manufactured Housing Institute	
Requested Action:	Revised Text	
Proposed Change:	**Proposed Change to 24 CFR Part 3280.2 Definitions.** *Certification label* means the approved form of certification by the manufacturer that, under ~~§3280.8~~ §3280.11, is permanently affixed to each transportable section of each manufactured home manufactured for sale in the United States.	
Reason:	This section corrects a typographical error. The section in the HUD Code that addresses certification requirements is §3280.11. §3280.8 deals with waivers.	
Substantiating Documents:	No	
Additional Cost:	No	
Cost Benefit Explanation:	This is an editorial change only.	
Subcommittee Recommendation:		
MHCC Action:	Approve (21-0-0)	
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	MHCC Final Action Submitted to HUD	
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Approve.	

Log # 108 - § 3280.607 Plumbing fixtures	Date: 12/08/2014
Submitter:	Ross Kinzler
Requested Action:	New Text
Proposed Change:	(7) Accessible shower or bath tubs. These fixtures designed to accommodate individuals with special needs shall be installed in accordance with the manufacturer's instructions not withstanding other requirements of this section.
Reason:	Manufacturers routinely reject requests for walk-in, zero step entry or other accessible bathing fixtures because of limitations imposed by 3280.607 for minimum dam heights and traps. This new language would permit in plant installation of bathing systems designed to serve the handicapped but may not conform to other sections of the HUD Code provided that they are installed in accordance with the fixture's manufacturer provided instructions.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Consumers report to us that they often have to order a home with a standard bath only to bear the cost of demolishing the new bath just to install a handicap accessible unit. The new language should also avoid the need for an AC letter for those manufacturers that want to be customer focused and install the correct bath in the plant.
Subcommittee Recommendation:	
MHCC Action:	Approve as Modified (21-0-0)
MHCC Modification of Proposed Change:	3280.607(b)(3) (3) *Shower compartment.* (i) Each compartment stall ~~shall~~ must be provided with an approved watertight receptor with sides and back extending at least 1 inch above the finished dam or threshold. Except as provided by 3280.607(b)(3)(v), ~~In no case shall~~ the depth of a shower receptor must not 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~~ must 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~~ must form a watertight joint with each other and with the bathtub, receptor or shower floor. The floor of the compartment ~~shall~~ must slope uniformly to the drain at not less than one-fourth nor more than one-half inch per foot. (v) Thresholds. Thresholds in roll-in-type shower compartments must be 1/2 inch maximum in height in accordance with 3280.607(b)(3)(vi). In transfer-type shower compartments, thresholds 1/2 inch maximum in height must be beveled, rounded, or vertical. (vi) Changes in level of 1/4 inch maximum in height must be permitted to be vertical. Changes in level greater than 1/4 inch in height and not more than 1/2 inch maximum in height must be beveled with a slope not steeper than 1:2.
MHCC Reason:	To comply with ICC disability standards for roll in showers.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III A. **8/20/2015** – MHCC Motion: Approve as Modified.

Log # 109 - § 3280.210, Subpart C	Date: 12/16/2014
Submitter:	David Karmol
Requested Action:	New Text
Proposed Change:	**24 CFR 3280.210** Fire and Life Safety Detection and Suppression Systems. All manufactured home dwelling units shall comply with the following life safety requirements of *2015 International Residential Code for One and Two Family Dwelling Units*©(IRC). Residential Fire Sprinkler Systems (R313.2) Interconnected Smoke Alarms (R314) Carbon Monoxide Alarms (R315) *(All of the cited 2015 International Residential Code (IRC) requirements can be found in Chapter 3 of the code, which is available for viewing at codes.iccsafe.org)*
Reason:	The International Residential Code(IRC) is adopted throughout the United States, and since the 2009 edition, Section R313 has required the installation of automatic fire sprinklers in all new residential dwelling units. This requirement is intended to reduce the risks associated with the change in materials of construction, as well as the significant changes in the materials of housing unit room contents and furnishings, which has dramatically raised the risk of fire related deaths and injuries in new homes. These changes have affected all new dwellings, including manufactured homes. The IRC has required smoke alarms since the 2000 version, and has required carbon monoxide detectors for certain housing units since 2006.All of these requirements are minimum life safety requirements, of minimal cost, with demonstrated proof that they save thousands of lives annually. We believe that most new manufactured homes are already protected by smoke alarms, and technology has made interconnected smoke alarms a sensible, and almost zero additional cost requirement in the new IRC. Likewise, carbon monoxide detectors are required where a fuel-fired appliance is installed in the dwelling unit, and such detectors are often combined in a single system with smoke alarms, which the code recognizes and permits. The requirement for a sprinkler system follows the evidence that where sprinklers are installed in all new homes the incidence of significant fires is dramatically reduced, property damage is dramatically lessened, and most important, deaths from fire are eliminated as a risk, both to the occupants, and to first responders who answer calls when a fire breaks out. In the one jurisdiction where sprinkler systems have been required in new residential dwellings, the record is clear: not a single death, to either a firefighter or occupant, has occurred in a sprinklered home for nearly thirty years. This is a remarkable statistic, and argues strongly in favor of sprinkler installation. That jurisdiction (Scottsdale, AZ) is one where construction and home sales were booming over those same twenty years, putting to rest the false claim that requiring sprinklers would damage home sales, or make homes too expensive. See Scottsdale Sprinkler System Reliability report: http://www.usfa.fema.gov/pdf/efop/efo42677.pdf The fact is that site built homes and manufactured homes share one of the key risk factors for fires: an increase in the flammability of home furnishings that has been well documented, and is a reason that more and more fires are not survivable, especially for the elderly and the very young, who often cannot escape in time. Likewise, the faster flashover time with newer home furnishings and materials, means that the fire department often cannot reach a fire before the home becomes impossible for firefighter to enter, rescue trapped occupants or extinguish the blaze. There is no reason that fire and life safety protection should be less for those who purchase lower cost manufactured housing than for those who purchase site-built housing. And the cost to install such systems should be less in manufactured housing than in site-built housing, due to the lack of separate inspections, the ability to design common systems, and the cost reductions that accompany mass production. In fact, the cost of installing automatic sprinkler systems in Scottsdale, AZ site built homes has declined from over $1.00 per square foot of protected space to

	around $.59/sf, over the course of the years the requirement has been in place, despite generally rising construction costs over the same period. The same economies of scale should be expected with manufactured housing. See, Automatic Sprinklers, a Ten Year Study (http://www.ircfiresprinkler.org/docs/scottsdale%20sprinklers%2010%20year%20report.pdf) The NFPA Research Foundation has release a study showing the cost of installing residential fire sprinkler systems for on-site construction to be an average of $1.35/sq. ft. Link: http://www.nfpa.org/research/fire-protection-research-foundation/reports-and-proceedings/suppression/home-fire-sprinklers/home-fire-sprinkler-cost-assessment-final-report It is reasonable to presume the cost would be lower for manufactured housing based on the efficiencies that can be achieved with installation at the manufacturing facility. Two recent fires in manufactured homes, one in Edna, TX and the other in Portland, ME, which together claimed the lives of nine people- seven children and two adults- should be reason enough for the HUD MHCC to immediately mandate the same protection for manufactured homes as is now required in the International Residential Code for site built homes, which is used as the basis for residential building codes in 49 of the 50 states. See reports in FireRescue1: http://www.firerescue1.com/children/articles/2029347-5-children-killed-in-Texas-mobile-home-fire/
Substantiating Documents:	No
Additional Cost:	Yes
Cost Benefit Explanation:	The estimated cost for automatic fire sprinklers is for additional cost of less than $1.00 per square foot of dwelling unit space, based on the cost of installation of sprinklers in site built homes, where transportation costs, specialized labor costs, and coordination and inspection costs are all higher than with manufactured housing. When a home is equipped with plumbing, the additional cost of installing automatic fire sprinklers is minimal, as the fire sprinklers simply require the additional installation of flexible piping, and sprinkler heads in the rooms/locations as required by the code. The following studies support the cost in site built homes: http://www.ircfiresprinkler.org/docs/scottsdale%20sprinklers%2010%20year%20report.pdf and http://www.nfpa.org/research/fire-protection-research-foundation/reports-and-proceedings/suppression/home-fire-sprinklers/home-fire-sprinkler-cost-assessment-final-report Interconnected smoke alarms will add no cost to the cost of smoke alarms, as almost all smoke alarms sold today are available with the interconnect feature, at prices equivalent to the price of non-interconnected smoke alarms ($12-31.00 retail) Carbon Monoxide detectors are available, at retail prices of between $7.00 and $50.00 on Amazon.com, and it is likely that they can be purchased at wholesale prices of considerably less. Link: http://www.amazon.com/carbon-monoxide-detector/b?ie=UTF8&node=495272 Combination smoke and carbon monoxide detectors are also commonly available, at prices not much higher than the cost of simple smoke detectors. At most, the cost of installing interconnected smoke alarms, and carbon monoxide detectors would be less than $100.00 per manufactured home.
Subcommittee Recommendation:	
MHCC Action:	Disapprove (21-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	The committee does not feel that mandatory sprinklers are appropriate.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Disapprove.

Log # 110 - § 24 CFR 3280.211, Subpart C		Date: 12/16/2014
Submitter:	David Karmol	
Requested Action:	New Text	
Proposed Change:	**24 CFR 3280.211** Life Safety and Structure Resilience. All manufactured home dwelling units shall comply with the flood safety requirements of *International Residential Code for One and Two Family Dwelling Units* ©(IRC). Flood resistant construction (R322) with specific requirements for Manufactured Homes in R322.1.9	
Reason:	The reason for this section is to mandate that manufactured homes be installed in accordance with section R322 of the IRC, including Sec. R322.1.9 which includes specific requirements for manufactured homes. This section requires manufactured housing located in coastal high hazard flood zones to be installed on a foundation at or above the flood plain elevation, as well as meeting anchor and tie-down provisions in compliance with local, state and federal requirements referenced in that section. The referenced section, which includes provisions addressing manufactured homes in high hazard coastal zones, is also a minimum requirement, and should apply to manufactured homes in the same way provisions of Sec. R322 apply to site built homes in such zones.	
Substantiating Documents:	No	
Additional Cost:	Unknown	
Cost Benefit Explanation:	This cost cannot be estimated, as this proposed section is a cost associated with installation of manufactured housing, and will be entirely dependent on where the housing is installed. If the manufactured housing unit is installed in a high hazard flood zone, there may be some additional cost to elevating the foundation to meet the requirements of the code, which will be entirely dependent on the individual site. There should be no additional cost to manufacture the housing unit, as there are no tie down or anchor requirements other than those already required under local, state or federal laws and regulations. If a manufactured housing unit is installed anywhere outside of a high hazard flood zone, there would be no cost impact to this proposed change.	
Subcommittee Recommendation:		
MHCC Action:	Disapprove (21-0-0)	
MHCC Modification of Proposed Change:		
MHCC Reason:	Already addressed in 3285.302.	
Current Status:	MHCC Final Action Submitted to HUD	
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Disapprove.	

Log # 111 - § 3280.2 Definitions; 3280.105 Exit Facilities, 3280.205 Fire Blocking	Date: 12/31/2014
Submitter:	Lois Starkey
Requested Action:	New Text
Proposed Change:	Revise 24 CFR 3280.2 as follows: "Dwelling Unit" means ~~one or more habitable rooms which are designed to be occupied by one family with facilities for living sleeping and eating.~~ A structure designed and constructed for use as a permanent residence by one or more persons, with facilities for sleeping, eating, cooking and sanitation, which constitute an independent living unit. Add to 24 CFR Part 3280.206 Fire Blocking a. *General.* Manufactured homes designed for one dwelling unit must meet the fire blocking requirements of this section. The integrity of all materials must be maintained. Manufactured Homes designed for more than one dwelling units must meet fire blocking and separation requirements which are comparable to those provided for in the other residential building codes for multifamily housing. Add to 24 CFR Part 328.105; Exit Facilities; exterior doors, add a new subsection: a. *General.* Manufactured homes designed for one dwelling unit must meet the egress requirements of this section. Manufactured homes designed for multifamily dwellings must meet egress requirements which are comparable to those provided for in other residential building codes for multifamily housing. Revise existing subsections (a) to (b) and (b) to (c).
Reason:	This proposal will provide for the design and construction of manufactured housing for multifamily use. The current regulations are limited to single family design and construction.
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	The proposal does not envision additional costs, beyond costs that are already incurred in the normal design and construction process. In fact, this proposal could save costs by elimination duplicative design, design approval and certification requirements required by modular building codes and programs.
Subcommittee Recommendation:	
MHCC Action:	Disapprove (21-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	In favor of action on Log 128.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Disapprove.

Log # 112 - § 3280.4(b) Incorporation by reference		Date: 12/31/2014
Submitter:	Gary Clark	
Requested Action:	Revised Text	
Proposed Change:	Air-Conditioning, Heating, & Refrigeration Institute (AHRI), ~~4100 North Fairfax Drive, Suite 200,~~2111 Wilson Boulevard, Suite 500, Arlington, VA 22203~~1~~, telephone number 703-524-8800, fax number 703-~~528-38165~~562-1942, Web site: ~~*http://www.lightindustries.com/ARI/*~~ *www.ahrinet.org*.	
Reason:	Reference to ARI within various sections of the document needs to be modified to "Air-Conditioning, Refrigeration, and Heating Institute (AHRI)." AHRI moved to a different location in Arlington, VA in 2008, so the address and the contact information within the regulation also needs to be updated. All references to "ARI" within the regulation need to be updated to "AHRI."	
Substantiating Documents:	No	
Additional Cost:	Unknown	
Cost Benefit Explanation:	Unknown	
Subcommittee Recommendation:		
MHCC Action:	Approve (21-0-0)	
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	MHCC Final Action Submitted to HUD	
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Approve.	

Log # 113 - § 3280.4(b)(1) Incorporation by reference		Date: 12/31/2014
Submitter:	Gary Clark	
Requested Action:	Revised Text	
Proposed Change:	(1) ANSI/AHRI Standard 210/240-892008, Unitary Air-Conditioning and & Air-Source Heat Pump Equipment, IBR approved for §§3280.511(b), 3280.703, and 3280.714(a),	
Reason:	Reference to ANSI/ARI Standard 210/240-89 needs to be updated to "ANSI/AHRI 210/240-2008" in various sections of 24 CFR Part 3280. The latest versions of all AHRI standards can be downloaded on the following website: http://www.ahrinet.org/site/686/Standards/HVACR-Industry-Standards/Search-Standards	
Substantiating Documents:	No	
Additional Cost:	Unknown	
Cost Benefit Explanation:	Unknown	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	Tabled	
Log History:	**8/18/2015** – MHCC Motion: Table pending review of referenced standard.	

Log # 114 - § 3280.4(i)(20) Incorporation by reference	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	ANSI Z21.47-~~1990~~2012/CSA 2.3-2012 ~~with Addendum Z21.47a-1990 and Z21.47b-1992~~, Gas-Fired Central Furnaces ~~(Except Direct Vent System Central Furnaces)~~, IBR approved for §3280.703.
Reason:	Reference to ANSI Z21.47-1990 needs to be updated to "ANSI Z21.47-2012/CSA 2.3-2012." Also, direct vent is now included within the scope of the standard. Additional details can be accessed here: http://shop.csa.ca/en/canada/gas-fired-domestic-and-commercial-heating-equipment-and-air-conditioning/ansi-z2147-2012csa-23-2012-/invt/27020082012
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Tabled
Log History:	**8/19/2015** – MHCC Motion: Table pending review of referenced standard.

Log # 115 - § 3280.4(ff)(21) Incorporation by reference	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	UL 1995~~, 1995~~-2011, Heating and Cooling Equipment, ~~Second Edition, with 1999 revisions~~, IBR approved for §3280.703. Any future version of this standard is acceptable.
Reason:	References to UL 1995 need to be updated from the second edition to "UL 1995-2011." Also, a note needs to be added stating "any future version of this standard is acceptable." The references to standards within 24 CFR Part 3280 are not being revised frequently enough to keep up with the latest editions of those standards. Adding this sentence would address the issue in a major way.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	Approve as Modified (8-0-0) UL 1995~~, 1995~~-2011, Heating and Cooling Equipment, ~~Second Edition, with 1999 revisions~~, IBR approved for §3280.703. ~~Any future version of this standard is acceptable.~~
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Pending MHCC Final Action
Log History:	**12/10/2015** – SDCS Recommendation: Approve as Modified. **8/19/2015** – MHCC Motion: Refer to Structure and Design Subcommittee.

Log # 116 - § 3280.4(aa)(2) Incorporation by reference	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	NFPA 54 ~~2002~~2015/ANSI Z223.1-2015, National Fuel Gas Code, IBR approved for §3280.703.
Reason:	References to National Fuel Gas Code needs to be updated from the 2002 edition to "NFPA 54-2015/ANSI Z223.1-2015"
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	Approve (10-0-0)
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Pending MHCC Final Action
Log History:	**12/2/2015** – TSSC Recommendation: Approve. **8/19/2015** – MHCC Motion: Refer to Technical Systems Subcommittee.

Log # 117 - § 3280.4(aa)(5) Incorporation by reference	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	NFPA 90B, Warm Air Heating and Air Conditioning Systems, ~~1996~~ 2015 Edition, IBR approved for §3280.703.
Reason:	References to NFPA 90B need to be updated from the 1996 edition to the 2015 edition.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	
MHCC Action:	Approve (21-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/19/2015** – MHCC Motion: Approve.

Log # 118 - § 3280.4 Incorporation by reference and 3280.703 Minimum standards	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	New Text
Proposed Change:	UL 60335-2-40,Safety of Household and Similar Electrical Appliances, Part 2-34: Particular Requirements for Motor-Compressors. Any future version of this standard is acceptable.
Reason:	A reference to the 2012 edition of the UL 60335-2-40 standard should be added within section 3280.703 since this standard deals with electrical safety of heat pumps, air conditioner and other household products that can be installed in manufactured homes. 24 CFR Part 3280 should also state that "any future version of this standard is acceptable." The references to standards within 24 CFR Part 3280 are not being revised frequently enough to keep up with the latest editions of those standards. Adding this sentence would address the issue in a major way.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	Approve as Modified (10-0-0) UL 60335-2-40 2012, Safety of Household and Similar Electrical Appliances, Part 2-34: Particular Requirements for Motor-Compressors. ~~Any future version of this standard is acceptable.~~
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Pending MHCC Final Action
Log History:	**12/2/2015** – TSSC Recommendation: Approve as Modified. **8/19/2015** – MHCC Motion: Refer to Technical Systems Subcommittee.

Log # 119 - § 3280.508(b) Heat loss, heat gain and cooling load calculations	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	The calculation of the manufactured home's transmission heat loss coefficient (Uo) must be in accordance with the fundamental principles of the ~~1997~~ latest edition of the ASHRAE Handbook of Fundamentals, Inch-Pound Edition, and, at a minimum, must address all the heat loss or heat gain considerations in a manner consistent with the calculation procedures provided in the document, Overall U-values and Heating/Cooling Loads—Manufactured Homes—February 1992-PNL 8006, HUD User No. 0005945.
Reason:	Section 3280.508 and some other sections within the regulation refer to ASHRAE 1997 Handbook for data. Reference to the most current version should be used.
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:	**8/19/2015** – MHCC Motion: Table until next meeting.

Log # 120 - § 3280.508(b) Heat loss, heat gain and cooling load calculations	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	The calculation of the manufactured home's transmission heat loss coefficient (Uo) must be in accordance with ACCA Manual J or the fundamental principles of the ~~1997~~ latest edition of ASHRAE Handbook of Fundamentals, Inch-Pound Edition, and, at a minimum, must address all the heat loss or heat gain considerations in a manner consistent with the calculation procedures provided in the document, Overall U-values and Heating/Cooling Loads—Manufactured Homes—February 1992-PNL 8006, HUD User No. 0005945.
Reason:	Section 3280.508(b) refers to a HUD document from 1992. The section should refer to the 2011 edition of ACCA Manual J which addresses the latest and most pertinent load calculations for manufactured homes.
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:	**8/19/2015** – MHCC Motion: Table until next meeting.

Log # 121 - § 3280.508(d) Heat loss, heat gain and cooling load calculations	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	(d) *High efficiency heating and cooling equipment credit.* The calculated transmission heat loss coefficient (Uo) used for meeting the requirement in §3280.506(a) may be adjusted for heating and cooling equipment above that required by the National Appliance Energy Conservation Act of 1987 (NAECA) by applying the following formula: Uo adjusted = Uo standard×[1+(0.6) (heating efficiency increase factor)+(cooling multiplier) (cooling efficiency increase factor)] where: Uo standard = Maximum Uo for Uo Zone required by §3280.506(a) Uo adjusted = Maximum Uo standard adjusted for high efficiency HVAC equipment Heating efficiency increase factor = The increase factor in heating equipment efficiency ~~measured by~~ based on the certified Annual Fuel Utilization Efficiency (AFUE), or the Heating Seasonal Performance Factor (HSPF) for heat pumps, above that required by NAECA (indicated as "NAECA" in formula). The formula is heating efficiency increase factor = AFUE (HSPF) home - AFUE (or HSPF) NAECA divided by AFUE (HSPF) NAECA. Cooling efficiency increase factor = the increase factor in the cooling equipment efficiency ~~measured by~~ based on the certified Seasonal Energy Efficiency Ratio (SEER) above that required by NAECA. The formula being cooling equipment=SEER home—SEER NAECA divided by SEER NAECA.
Reason:	Section 3280.508(d) mentions that the cooling efficiency increase factor is based upon "cooling equipment efficiency measured…" and a similar phrase is used for heating efficiency as well. This should be changed to be based upon the certified rating, so that it is in accordance with the U.S. Department of Energy requirements. Field measurement should not be required/allowed.
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:	**8/19/2015** – MHCC Motion: Table until next meeting.

Log # 122 - § 3280.511(a)(1) Comfort cooling certificate and information	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	(1) *Alternative I.* If a central air conditioning system is provided by the home manufacturer, the heat gain calculation necessary to properly size the air conditioning equipment shall be in accordance with procedures outlined in the 2011 edition of ACCA Manual J, or ~~chapter 22 of~~ the ~~1989~~ latest edition of the ASHRAE Handbook of Fundamentals, with an assumed location and orientation. The following shall be supplied in the Comfort Cooling Certificate: Air Conditioner Manufacturer Air Conditioner Model Certified Capacity ___ BTU/Hr. in accordance with the appropriate Air Conditioning and Refrigeration Institute Standards The central air conditioning system provided with this home has been sized, assuming an orientation of the front (hitch) end of the home facing ___ and is designed on the basis of a 75 °F indoor temperature and an outdoor temperature of _ °F dry bulb and _ °F wet bulb. Example Alternate I COMFORT COOLING CERTIFICATE Manufactured Home Mfg Plant Location Manufactured Home Model Air Conditioner Manufacturer Certified Capacity ___ BTU/Hr. in accordance with the appropriate Air Conditioning and Refrigeration Institute Standards. The central air conditioning system provided with this home has been sized assuming an orientation of the front (hitch end) of the home facing ___. On this basis, the system is designed to maintain an indoor temperature of 75 °F when outdoor temperatures are _ °F dry bulb and _ °F wet bulb. The temperature to which this home can be cooled will change depending upon the amount of exposure of the windows to the sun's radiant heat. Therefore, the home's heat gains will vary dependent upon its orientation to the sun and any permanent shading provided. Information concerning the calculation of cooling loads at various locations, window exposures and shadings are provided in the 2011 edition of ACCA Manual J, or ~~chapter 22 of the 1989~~ the latest edition of the ASHRAE Handbook of Fundamentals.
Reason:	Section 3280.511 refers to chapter 22 of ASHRAE 1989 Fundamentals for heat gain. The section should refer to the 2011 edition of ACCA Manual J which addresses load calculations for manufactured homes, or at a minimum the latest version of the ASHRAE fundamentals. The reference to the 1989 edition is located in several sections of 24 CFR part 3280 and needs to be revised.
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:	**8/19/2015** – MHCC Motion: Table until next meeting.

Log # 123 - § 3280.511(a)(2) Comfort cooling certificate and information	Date: 12/31/2014
Submitter:	Gary Clark
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:	**8/19/2015** – MHCC Motion: Table until next meeting.

Log # 124 - § 3280.714(a)(1)(ii) Appliances, cooling	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	(ii) Heat pumps must be certified to comply with all requirements of the ANSI/AHRI Standard 210/240-~~89~~2008, Unitary Air Conditioning ~~and~~ & Air-Source Heat Pump Equipment. Electric motor-driven vapor compression heat pumps with supplemental electrical resistance heat must be sized to provide by compression at least 60 percent of the calculated annual heating requirements for the manufactured home being served. A control must be provided and set to prevent operation of supplemental electrical resistance heat at outdoor temperatures above 40 °F (4 °C), except for defrost conditions. (Variable speed and two speed systems can typically meet such requirements.) Electric motor-driven vapor compression heat pumps with supplemental electric resistance heat conforming to ANSI/AHRI Standard 210/240-~~89~~2008, Unitary Air Conditioning ~~and~~ & Air-Source Heat Pump Equipment, must have Heating Season Performance Factor (HSPF) efficiencies not less than as specified in the 10 CFR Part 430, Energy Conservation Program for Consumer Products: Central Air Conditioners and Heat Pumps Energy Conservation Standards.
Reason:	Section 3280.714(a)(1)(ii) should explicitly note that the compression and control requirements specified within the section can be met by variable speed and two speed systems.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	
MHCC Action:	Approve as Modified (21-0-0)
MHCC Modification of Proposed Change:	*In Section 3280.714 (a)* Update ARI Standard 210/240-89, Unitary Air Conditioning and Air-Source Heat Pump Equipment. *To* ANSI/AHRI Standard 210/240-~~89~~2008, Unitary Air Conditioning ~~and~~ & Air-Source Heat Pump Equipment.
MHCC Reason:	Change to standard should be repeated throughout entire section.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/19/2015** – MHCC Motion: Approve as Modified.

<table>
<tr><td colspan="2">Log # 125 - § 3280.714(a)(1)(iii) Appliances, cooling</td><td>Date: 12/31/2014</td></tr>
<tr><td>Submitter:</td><td colspan="2">Gary Clark</td></tr>
<tr><td>Requested Action:</td><td colspan="2">Deleted Text</td></tr>
<tr><td>Proposed Change:</td><td colspan="2">~~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~~
<table><tr><th>~~Temperature degrees fahrenheit~~</th><th>~~Coefficient of performance~~</th></tr><tr><td>~~47~~</td><td>~~2.5~~</td></tr><tr><td>~~17~~</td><td>~~1.7~~</td></tr><tr><td>~~0~~</td><td>~~1.0~~</td></tr></table></td></tr>
<tr><td>Reason:</td><td colspan="2">The minimum COP requirement at various temperatures must be removed due to conflict with federal preemption laws. The COP requirements go beyond the federal HSPF requirements and must not be specified in the regulation. The regulation, as currently written, is a violation of Federal law and needs to be revised with immediate effect.</td></tr>
<tr><td>Substantiating Documents:</td><td colspan="2">No</td></tr>
<tr><td>Additional Cost:</td><td colspan="2">Unknown</td></tr>
<tr><td>Cost Benefit Explanation:</td><td colspan="2">Unknown</td></tr>
<tr><td colspan="3"></td></tr>
<tr><td>Subcommittee Recommendation:</td><td colspan="2"></td></tr>
<tr><td>MHCC Action:</td><td colspan="2">Approve (21-0-0)</td></tr>
<tr><td>MHCC Modification of Proposed Change:</td><td colspan="2"></td></tr>
<tr><td>MHCC Reason:</td><td colspan="2"></td></tr>
<tr><td>Current Status:</td><td colspan="2">MHCC Final Action Submitted to HUD</td></tr>
<tr><td>Log History:</td><td colspan="2">12/4/2015 – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III.
8/20/2015 – MHCC Motion: Approve.</td></tr>
</table>

Log # 126 - § 3280.715(a)(3)(ii) Circulating air systems	Date: 12/31/2014
Submitter:	Gary Clark
Requested Action:	Revised Text
Proposed Change:	The refrigerated air cooling supply duct system including registers must be capable of handling at least ~~300 cfm per 10,000 btuh~~ 360 CFM/ton with a static pressure no greater than 0.3 inches of water when measured at room temperature. In the case of application of external self contained comfort cooling appliances or the cooling mode of combination heating/cooling appliances, either the external ducts between the appliance and the manufactured home supply system shall be considered part of, and shall comply with the requirements for the refrigerated air cooling supply duct system, or the connecting duct between the external appliance and the mobile supply duct system shall be a part of the listed appliance. The minimum dimension of any branch duct shall be at least $1^1/_2$ inches, and of any main duct, $2^1/_2$ inches.
Reason:	Instead of specifying 300 CFM per 10,000 Btu/h, the requirement should mention 360 CFM/ton, especially since this requirement pertains to just the supply duct. Such a revision would make the section consistent with standard industry practice.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	
MHCC Action:	Disapprove (21-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	No substantiation by the submitter, and the unit change would cause confusion.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/20/2015** – MHCC Motion: Disapprove.

Log # 127 - § 3280.607(b)(3)(v) Shower compartment		Date: 5/01/2015
Submitter:	Mark Conte	
Requested Action:	New Text	
Proposed Change:	Shower, bathtub, and tub-shower combination valves must be balanced pressure, thermostatic, or combination mixing valves that conform to the requirements of ASSE 1016-2005, Performance Requirements for Automatic Compensating Values for Individual Shower and Tub/Shower Combinations (incorporated by reference, see Sec. 3280.4). Such valves must be equipped with handle position stops that are adjustable in accordance with the valve manufacturer's instructions to a maximum setting of 120 [deg]F. <u>If the valves require adjustment and/or testing during the installation/set-up of the home, the manufacturer must attach a label to each such valve and fixture as a notification to the home installer and consumer.</u>	
Reason:	I believe that failing to notify the consumer or manufactured home installer that these valves require field adjustment places consumers at risk. A note in the installation manual will certainly be overlooked by the majority of installers or consumers.	
Substantiating Documents:	No	
Additional Cost:	No	
Cost Benefit Explanation:	The added cost to produce and attach a label will be negligible.	
Subcommittee Recommendation:		
MHCC Action:	Disapprove (18-3-0)	
MHCC Modification of Proposed Change:		
MHCC Reason:	Committee does not think that the proposed change is enough to address the problem.	
Current Status:	MHCC Final Action Submitted to HUD	
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/20/2015** – MHCC Motion: Disapprove.	

Log # 128 - § 3280.211 New Section	Date: 5/11/2015
Submitter:	General Subcommittee - Mark Mazz
Requested Action:	New Text
Proposed Change:	*Revise and Add new text to 3280 as follows:* **3280.2 Definitions.** *Manufactured home* means a structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length or which when erected on-site is 320 or more square feet, and which is built on a permanent chassis and designed **to be used as a dwelling** with or without a permanent foundation ... *Dwelling* means any structure that contains one to a maximum of three dwelling units, designed to be occupied for residential living purposes. … *Dwelling unit* means a single unit providing complete independent living facilities for one or more persons, where the occupancy is primarily permanent in nature, including permanent provisions ~~one or more habitable rooms which are designed to be occupied by one family with facilities~~ for separate living, sleeping, cooking, sanitation, and eating… **3280.211 Multi-Unit Dwellings.** (a) In structures with more than one dwelling unit, each dwelling unit shall be separated from each other by wall and floor assemblies having not less than a 1-hour fire-resistance rating when tested in accordance with ASTM E119-14 or UL263-2014 or not less than a 1-hour fire-resistance when calculated in accordance with Chapter 16 of National Design Specification for Wood Construction - 2015. Fire-resistance-rated floor/ceiling and wall assemblies shall extend to and be tight against the exterior wall, and wall assemblies shall extend from the foundation to the underside of the roof sheathing. Exceptions: (1) Wall assemblies need not extend through attic spaces where the ceiling is protected by not less than 5/8 -inch Type X gypsum board, and attic draft stop constructed as specified in Section 3280.212 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-inchgypsum board or equivalent. (b) *Supporting Construction.* Where floor assemblies are required to be fire-resistance rated by Section 3280.211, the supporting construction of such assemblies shall have an equal or greater fire-resistance rating. (c) Dwelling unit rated penetrations. Penetrations of wall or floor-ceiling assemblies in multi-unit dwellings shall be required to be fire-resistance rated in accordance with this section. (1) Through penetrations. (i) Penetrations shall be installed as tested in the approved fire-resistance-rated assembly; or (ii)Penetrations shall be protected by an approved penetration fire stop system installed as tested in accordance with ASTM E814-13 or UL 1479-2014, with a positive pressure differential of not less than 0.01 inch of water and shall have an F rating of not less than the required fire-resistance rating of the wall or floor-ceiling assembly penetrated; or (iii) Where the penetrating items are steel, ferrous or copper pipes, tubes or conduits, the annular space shall be protected as follows: (1) The material used to fill the annular space shall prevent the passage of flame and hot gases sufficient to ignite cotton waste where subjected to ASTM E119-14 or UL263-2014 time temperature fire conditions under a positive pressure differential of not less than 0.01 inch of water at the location of the penetration for the time period equivalent to the penetration for the time period equivalent to the fire-resistance rating of the construction penetrated.

(2) Membrane penetrations. Membrane penetrations shall comply with3280.211(c)(1). Where walls are required to have a fire-resistance rating, recessed fixtures shall be installed so that the required fire-resistance rating will not be reduced.

Exceptions:

(i) Membrane penetrations of fire-resistance-rated walls, ceiling/floors and partitions by steel electrical boxes provided they do not exceed 16 square inches in area and the aggregate area of the openings through the membrane does not exceed 100 square inches in any 100 square feet of wall area. The annular space between the wall membrane and the box shall not exceed? inch. Such boxes on opposite sides of the wall shall be separated by one of the following:

(1) By a horizontal distance of not less than 24inches where the wall or partition is constructed with individual non communicating stud cavities.

(2) By a horizontal distance of not less than the depth of the wall cavity where the wall cavity is filled with cellulose loose-fill, rockwool or slag mineral wool insulation.

(3) By solid fire blocking in accordance with Section 3280.206

(4) By protecting both boxes with listed putty pads.

(5) By other listed materials and methods.

(ii) Membrane penetrations by listed electrical boxes of any materials provided that the boxes have been tested for use in fire-resistance-rated assemblies and are installed in accordance with the instructions included in the listing. The annular space between the wall membrane and the box shall not exceed? inch unless listed otherwise. Such boxes on opposite sides of the wall shall be separated by one of the following:

(1) By the horizontal distance specified in the listing of the electrical boxes.

(2) By solid fire blocking in accordance with Section 3280.206

(3) By protecting both boxes with listed putty pads.

(4) By other listed materials and methods.

(iii) The annular space created by the penetration of a fire sprinkler provided that it is covered by a metal escutcheon plate.

3280.5 Dataplate

Each ~~manufactured homes~~ dwelling unit shall bear a data plate affixed in a permanent manner near the main electrical panel or other readily accessible and visible location. …

3280.103(b) Whole-house ventilation. Each ~~manufactured home~~ dwelling unit must be provided with whole-house ventilation having a minimum…

3280.105(a) Number and location of exterior doors. ~~Manufactured homes~~ Each dwelling unit shall have a minimum of two exterior doors located remote from each other.

3280.109(a) ~~Every manufactured homes~~ Each dwelling unit shall have at least one living area with not less than 150 sq. ft. of gross floor area.

3280.309 Health Notice on formaldehyde emissions.

(a) Each ~~manufactured home~~ dwelling unit shall have a Health Notice on formaldehyde emissions prominently displayed in a temporary manner in the kitchen…

3280.510 Heat loss certificate

The manufactured home manufacturer shall permanently affix the following "Certificate" to an interior surface of ~~the home~~ each dwelling unit that is readily visible to the occupant ~~homeowner.~~ ...

3280.511 Comfort cooling certificate and information.

(a) The manufactured home manufacturer shall permanently affix a "Comfort Cooling Certificate" to an interior surface of ~~the home~~ each dwelling unit that is readily visible to the occupant ~~homeowner~~. …

3280.609(a)(2) Hot water supply. Each ~~manufactured home~~ dwelling unit equipped with a kitchen sink, and bathtub and/or shower shall be provided with a hot water supply system including a listed water heater.

	3280.705(j) Gas supply connections. When gas appliances are installed, at least one gas supply connection shall be provided on each ~~home~~ dwelling unit. … **3280.802 Definitions.** (20) Feeder assembly means the overhead or under-chassis feeder conductors, including the grounding conductor, together with the necessary fittings and equipment, or a power supply cord approved for manufactured home use, designed for the purpose of delivering energy from the source of electrical supply to the distribution panel board within ~~the manufactured home~~ each dwelling unit. **3280.803 Power supply** (a) The power supply to the manufactured home shall be a feeder assembly consisting of not more than one listed 50 ampere manufactured home power-supply cords, or a permanently installed circuit. A manufactured home that is factory-equipped with gas or oil-fired central heating equipment and cooking appliances shall be permitted to be provided with a listed manufactured home power supply cord rated 40 amperes. This section does not apply to multi-unit dwellings. **3280.804 Disconnecting means and branch-circuit protective equipment.** (c) *Disconnecting means*. A single disconnecting means must be provided in each ~~manufactured home~~ dwelling unit, consisting of a circuit breaker, or a switch and fuses and its accessories, installed in a readily accessible location near the point of entrance of the supply cord or conductors into the ~~manufactured home~~ dwelling unit. … (g) Branch-circuit distribution equipment shall be installed in each ~~manufactured home~~ dwelling unit and shall include overcurrent protection for each branch circuit consisting of either circuit breakers or fuses. ... (h) A service distribution panel shall be factory installed and connected to the subpanels on multi-unit dwellings. **3280.805Branch circuits required.** (a) The number of branch circuits required shall be determined in accordance with the following: (1) Lighting, based on 3 volt-amperes per square foot time outside dimensions of ~~the manufactured home~~ each dwelling unit(coupler excluded) divided by120 volts times amperes to determine number of 15 or 20 ampere lighting area circuits. ... **3280.114 Sound Transmission between Multi-unit dwellings** **(a) Scope.** This section shall apply to common interior walls, partitions and floor/ceiling assemblies between adjacent *dwelling units.* **(b) Air-borne sound.** Walls, partitions and floor/ceiling assemblies between stories separating *dwelling units* from each other shall have a sound transmission class (STC) of not less than 39 for air-borne noise when tested in accordance with ASTM E 90 or calculated. Penetrations or openings in construction assemblies for piping; electrical devices; recessed cabinets; bathtubs; soffits; or heating, ventilating or exhaust ducts shall be sealed, lined, insulated or otherwise treated to maintain the required ratings. This requirement shall not apply to *dwelling unit* entrance doors; however, such doors shall be tight fitting to the frame and sill. **(c)Structure-borne sound.** Floor/ceiling assemblies between stories separating *dwelling units* shall have an impact insulation class (IIC) rating of not less than 39 when tested in accordance with ASTM E 492. *Add new text to 3285 as follows:* **3285.603.XXXWater Connections** Each dwelling unit shall have a separate water connection. **3285.603(c)(1)** An identified and accessible shut off valve must be installed for each dwelling unit between the water supply and the inlet.

Reason:	Proposed change to address the multi-dwelling unit problem, was submitted on behalf of the entire General Subcommittee based off of discussions during the 5-5-2015 General Subcommittee Conference Call.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	
MHCC Action:	Approve as Modified (20-1-0)
MHCC Modification of Proposed Change:	*Revise and Add new text to 3280 as follows:* **3280.2 Definitions.** *Manufactured home* means a structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width or 40 body feet or more in length or which when erected on-site is 320 or more square feet, and which is built on a permanent chassis and designed **to be used as a dwelling** with or without a permanent foundation ... *Dwelling* means any structure that contains one to a maximum of three dwelling units, designed to be occupied for residential living purposes. … *Dwelling unit* means a single unit providing complete independent living facilities for one or more persons, where the occupancy is primarily permanent in nature, including permanent provisions ~~one or more habitable rooms which are designed to be occupied by one family with facilities~~ for separate living, sleeping, cooking, sanitation, and eating… **3280.211 Multi-Unit Dwellings.** (a) In structures with more than one dwelling unit, each dwelling unit shall be separated from each other by wall and floor assemblies having not less than a 1-hour fire-resistance rating when tested in accordance with ASTM E119-14 or UL263-2014 or not less than a 1-hour fire-resistance when calculated in accordance with Chapter 16 of National Design Specification for Wood Construction - 2015. Fire-resistance-rated floor/ceiling and wall assemblies shall extend to and be tight against the exterior wall, and wall assemblies shall extend from the foundation to the underside of the roof sheathing. Exceptions: (1) Wall assemblies need not extend through attic spaces where the ceiling is protected by not less than 5/8 -inch Type X gypsum board, and attic draft stop constructed as specified in Section 3280.212 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-inchgypsum board or equivalent. (b) *Supporting Construction.* Where floor assemblies are required to be fire-resistance rated by Section 3280.211, the supporting construction of such assemblies shall have an equal or greater fire-resistance rating. (c) Dwelling unit rated penetrations. Penetrations of wall or floor-ceiling assemblies in multi-unit dwellings shall be required to be fire-resistance rated in accordance with this section. (1) Through penetrations. (i) Penetrations shall be installed as tested in the approved fire-resistance-rated assembly; or (ii)Penetrations shall be protected by an approved penetration fire stop system installed as tested in accordance with ASTM E814-13 or UL 1479-2014, with a positive pressure differential of not less than 0.01 inch of water and shall have an F rating of not less than the required fire-resistance rating of the wall or floor-ceiling assembly penetrated; or

(iii) Where the penetrating items are steel, ferrous or copper pipes, tubes or conduits, the annular space shall be protected as follows:

(1) The material used to fill the annular space shall prevent the passage of flame and hot gases sufficient to ignite cotton waste where subjected to ASTM E119-14 or UL263-2014 time temperature fire conditions under a positive pressure differential of not less than 0.01 inch of water at the location of the penetration for the time period equivalent to the penetration for the time period equivalent to the fire-resistance rating of the construction penetrated.

(2) Membrane penetrations. Membrane penetrations shall comply with3280.211(c)(1). Where walls are required to have a fire-resistance rating, recessed fixtures shall be installed so that the required fire-resistance rating will not be reduced.

Exceptions:

(i) Membrane penetrations of fire-resistance-rated walls, ceiling/floors and partitions by steel electrical boxes provided they do not exceed 16 square inches in area and the aggregate area of the openings through the membrane does not exceed 100 square inches in any 100 square feet of wall area. The annular space between the wall membrane and the box shall not exceed? inch. Such boxes on opposite sides of the wall shall be separated by one of the following:

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(2) By a horizontal distance of not less than the depth of the wall cavity where the wall cavity is filled with cellulose loose-fill, rockwool or slag mineral wool insulation.

(3) By solid fire blocking in accordance with Section 3280.206

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(ii) Membrane penetrations by listed electrical boxes of any materials provided that the boxes have been tested for use in fire-resistance-rated assemblies and are installed in accordance with the instructions included in the listing. The annular space between the wall membrane and the box shall not exceed? inch unless listed otherwise. Such boxes on opposite sides of the wall shall be separated by one of the following:

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	The manufactured home manufacturer shall permanently affix the following "Certificate" to an interior surface of ~~the home~~ each dwelling unit that is readily visible to the occupant ~~homeowner.~~ ... **3280.511 Comfort cooling certificate and information.** (a) The manufactured home manufacturer shall permanently affix a "Comfort Cooling Certificate" to an interior surface of ~~the home~~ each dwelling unit that is readily visible to the occupant ~~homeowner~~. … **3280.609(a)(2) Hot water supply.** Each ~~manufactured home~~ dwelling unit equipped with a kitchen sink, and bathtub and/or shower shall be provided with a hot water supply system including a listed water heater. **3280.705(j) Gas supply connections.** When gas appliances are installed, at least one gas supply connection shall be provided on each ~~home~~ dwelling unit. … **3280.802 Definitions.** (20) Feeder assembly means the overhead or under-chassis feeder conductors, including the grounding conductor, together with the necessary fittings and equipment, or a power supply cord approved for manufactured home use, designed for the purpose of delivering energy from the source of electrical supply to the distribution panel board within ~~the manufactured home~~ each dwelling unit. **3280.803 Power supply** (a) The power supply to the manufactured home shall be a feeder assembly consisting of not more than one listed 50 ampere manufactured home power-supply cords, or a permanently installed circuit. A manufactured home that is factory-equipped with gas or oil-fired central heating equipment and cooking appliances shall be permitted to be provided with a listed manufactured home power supply cord rated 40 amperes. This section does not apply to multi-unit dwellings. **3280.804 Disconnecting means and branch-circuit protective equipment.** (c) *Disconnecting means*. A single disconnecting means must be provided in each ~~manufactured home~~ dwelling unit, consisting of a circuit breaker, or a switch and fuses and its accessories, installed in a readily accessible location near the point of entrance of the supply cord or conductors into the ~~manufactured home~~ dwelling unit. … (g) Branch-circuit distribution equipment shall be installed in each ~~manufactured home~~ dwelling unit and shall include overcurrent protection for each branch circuit consisting of either circuit breakers or fuses. ... (h) A service distribution panel shall be factory installed and connected to the subpanels on multi-unit dwellings. **3280.805Branch circuits required.** (a) The number of branch circuits required shall be determined in accordance with the following: (1) Lighting, based on 3 volt-amperes per square foot time outside dimensions of ~~the manufactured home~~ each dwelling unit(coupler excluded) divided by120 volts times amperes to determine number of 15 or 20 ampere lighting area circuits. ... **3280.114 Sound Transmission between Multi-unit dwellings** **(a) Scope.** This section shall apply to common interior walls, partitions and floor/ceiling assemblies between adjacent *dwelling units.* **(b) Air-borne sound.** Walls, partitions and floor/ceiling assemblies between stories separating *dwelling units* from each other shall have a sound transmission class (STC) of not less than ~~39~~ 34 for air-borne noise when tested in accordance with ASTM E 90 or calculated. Penetrations or openings in construction assemblies for piping; electrical devices; recessed cabinets; bathtubs; soffits; or heating, ventilating or exhaust ducts shall be sealed, lined, insulated or otherwise treated to maintain the required ratings. This requirement shall not apply to *dwelling unit* entrance doors; however, such doors shall be tight fitting to the frame and sill.

	(c)Structure-borne sound. Floor/ceiling assemblies between stories separating *dwelling units* shall have an impact insulation class (IIC) rating of not less than ~~39~~ 34 when tested in accordance with ASTM E 492. *Add new text to 3285 as follows:* **3285.603.XXXWater Connections** Each dwelling unit shall have a separate water connection. **3285.603(c)(1)** An identified and accessible shut off valve must be installed for each dwelling unit between the water supply and the inlet.
MHCC Reason:	STC of 34 is a more attainable requirement.
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Approve as Modified.

Log # 129 - § 3280.4 Incorporation by reference.	Date: 7/29/2015
Submitter:	Structure and Design Subcommittee - Dave Tompos
Requested Action:	Revise Text
Proposed Change:	**§3280.4 Incorporation by reference.** (e) American Forest and Paper Association (AFPA), 1111 Nineteenth Street, Suite 800, Washington, DC 20036 (previously named National Forest Products Association (NFPA), telephone number 1-800-878-8878, Web site:*http://www.afandpa.org.* (1) AFPA, Design Values for Joists and Rafters 1992, IBR approved for §3280.304(b). (2) AFPA PS-20-70, Span Tables for Joists and Rafters, 1993, IBR approved for §3280.304(b). (3) ANSI/~~AFPA~~AWC NDS-~~2001~~2015, National Design Specifications for Wood Construction, ~~2001~~2015 Edition, with Supplement~~,~~: Design Values for Wood Construction, November ~~30, 2001~~2014, IBR approved for §3280.304(b). **§3280.304 Materials.** **Wood and Wood Products** National Design Specifications for Wood Construction, ~~2001~~2015 Edition, with Supplement~~,~~: Design Values for Wood Construction, ~~NDS-2001, ANSI/AFPA~~ ANSI/AWC NDS-2015.
Reason:	Resolution to Action Item 3: Southern Yellow Pine Letter. Was submitted on behalf of the entire Structure and Design Subcommittee based off of discussions during the 7-15-2015 Structure and Design Subcommittee teleconference.
Substantiating Documents:	No
Additional Cost:	Unknown
Cost Benefit Explanation:	Unknown
Subcommittee Recommendation:	
MHCC Action:	Approve (21-0-0)
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	MHCC Final Action Submitted to HUD
Log History:	**12/4/2015** – Final Action from August 18-20, 2014 meeting confirmed by MHCC Ballot III. **8/18/2015** – MHCC Motion: Approve.

Log # 130 - § 3280.105(a)(2)(i) Exit facilities; exterior doors	Date: 8/4/2015
Submitter:	John Weldy
Requested Action:	Delete Text
Proposed Change:	Propose deletion of complete paragraph 3280.105(a)(2)(i): ~~**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.~~
Reason:	At the time the MHCSS was written, dwelling floor plans consisted of rooms normally well defined by walls. However, in today's market, families desire more open floor plans so that the whole family can be together no matter which room they're using. The housing market demands open floor plans with rooms which are not defined by walls. 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. Homeowners do not want these stub wall obstructions in their homes which provide no advantage in fire safety. Furthermore, the current language increases liability since room division is not defined within 3280 and therefore the 6" wall segment which is currently accepted by interpretation of this section is subject to legal dispute. Substantiation: An interior wall as defined within MHCSS and as interpreted by monitoring agency does not improve fire safety. Furthermore, the International Residential Code (IRC) as adopted by nearly all States does not require two egress doors, but rather only requires a single egress door: 2015 IRC R311. Egress Door. Not less than one egress door shall be provide for each dwelling unit. In addition, the International Building Code (IBC) as adopted by States for commercial buildings requires only one egress door in residential buildings such as hotels and apartments when the occupant load is equal or less than ten occupants. (see 2015 IBC Table 1015.1 and section 1015.1). The requirement for two egress doors to be remote from each other by a prescribed minimum distance as required within 3280.105 provides the key fire safety provisions to ensure readily accessible egress. Therefore, the requirement for the doors to be located in separate rooms should be eliminated.
Substantiating Documents:	Yes
Additional Cost:	No
Cost Benefit Explanation:	There will be no cost benefit or cost increase associated with the proposed code revision.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat
Log History:	

Log # 131 - § 3280.305(k)(2) Structural Design Requirements	Date: 12/9/2015
Submitter:	John Weldy
Requested Action:	New Text
Proposed Change:	Add the following after **3280.305(k)(2):** (i) Attic area as used within this section are those spaces where the maximum clear height between joist and rafters is 42" or greater or where there are two or more adjacent trusses with web configurations capable of accommodating an assumed rectangle 42" high by 24" in width, or greater, within the plan of the trusses. The live load need only be applied to those portions of the joist or truss bottom chords where all of the following conditions are met: 1. The attic area is accessible from an opening not less than 20 inches in width and30 inches in length that is located where the clear height in the attic is a minimum of 30 inches. 2. The slope of the joists or truss bottom chords are no greater than 2 inches vertical to 12 inches horizontal. 3. Required insulation depth is less than the joist or truss bottom chord member depth.
Reason:	Statement of Problem: Final rule Section 3280.305(k) introduces an undefined "Attic area" term. In absence of a definition for attic area, it is unclear in 3280.305(k) when an attic live load shall be applied in accordance with the section. Clarification is needed to explain when a roof configuration creates an "attic area" as well as how the load is to be applied to the truss. Substantiation: Proposal adds standard definition for attic space as provided within the 2015 International Residential Code (IRC) R301.5. Borrowing proposed language from national recognized residential building code will eliminate confusion and allow standard computer truss modeling methodologies to be utilized to design trusses.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Will result in a cost reduction by limiting truss which must be designed for attic live load under section 3280.305k to those in which use for attic storage is practical.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat.
Log History:	

Log # 132 - § 3285.2 Manufacturer Installation Instructions	Date: 12/9/2015
Submitter:	Lois Starkey
Requested Action:	Revised Text
Proposed Change:	**24 CFR Part 3285.2 Manufacturer Installation Instructions** **c)** ***Variations to installation instructions.*** **(ii)** If designs and instructions are not available from the manufacturer, obtain an alternate design prepared and certified by a registered professional engineer or registered architect for the support and anchorage of the manufactured home that is consistent with the manufactured home design, and conforms to the requirements of the MHCSS.~~and has been approved by the manufacturer and the DAPIA~~
Reason:	The recommended change eliminates redundant approvals by the DAPIA. The proposal retains existing language which ensures that the alternative foundations are designed and certified by a registered professional engineer or architect. This proposal does not change the requirement that a registered professional engineer or architect must prepare and certify an alternative foundation system which is consistent with the manufactured home design and which meets the HUD -Code. This change recognizes that local code offices are appropriately responsible for ensuring compliance with local site requirements, including requirements for foundations.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	The proposal will have minimal cost impact. In fact it is likely to reduce costs to homebuyers by eliminating one layer of approvals.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat.
Log History:	

Log # 133 - § 3280.2 Reference Standards	Date: 12/9/2015
Submitter:	Lois Starkey
Requested Action:	New Text
Proposed Change:	3280.4 Incorporation by Reference *(a) Materials, devices, fixtures, fittings, equipment, appliances, appurtenances and accessories shall conform to one of the reference standards in this section. Where an appropriate standard is not otherwise indicated in this section or if a standard that is not indicated in this section is preferred, the item may be used if it is listed or certified.* ~~(a)~~ *(b)* The specifications, standards, and codes of the following…
Reason:	This recommended change will provide for the utilization of components and materials that may not be specifically referenced. This section mirrors language in section 3280.604(a). The proposed change will allow new products and materials to be incorporated into the design and construction of manufactured homes, which are available in the marketplace, but are not referenced in the HUD-Code due to the lengthy federal rulemaking process.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	This proposal will have no cost impact, and will benefit homebuyers by making products available for use in the construction of manufactured homes. It will reduces design and construction costs by eliminating the need to seek approval through the Alternative Construction process.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat.
Log History:	

Log # 134 - § 3280.304(b)(1) Materials	Date: 12/15/2015
Submitter:	David Tompos
Requested Action:	Revised Text
Proposed Change:	Specification for Structural Steel Buildings - ~~Allowable Stress Design and Plastic Design -- AISC S335, 1989.~~ ANSI/AISC 360-10. ~~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.~~
Reason:	Update of reference standard to the latest version. The parts that are listed as not applicable in the current language do not exist in the AISC S335-1989. They correspond to an earlier edition. The current version can be viewed here: https://www.aisc.org/WorkArea/showcontent.aspx?id=41132
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	No additional cost is expected.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat.
Log History:	

Log # 135 - § 3285.603 Water supply		Date: 12/18/2015
Submitter:	Debra Blake	
Requested Action:	Revised Text	
Proposed Change:	**§3285.603 Water supply.** (e) *Testing procedures.* (1) The water system must be inspected and tested for leaks after completion at the site. The installation instructions must provide testing requirements that are ~~consistent with § 3280.612 of this chapter.~~ In accordance with the piping manufacturer's instructions	
Reason:	This change is needed because certain piping materials are not made to be tested by subjecting the system to air at 100 psi for 15 minutes without loss of pressure. CVPC materials, in particular, could be damaged or explode by this force of air. Piping manufacturers provide pressure test instructions that are different than the HUD-Code requirements in 3280.612 as referenced in the current 3285.603 language.	
Substantiating Documents:	Yes	
Additional Cost:	No	
Cost Benefit Explanation:	The proposed testing method change adds no additional cost.	
Subcommittee Recommendation:		
MHCC Action:		
MHCC Modification of Proposed Change:		
MHCC Reason:		
Current Status:	Received by Secretariat.	
Log History:		

Log # 136 - § 3286.205 (d) Prerequisites for installation license	Date: 12/21/2015
Submitter:	Michael Henretty
Requested Action:	Revised Text
Proposed Change:	**(d)** ***Surety bond or irrevocable letter of credit and insurance.*** An applicant for an installation license must provide evidence of and must maintain, when available in the state of installation, a surety bond or irrevocable letter of credit and insurance that will cover the cost of repairing all damage to the home and its supports caused by the installer during the installation up to and including replacement of the home. HUD may require the licensed installer to provide proof of the surety bond and insurance at any time. The licensed installer must notify HUD of any changes or cancellations with the surety bond, irrevocable letter of credit or insurance coverage.
Reason:	These changes are to codify what has been discovered by the HUD-Administered Manufactured Home Installation Program as necessary to provide adequate coverage to consumers in the case of damage to or loss of a manufactured home from installation defects. The current regulations require a surety bond or insurance, suggesting that having one or the other would provide adequate coverage for damage(s). However, it has been found that neither alone is sufficient and that a combination of coverage is required to meet the intent of the law. See further explanation below. The intent of the law is to cover damages to the home up to the total value of the home, in addition to covering small damages and workmanship related issues from installation defects. This should be done at no cost to the consumers. In order to fulfill this intent with insurance-only, the insurance policy would need to cover small damages and workmanship-related issues (that are the fault of the installer) with no deductible. There is no commonly available insurance policy that fulfills the requirement to cover workmanship issues. In fact, most general liability insurance policies in the industry exclude workmanship-related issues. While it is possible to purchase an insurance policy with a zero-dollar deductible, the cost is very high. Therefor it is not realistic for an installer or company to only hold such an insurance policy. In order to fulfill this intent with a surety bond-only, the bond would need to be large enough to cover total home replacement, approximately $100,000 to $150,000. However, a bond that size may not be obtainable by many installers or companies due to policy cost and strict financial reporting requirements from the bonding company. The larger the bond, the higher the cost and requirements to obtain the policy. Therefore it is not realistic for an installer or business to hold a significantly large surety bond sufficient to cover the total replacement of a home. Based on this assessment, it has been determined that for an installer to be able to cover both workmanship issues and the total loss of a home they must hold (1) a general liability insurance policy and (2) a surety bond or irrevocable letter of credit. A general liability policy will cover the full replacement value if the home is destroyed. A surety bond or irrevocable letter of credit will cover small damages and workmanship-related issues. An irrevocable letter of credit was added as an option in place of the surety bond because a letter of credit is often used in the construction industry in place of a surety bond. An irrevocable letter of credit will afford the same coverage as a surety bond to the consumer and give installers another avenue to meet the requirements at the most affordable price possible. A cash bond was explored as an option, however, after evaluating the security issues and administrative cost of a cash bonds, this option was dismissed. In addition to providing adequate coverage for workmanship or total loss of the home, the combination option is easy and cost effective for installers or businesses to obtain. Most manufactured home installers or companies already carry a general liability insurance policy. This policy is sufficient once HUD's Office of Manufactured Housing Programs is added as an additional insured party. This will also ensure that HUD is updated when or if a policy is out of force, so action can be taken per 3286.209(vi). Therefore, installers or businesses only need to obtain the surety bond or irrevocable letter of credit to meet program requirements. At present, we do not wish to codify the monetary requirements of the insurance policy, bond or irrevocable letter of credit. The program will set limits that can then be updated by HUD as deems appropriate or necessary. All Bonds and irrevocable letters of credit are required to be able to be drawn upon for one year past the expiration or cancellation of the license.

Substantiating Documents:	No
Additional Cost:	Yes
Cost Benefit Explanation:	Based on policies received, the additional cost of the bond is approximately $100 - $200 per year. Nation-wide coverage is available and posted on the installation website. The costs for irrevocable letters of credit vary greatly based mostly on the installers or businesses relationship with a bank. From the banks surveyed, the average cost range is $0 - $500 annually. In some cases banks required a deposit that matched the amount of the irrevocable letter of credit.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat.
Log History:	

Log # 137 - § 3286.207 (d) Process for obtaining installation license	Date: 12/21/2015
Submitter:	Michael Henretty
Requested Action:	Revised Text
Proposed Change:	**(d)** ***Proof of surety bond or irrevocable letter of credit and insurance.*** Every applicant for an installation license must submit the name and proof of the applicant's surety bond or irrevocable letter of credit and insurance carrier and the number of the policy required in § 3286.205(d).
Reason:	These changes are to codify what has been discovered by the HUD-Administered Manufactured Home Installation Program as necessary to provide adequate coverage to consumers in the case of damage to or loss of a manufactured home from installation defects. The current regulations require a surety bond or insurance, suggesting that having one or the other would provide adequate coverage for damage(s). However, it has been found that neither alone is sufficient and that a combination of coverage is required to meet the intent of the law. See further explanation below. The intent of the law is to cover damages to the home up to the total value of the home, in addition to covering small damages and workmanship related issues from installation defects. This should be done at no cost to the consumers. In order to fulfill this intent with insurance-only, the insurance policy would need to cover small damages and workmanship-related issues (that are the fault of the installer) with no deductible. There is no commonly available insurance policy that fulfills the requirement to cover workmanship issues. In fact, most general liability insurance policies in the industry exclude workmanship-related issues. While it is possible to purchase an insurance policy with a zero-dollar deductible, the cost is very high. Therefor it is not realistic for an installer or company to only hold such an insurance policy. In order to fulfill this intent with a surety bond-only, the bond would need to be large enough to cover total home replacement, approximately $100,000 to $150,000. However, a bond that size may not be obtainable by many installers or companies due to policy cost and strict financial reporting requirements from the bonding company. The larger the bond, the higher the cost and requirements to obtain the policy. Therefore it is not realistic for an installer or business to hold a significantly large surety bond sufficient to cover the total replacement of a home. Based on this assessment, it has been determined that for an installer to be able to cover both workmanship issues and the total loss of a home they must hold (1) a general liability insurance policy and (2) a surety bond or irrevocable letter of credit. A general liability policy will cover the full replacement value if the home is destroyed. A surety bond or irrevocable letter of credit will cover small damages and workmanship-related issues. An irrevocable letter of credit was added as an option in place of the surety bond because a letter of credit is often used in the construction industry in place of a surety bond. An irrevocable letter of credit will afford the same coverage as a surety bond to the consumer and give installers another avenue to meet the requirements at the most affordable price possible. A cash bond was explored as an option, however, after evaluating the security issues and administrative cost of a cash bonds, this option was dismissed. In addition to providing adequate coverage for workmanship or total loss of the home, the combination option is easy and cost effective for installers or businesses to obtain. Most manufactured home installers or companies already carry a general liability insurance policy. This policy is sufficient once HUD's Office of Manufactured Housing Programs is added as an additional insured party. This will also ensure that HUD is updated when or if a policy is out of force, so action can be taken per 3286.209(vi). Therefore, installers or businesses only need to obtain the surety bond or irrevocable letter of credit to meet program requirements. At present, we do not wish to codify the monetary requirements of the insurance policy, bond or irrevocable letter of credit. The program will set limits that can then be updated by HUD as deems appropriate or necessary. All Bonds and irrevocable letters of credit are required to be able to be drawn upon for one year past the expiration or cancellation of the license.
Substantiating Documents:	No
Additional Cost:	Yes

Cost Benefit Explanation:	Based on policies received, the additional cost of the bond is approximately $100 - $200 per year. Nation-wide coverage is available and posted on the installation website. The costs for irrevocable letters of credit vary greatly based mostly on the installers or businesses relationship with a bank. From the banks surveyed, the average cost range is $0 - $500 annually. In some cases banks required a deposit that matched the amount of the irrevocable letter of credit.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat.
Log History:	

Log # 138 - § 3286.209 (8) (vi) Denial, suspension, or revocation of installation license	Date: 12/21/2015
Submitter:	Michael Henretty
Requested Action:	Revised Text
Proposed Change:	**(vi)** Failure to maintain the surety bond or irrevocable letter of credit and insurance required by § 3286.205(d).
Reason:	These changes are to codify what has been discovered by the HUD-Administered Manufactured Home Installation Program as necessary to provide adequate coverage to consumers in the case of damage to or loss of a manufactured home from installation defects. The current regulations require a surety bond or insurance, suggesting that having one or the other would provide adequate coverage for damage(s). However, it has been found that neither alone is sufficient and that a combination of coverage is required to meet the intent of the law. See further explanation below. The intent of the law is to cover damages to the home up to the total value of the home, in addition to covering small damages and workmanship related issues from installation defects. This should be done at no cost to the consumers. In order to fulfill this intent with insurance-only, the insurance policy would need to cover small damages and workmanship-related issues (that are the fault of the installer) with no deductible. There is no commonly available insurance policy that fulfills the requirement to cover workmanship issues. In fact, most general liability insurance policies in the industry exclude workmanship-related issues. While it is possible to purchase an insurance policy with a zero-dollar deductible, the cost is very high. Therefor it is not realistic for an installer or company to only hold such an insurance policy. In order to fulfill this intent with a surety bond-only, the bond would need to be large enough to cover total home replacement, approximately $100,000 to $150,000. However, a bond that size may not be obtainable by many installers or companies due to policy cost and strict financial reporting requirements from the bonding company. The larger the bond, the higher the cost and requirements to obtain the policy. Therefore it is not realistic for an installer or business to hold a significantly large surety bond sufficient to cover the total replacement of a home. Based on this assessment, it has been determined that for an installer to be able to cover both workmanship issues and the total loss of a home they must hold (1) a general liability insurance policy and (2) a surety bond or irrevocable letter of credit. A general liability policy will cover the full replacement value if the home is destroyed. A surety bond or irrevocable letter of credit will cover small damages and workmanship-related issues. An irrevocable letter of credit was added as an option in place of the surety bond because a letter of credit is often used in the construction industry in place of a surety bond. An irrevocable letter of credit will afford the same coverage as a surety bond to the consumer and give installers another avenue to meet the requirements at the most affordable price possible. A cash bond was explored as an option, however, after evaluating the security issues and administrative cost of a cash bonds, this option was dismissed. In addition to providing adequate coverage for workmanship or total loss of the home, the combination option is easy and cost effective for installers or businesses to obtain. Most manufactured home installers or companies already carry a general liability insurance policy. This policy is sufficient once HUD's Office of Manufactured Housing Programs is added as an additional insured party. This will also ensure that HUD is updated when or if a policy is out of force, so action can be taken per 3286.209(vi). Therefore, installers or businesses only need to obtain the surety bond or irrevocable letter of credit to meet program requirements. At present, we do not wish to codify the monetary requirements of the insurance policy, bond or irrevocable letter of credit. The program will set limits that can then be updated by HUD as deems appropriate or necessary. All Bonds and irrevocable letters of credit are required to be able to be drawn upon for one year past the expiration or cancellation of the license.
Substantiating Documents:	No
Additional Cost:	Yes
Cost Benefit Explanation:	Based on policies received, the additional cost of the bond is approximately $100 - $200 per year. Nation-wide coverage is available and posted on the installation website. The costs for irrevocable letters of credit vary greatly based mostly on the installers or

	businesses relationship with a bank. From the banks surveyed, the average cost range is $0 - $500 annually. In some cases banks required a deposit that matched the amount of the irrevocable letter of credit.
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat.
Log History:	

Log # 139 - § 3280.4 Reference Standards						Date: 01/08/2016
Submitter:	Lois Starkey					
Requested Action:	Revised Text					
Proposed Change:	Standard	New/ Update	Current Year	Latest Year	Title	CFR
	AFPA PS-20-70	U	2005	2012	Span Tables for Joists & Rafters	
	AISI-S100	N	2007	2012	North American Specification for the Design of cold-formed Steel Structural Members	3280.304 (b)(1)
	ANSI A208.1	U	2009	2009	Particleboard	3280.304 (b)(1)
	ANSI Z21.5.1	U	2006	2015	Gas Clothes Dryers Vol 1., Type 1 Clothes Dryers	3280.703
	ANSI Z21.40.1	U	1996	1996	Gas Fired Absorption Summer Air Conditioning Appliances	3280.703
	ANSI Z21.1	U	2005	2014	Household Cooking Gas Appliances	3280.703
	ANSI Z21.19	U	2002	2014	Refrigerators Using Gas Fuel	3280.703
	ANSI Z21.10.1	U	2004	2014	Gas Water Heaters Vol.1, Storage Water Heaters With Input Ratings of 75,000 BTU per hour of less	3280.703
	ANSI Z21.10.3	U	2004	2014	Gas Fired Water Heaters Vol III, Storage Water Heaters with Input Ratings Above 75,000 BTU per Hour, Circulating and Instantaneous	3280.703
	ANSI Z21.24	U	2002	2006	Metal Connectors for Gas Appliances	3280.703
	ANSI Z21.15	U	1997	2009	Manually Operated Gas Valves for Appliances, appliance Connector Valves and Hose End Valves	3280.703
	ANSI Z21.20	U	2007	2014	Automatic Gas Ignitions Systems and Components	3280.703
	ANSI Z21.21	U	2005	2012	Automatic Valves for Gas Appliances	3280.703
	ANSI Z21.23	U	2000	2000	Gas Appliance Thermostats, with 2003 and 2005 Addendums	3280.703
	ANSI/ASME B1.20.1	U	2001	2013	Pipe Threads, General Purpose (inch)	3280.304 (b)(1)

ANSI/ASME B36.10M	U	2001	2004	Welding and Seamless Wrought Steel Pipe	3280.304 (b)(1)
ANSI Z21.75/CSA 6.27	N	2001	2007	CSA Standard for Connectors for Outdoor Gas Appliances and Manufactured Homes	3280.703
ANSI/HPVA HP-1-09 American National Standard for Hardwood and Decorative Plywood	U	2004	2009	Hardwood and Decorative Plywood	3280.304 (b)(1)
APA E30-P	N	2007	2011	Engineered Wood Construction Guide	3280.304 (b)(1)
APA D510B	N	2007	2012	Panel Design Specification	3280.304 (b)(1)
APA S812	U	1998	2013	Design and Fabrication of Glued Plywood-Lumber Beams, Supp. 2	3280.304 (b)(1)
APA S811N	N	1995	2012	Design and Fabrication of Plywood Curved Panels, Supp. 1	3280.304 (b)(1)
ASTM D4442	U	2007	2007	Standard test Methods for Direct Moisture Content Measurement of Wood and Wood Base Materials	3280.304 (b)(1)
ASTM D4444	U	2008	2013	Standard Test Methods for Use and Calibration of Hand-Held Moisture Meters	3280.304 (b)(1)
ASTM C1396/C1396M-14	N	2006	2014	Standard Specification for Gypsum Board	3280.304 (b)(1)
ASTM A53/A53M-12	U	2007	2012	Standard Specification for Pipe, Steel, Black and Hot-Dipped, Zinc Coated, Welded and Seamless	3280.703
ASTM B88	U	2003	2014	Standard Specification for Seamless Copper Water Tube	3280.703
ASTM B280	U	2008	2013	Standard Specification for Seamless Copper Tube for Air Conditioning and Refrigeration Field Service	3280.703

ASTM B251	U	2002	2010	Standard Specification for General Requirements for Wrought Seamless Copper-Alloy Tubes	3280.703
ASTM B42	U	2002	2010	Standard Specification for Seamless Copper Pipe, Standard Sizes	3280.703
ASTM E119	U		2014	Standard Test Method for Fire Tests of Building construction and Materials	3280.304 (b)(1)
IAPMO TSC 9-97	U	1997	2003	Standard for Gas Supply Connectors for Manufactured Homes	3280.703
ANSI LC 1	U	2005	2014	Gas Piping Systems Using Corrugated Stainless Steel Tubing	3280.304 (b)(1)
NFPA 31	U	2006	2011	Installation of Oil-Burning Equipment	3280.703
NFPA 720		2009	2015	Standard for the Installation of Carbon Monoxide Detection Equipment	3280.304 (b)(1)
NFPA 58	U	2008	2014	Standard for the Storage and Handling of Liquefied Petroleum Gases	3280.703
PS 1-09	N	2007	2009	Structural Plywood	3280.304 (b)(1)
SAE J533b	U	2007	2007	Flares for Tubing	3280.703
TPI 1	N	2007	2007	National Design Standard for Metal Plate Connected Wood Truss Construction	3280.304 (b)(1)
UL 307A	U	2009	2009	Liquid Fuel-Burning Heating Appliances for Manufactured Homes & Recreational Vehicles	3280.703
UL 1042	U	1994	2009	Electric Baseboard Heating Equipment	3280.703
UL 307B	U	2006	2006	Gas Burning Heating Appliances for Mobil Homes & Recreational Vehicles	3280.703
UL 174	U	2004	2004	Household Electric Storage Tanks Water Heaters	3280.703
UL 181	U	2005	2013	Factory Made Air Ducts & Connectors	3280.703

	UL 181A	U		2013	Closure Systems for Use with Rigid Air Ducts and Air Connectors	3280.703
	UL 109	U	2004	1997	Tube Fittings for Flammable and Combustible Fluids, Refrigeration Service, and Marine Use	3280.703
	UL 569	U	2000	2013	Pigtails & Flexible Hose Connectors for LP Gas	3280.703
	UL 441	U	1996	2010	Gas Vents	3280.703
	UL 103	U	2003	2010	Chimneys, Factory Built Residential Type & Building Heating Appliance	3280.703
	UL 2034	U	2005	2008	Standard for Single and Multiple Station Carbon Monoxide Alarms	3280.304 (b)(1)
	APA U813M	N		2012	Design & Fabrication of Plywood-Stressed Skin Panels	3280.304 (b)(1)
	APA U814J	N		2012	Design & Fabrication of Plywood Sandwich Panels	3280.304 (b)(1)
	APA Y510	N		1997	Plywood Design	3280.304 (b)(1)

Reason:	These are new or updated reference standards, that are currently in use by the industry, and have minimal or no cost impact.
Substantiating Documents:	No
Additional Cost:	No
Cost Benefit Explanation:	Minimal or no cost impact
Subcommittee Recommendation:	
MHCC Action:	
MHCC Modification of Proposed Change:	
MHCC Reason:	
Current Status:	Received by Secretariat.
Log History:	