



## MANUFACTURED HOUSING CONSENSUS COMMITTEE

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**To:** MHCC

**From:** Kevin Kauffman, AO  
Home Innovation Research Labs, 400 Prince George's Blvd, Upper Marlboro, MD 20774

**Date:** December 20, 2016

**Subject:** Circulation of Final Results of MHCC Letter Ballot V – Actions as taken at October 25-27, 2016 MHCC Meeting

Below are the final results from the letter ballot of actions as taken at the October 25-27, 2016 MHCC meeting which took place in Washington D.C.

[Ballot V – Actions as taken at October 25-27, 2016 MHCC meeting](#)

**20 Members Eligible to Vote**

**19 Ballots Returned**

**1 Ballot Not Returned – Garold Miller**

The number of votes required to pass an item with a 2/3rds majority is based on number of ballots returned minus the number of abstentions. All items on this ballot received at least the required number of affirmative votes, thus all items passed.

The final voting results are summarized in the table below.

Ballot Item No.	Log No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
V-1	80	3280.406	Disapprove	19	0	0
V-2	113	3280.4(b)(1)	Approve	19	0	0
V-3	114	3280.4(i)(20)	Approve	19	0	0
V-4	119	3280.508(b)	Disapprove	19	0	0
V-5	120	3280.508(b)	Disapprove	19	0	0
V-6	121	3280.508(d)	Disapprove	19	0	0

Ballot Item No.	Log No.	Section	MHCC Meeting Action	Affirm	Negative	Abstain
V-7	122	3280.511(a)(1)	Disapprove	19	0	0
V-8	135	3285.603	Approve	19	0	0
V-9	140	3280.403, 3280.404, 3280.405	Approve	17	2	0
V-10	141	3286.409	Approve	19	0	0
V-11	142	3286.103	Approve as Modified	19	0	0
V-12	143	3280.711	Approve	17	2	0
V-13	144	3280.304(b)(1)	Approve as Modified	19	0	0
V-14	145	3280.5(i)	Approve	19	0	0

Ballot Item No.	Description of MHCC Motion	Affirm	Negative	Abstain
V-15	Motion to recommend that HUD adopt the NFPA 70-2014 as a reference standard with modifications. <b>(See Appendix A below)</b>	19	0	0
V-16	Motion to approve the Working Draft proposed by HUD regarding the Formaldehyde Emission Controls for Certain Wood Products including a list of questions for publication with the rule-making for comments. <b>(See Appendix B below)</b>	18	1	0

All comments received are organized by Log Number and can be seen below.

### Ballot Item V-4: Log 119 - Section 3280.508(b)

#### MHCC Meeting Action - Disapprove (19 Affirm, 0 Negative, and 0 Abstain)

#### Comment(s) Received – 1

##### Affirmative – 1

**Timothy O’Leary** - Language must include edition dates instead of blanket “latest edition” language.

##### Negative – 0

##### Abstain – 0

## Ballot Item V-5: Log 120 - Section 3280.508(b)

### MHCC Meeting Action - Disapprove (19 Affirm, 0 Negative, and 0 Abstain)

#### Comment(s) Received – 1

##### Affirmative – 1

**Timothy O’Leary** - Agree with ACCA Manual J and ASHRAE Handbook of Fundamentals but edition dates need to be included as part of the language.

##### Negative – 0

##### Abstain – 0

## Ballot Item V-9: Log 140 - Section 3280.403, 3280.404, 3280.405

#### Comment(s) Received – 2

##### Affirmative – 0

##### Negative – 2

**Debra Blake** - I will change my vote to “No” based on information now available but not available at the time the Log was presented to the Committee and a request that Log 140 be brought before the MHCC again to include the new information in the attached response for reconsideration by the Committee.

**William Freeborne** - Please change my vote on log 140 to a negative. This is to allow the committee to acknowledge the existence of the AAMA standards 1701,1702, and 1704 cited in Robert J Luter's letter.

##### Abstain – 0

## Ballot Item V-12: Log 143 - Section 3280.711

### MHCC Meeting Action - Approve (17 Affirm, 2 Negative, and 0 Abstain)

#### Comment(s) Received – 2

##### Affirmative – 0

##### Negative – 2

**Timothy O’Leary** - I will restate my reasons for Disagreeing with this log item. Many of our demographic are digitally illiterate. Until such time as this changes, I am against supplying only a QRC on the appliance. Owner Manuals should have a hard copy and a hard copy should be attached to the appliance. Quick Response Code is fine as a supplemental. Will manufacturer savings due to reduction in printing be reflected in the cost of the home or will this be merely a windfall for the manufacturers? Manufacturers and their lobbyists made a big deal about the cost savings this would provide for them but no mention was made regarding any cost reduction to the consumer. Cost savings should be identified on a unit by unit basis as industry wide cost savings and individual plant savings mean nothing to the individual consumer.

**Joseph Sadler** - As an agency whose mission is to protect the consumer, it is important to provide all the information for appliances to the consumer. Many purchasers do not have access to a computer or the internet and this is a burden placed on the consumer.

## **Abstain – 0**

Ballot Item V-15: Motion to recommend that HUD adopt the NFPA 70-2014 as a reference standard with modifications.

**MHCC Meeting Action - 0 (19 Affirm, 0 Negative, and 0 Abstain)**

**Comment(s) Received – 2**

### **Affirmative – 2**

**James Demitrus** - Since 1911 the National Electric Code has been the national authority for electrical safety and property protection. In 1999, 18 years ago, the Code required arc-fault protection in bedrooms and their further use was expanded to all areas of the home in 2014. This year the MHCC proposes protecting bedrooms almost two decades after they were first available in the late 1990's.

Change does not come easy, the benefits of any initiative are lost to funding discussions. We need a clearer set of housing goals and a method of funding. Otherwise it is an unfunded mandate for home builders to the detriment of the consumer.

**Joseph Sadler** - It may have been the intent in using the term "General Lighting Circuit" to exclude the small appliance circuit and laundry circuit, however, there is not a definition for "General Lighting Circuit(s)" in the NEC or 3280. In the NEC only General Branch Circuits are defined which may include lighting and appliances. A definition of "General Lighting Circuit(s)" should be added to 3280 for clarity of what specifically must be protected by an AFCI as intended by the Committee to prevent confusion.

### **Negative – 0**

### **Abstain – 0**

Ballot Item V-16: Motion to approve the Working Draft proposed by HUD regarding the Formaldehyde Emission Controls for Certain Wood Products including a list of questions for publication with the rule-making for comments.

**MHCC Meeting Action - 0 (18 Affirm, 1 Negative, and 0 Abstain)**

**Comment(s) Received – 2**

### **Affirmative – 1**

**James Demitrus** - Without regular & accurate inspections, what guarantee is there that imported wood products have the quality control to assure that formaldehyde levels are kept to the set standard? No manufacturing process is foolproof, only regular inspections insure quality.

An expert testified that large composite wood samples tested in a large test chamber resulted in more accurate measurements of formaldehyde. It's reasonable to use both large and small testing chambers, the large for accuracy, the small for economy. There is no benefit for having non-conforming product getting into production, to be later discovered by the customer, especially something containing formaldehyde.

**Negative – 1**

**Timothy O’Leary** - I would recommend changes to the language as stated below. I get the need to make changes here but I have the following comments. I would like to know how much of the cost savings being given to the manufacturers by making this change is anticipated to be passed along to the consumer. Here again, this action will reduce the cost to the manufacturer so there should be some indication as to the amount of cost savings each individual consumer would likely realize. Information should be presented as a per unit cost savings as the individual consumer is interested in neither the industrywide savings nor the savings to each individual plant.

**Abstain – 0**