



MANUFACTURED HOUSING CONSENSUS COMMITTEE

1.888.602.4663 | HUD.GOV/MHS

To: MHCC
From: Kevin Kauffman, AO
Home Innovation Research Labs, 400 Prince George's Blvd, Upper Marlboro, MD 20774
Date: February 6, 2017
Subject: Circulation of Final Results of MHCC Letter Ballot VI – Actions as taken at December 12, 2016 MHCC Meeting

Below are the final results from the letter ballot of actions as taken at December 12, 2016 MHCC teleconference.

[Ballot VI – Actions as taken at December 12, 2016 MHCC Meeting](#)

20 Members Eligible to Vote

18 Ballots Returned

2 Ballots Not Returned –Ishbel Dickens, Richard Weinert

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.	Description of MHCC Motion	Affirm	Negative	Abstain
VI-1	Motion to submit the following 13 comments on the Interpretative Bulletin to HUD. (See Appendix A below)	18	0	0
VI-2	Motion to submit redlined comments on the Interpretative Bulletin to HUD. (See Appendix E from December 12th MHCC Draft Minutes)	18	0	0

All comments received are organized by Ballot Item No. and can be seen below.

Ballot Item VI-1: Motion to submit the following 13 comments on the Interpretative Bulletin to HUD.

MHCC Meeting Action - 18 Affirm, 0 Negative, and 0 Abstain

Comment(s) Received – 1

Affirmative – 1

Timothy O’Leary –

#5, I guess including these definitions in the IB would help define them for the IB but the Standard makes no specific reference to FFF foundations and it only makes a back handed reference to FPSF foundations through its citing of ASCE 32-01. What possible value would having a definition of these things included in the IB if there is no reference to them in the Standard? Won’t that just add to the confusion? Perhaps we should recommend to HUD that we change the standard to include the definitions and not suggest their inclusion in an IB.

#6, This cannot be intended to be site specific as it applies to all HUD code installations in areas where these conditions have potential to exist. The IB explaining the standard should be the same in Wisconsin as it is in Florida as it is in Oklahoma and so on. The site specific part comes into play when an engineer designing the foundation system gets involved. They are the site specific lead.

#8, the problem may not appear in all states but the potential exists for the problem to rear its ugly head in all states. Here again, the explanations in the IB should be generic enough to be all inclusive but specific enough to identify the problem potential.

#9, There is no possible way the IB can assure installation costs will not go up because of the contained explanations. The costs to install will be dependent on the methods selected, the engineering done, site conditions, knowledge and ability of contractor, and a host of other issues. All methods deemed to be compliant must assure the home owner that their home will not be damaged due to frost heave. That is the expectation and it should not be negotiable to save a few dollars in up-front costs.

#10, Having illustrations to further explain the concepts being discussed is a much better method of explanation for the installation folks I know than just giving them a pile of words. I say we leave illustrations in but remove engineer stamps and reference to the design companies. Incorporate them as part of the body of the HUD IB. The only reference to Engineering Language should be the part in the standard where it says “In accordance with acceptable engineering practice to prevent the effects of frost heave: or...” If we want to make some additional reference to Engineering practice, we should change the standard not make reference changes in the IB.

#12, Why remove reference to the SEBA report? The study and subsequent report IS the basis for the IB. It doesn’t have to be the focus but I think to remove all reference from the IB would be a mistake

Negative – 0

Abstain – 0

Ballot Item VI-2: Motion to submit redlined comments on the Interpretative Bulletin to HUD.

MHCC Meeting Action - 18 Affirm, 0 Negative, and 0 Abstain

Comment(s) Received – 2

Affirmative – 2

Timothy O’Leary - The Committee did not have sufficient time to complete discussion on Red Lines. This work could continue during our next session or HUD could rewrite the IB to shorten it and tie it much closer to 3285.312(b). The new document could then go back to sub-committee for further consideration before it comes before the entire Committee. Seems like a 9 paragraph standards section should not need a 24 page interpretive bulletin to explain it. How about using the same format that is in the 9 paragraphs in the standard as the basis for building the IB? Place the definitions of FFF and FPFS under the appropriate paragraph and use the drawings for illustrating a possible example of the intended rule by paragraph. That would tie it all together. Installers, Manufacturers, Designers, Regulators and Local Jurisdictions don’t necessarily need the science behind the rule, they just need to know what to do to comply with the rule. The need for Designer and Installer Training and a good Quality Assurance Inspection processes to assure future compliance with the Standard should also be discussed by the full committee.

Joseph Sadler, Jr. –

- 1) Would like to add definition of “Frost Susceptible Soil” to the IB.
- 2) In the first paragraph of the IB add at the end of the first sentence “where foundations do not extend below the design frost depth” as SEI/ASCE 32-01 states in “Scope and Limitations” of the standard.
- 3) In Section II. DESIGN OPTIONS..... Change the wording in the first bullet to “The local **or state** authority having jurisdiction” (**AHJ**). The North Carolina manufactured housing regulations have a prescribed frost line depth for each county in the State

Negative – 0

Abstain – 0

APPENDIX A:

Motion to submit the following 13 comments on the Interpretative Bulletin to HUD

1. **Tone of the IB needs to be more positive.**
2. **The focus of the IB should be to inform and educate.**
3. **The IB should focus on compliance with 3285.**
4. **The IB should be simplified (too lengthy).**
5. **Add definition for frost free foundation (FFF) and frost protected shallow foundation (FPSF).**
6. **Clarify if the IB is intended to be site specific.**
7. **Target audience should be installers, local jurisdiction, regulators, and manufacturers.**
8. **The problem doesn't seem to appear in all states and how to solve that problem.**
9. **Ensure additional cost are not incurred due to IB.**
10. **Reference to actual designs and specific engineering language in the IB should be removed.**
11. **Ensure IB doesn't exceed reasonable acceptable engineering practice as required in 3285.312(b)(2).**
12. **Remove reference to the SEBA report from the IB.**
13. **Remove local authority having jurisdiction (LAHJ) where the plan approval is not required and in HUD administered states (3286.3 HUD administered installation program) from the IB.**