

Manufactured Housing Consensus Committee

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TO: MHCC Committee Members

FROM: Robert E. Solomon

DATE: November 17, 2010

SUBJECT: Final Results of Circulation of Votes on Part 3280 Letter Ballot 2010

The November 2, 2010 Circulation of Votes ballot deadline has yielded the following vote:

21 Members Eligible to Vote

20 Ballots Received

1 Ballot Not Received – Karl Braun

All votes were affirmative on all ballot items with the exception of those noted below and in the attached report.

Part 3280 – Affirmative with Comments

<u>Proposal No.</u>	<u>Log No.</u>	<u>Section</u>	<u>Name</u>
3280	69	710(d)	K. Jewell, M. Lubliner, M. Santana, T. Sheahan
3280	72	3280.806	T. King
3280	75	3280.715(a)(4)	D. Tompos

3280 – Negative

<u>Proposal No.</u>	<u>Log No.</u>	<u>Section</u>	<u>Name</u>
3280	70	3280.703 3280.707(a)(2)	K. Jewell
3280	72	3280.806	K. Jewell
3280	75	3280.715(a)(4)	T. King, D. Gorman

3280 – Abstain

<u>Proposal No.</u>	<u>Log No.</u>	<u>Section</u>	<u>Name</u>
3280	75	3280.715(a)(4)	M. Santana

FINAL RESULTS OF
MHCC CIRCULATION OF VOTES ON PART 3280
LETTER BALLOT 2010 COMMENTS

AFFIRMATIVE WITH COMMENTS:

3280 #69 – Section 710(d)

KEVIN JEWELL: As a technical note, the MHCC adopted this language in response to HUD's proposal on Venting system terminations. No formal action was taken on Log #69.

MICHAEL LUBLINER: My comment on Log 69 is “MHCC should adopt ASHRAE standard 62.2-2010 and not “cherry pick”.

MANUEL SANTANA: I affirm the MHCC action to accept in principle but would like to comment that the proposed text needs to be revised. It needs to be clear that the 10 ft horizontal and 3 ft vertical requirements will only apply to noxious and hazardous exhaust vents, I would like to note that section R303.4.1 of the IRC excludes exhaust vents from dwelling unit bathrooms, toilet rooms and kitchens from this requirement and that the vertical requirement is 2 ft instead of 3 ft in both the IRC and IPC and should be changed. Source: 09 IRC section R303.4.1, section P3101.5 and 09 IPC section 904.5

TIMOTHY SHEAHAN: I agree with the Committee’s recommendation to accept in principle and feel comprehensive testing under a variety of real-life situations is warranted to determine the efficacy of increasing roof vent separation/extension in minimizing the possibility of hazardous exhaust fumes re-entering the home.

3280 #72 - Section 3280.806

TIMOTHY KING: The followings comments are provided along with my ballot to be submitted by fax. In regards to Log #72 I am voting Affirm with the following comment. Had the presenter of this proposal been at the meeting in Tulsa, or provided cost figures at the time along with an explanation of the operation of the device I may have voted to approve. I have had a chance to talk to the presenter of this proposal since the meeting and better understand the proposal along with the comments that were provided with the ballot. However, I believe that we should not be piece-mealing changes to the National Electrical Code. We could have used this time to consider the entire adoption of an updated version to a referenced standard.

3280 #75 - Section 3280.715(a)(4)

DAVID TOMPOS: I agree with the change; however the minimum frequency should be stated as a percentage of floors produced. It is my opinion that requiring at least one floor per five full days of productions will create a disadvantage for facilities with low production.

3280 NEGATIVE

3280 #70 - Section 3280.703 and 3280.707(a)(2)

KEVIN JEWELL: I believe the MHCC should adopt this proposal in its entirety rather than in part, as the rejected language would have brought the annual fuel utilization efficiency of heat producing appliances in line with referenced national standards. I encourage the submitter to re-submit this proposal with additional supporting information about the rejected language, as the minutes reflect this change was rejected for lack of supporting documentation rather than on its own merits.

3280 #72 - Section 3280.806

KEVIN JEWELL: The failure to update the entire electrical code reference standards to contemporary standards is not sufficient justification to fail to address a specific safety issue that has been brought before the committee. I vote to adopt this proposal.

3280 #75 - Section 3280.715(a)(4)

TIMOTHY KING: In regards to Log #75 I am voting Negative with the following comment. I believe the proposal should be rejected for the following reason. In the comments of substantiation, item #3 the submitter notes that the use of duct mastic for air sealing and adequate mechanical fastening will generally result in less than 5% total leakage. It is my belief that with adequate quality control of the use of mastic and mechanical fastening the result being looked for with the increased testing can be achieved without the increase in testing rates of one floor every five full days of production. At the present time of production this would most likely require significant increase in inspections for small manufacturers and as a result this would increase the cost of the homes due to delays in production for testing on line. The same can be achieved with a good quality control inspection in the use of the mastic and fasteners.

DOUGLAS GORMAN: Defer until matter with DOE is resolved.

3280 – ABSTAIN

3280 #75 - Section 3280.715(a)(4)

MANUAL SANTANA: I abstain from this issue because the proposal was verbally passed before I became a member of the MHCC and I did not take part in the discussions.