



## **Manufactured Housing Consensus Committee**

NFPA 1 Batterymarch Park Quincy, MA 02169

Phone: +1(617) 984-7507 Fax: +1 (617) 984-7110 [www.nfpa.org](http://www.nfpa.org)

November 2, 2012

U. S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street S. W.  
Washington, DC 20410  
ATTN: Secretary Shaun Donovan

Dear Secretary Donovan:

The Manufactured Housing Consensus Committee (MHCC) held a meeting in Arlington, VA on October 23-25, 2012. While the MHCC discussed myriad issues concerning HUD's Manufactured Housing Program, one subject was raised where the MHCC is requesting a time sensitive response by HUD. The issue involves the structural design values that are applied to Southern Pine. In May of 2012, HUD issued a directive indicating that the lower design-values recommended in the National Design Standards (NDS) 2001 edition would have to be applied as of January 1, 2013. During the recent MHCC meeting two motions were passed by the MHCC as follows:

1. The MHCC recommends that HUD delay implementation of the NDS addendum until it is presented to the MHCC or issued as an emergency rule.
2. The MHCC advises that: If the Secretary feels it is necessary to adopt changes, including addenda to the NDS, 2001 Edition, relating to devaluing Southern Pine lumber values, the Secretary should follow Section 604 (b)(5) {Authority to Act and Emergency} of the Manufactured Housing Improvement Act of 2000.

On behalf of the MHCC and in my capacity as the Project Manager with Administering Organization, I am submitting these recommendations to you. Please contact me if you or your staff have any questions on this.

Sincerely,

Robert Solomon, PE  
Project Manager  
Administering Organization

C: DFO – Henry Czauski  
MHCC Members

RES/lm