

Manufactured Housing Consensus Committee

NFPA 1 Batterymarch Park Quincy, MA 02269

Phone: + 1(617) 984-7404 Fax: +1 (617) 984-7110 www.nfpa.org

TO: Manufactured Housing Consensus Committee Members

FROM: Robert E. Solomon

DATE: 18 June 2004

SUBJECT: Circulation of Votes for Letter Ballot Changes To The Construction Standards

The June 11, 2004 ballot deadline has yielded the following vote:

19 Members Eligible to Vote
17 Ballots Received and
2 Ballots Not Returned
0 Abstentions

(C. Leven and R. LaMont)

Negative Votes

<u>Proposed Change Number</u>	<u>24 CFR 3280 Referenced Section</u>	
1-Log#4	§3280 (804(m) (NEW))	W. Farish, D. Ghorbani, D. Gorman and N. Tomasbi
2-Log #5	§3280 (802(42)(m) (NEW))	W. Farish, D. Ghorbani, D. Gorman and N. Tomasbi
3-Log #6	§3280 (801(a) and (b) (NEW))	W. Farish, D. Ghorbani, D. Gorman and N. Tomasbi
4-Log# MHCC1	§3280(Various) (NEW))	W. Farish, D. Ghorbani, D. Gorman and N. Tomasbi

Copies of the Negative votes are enclosed. Please review them. If you wish to change your vote, please do so **by Friday July 2, 2004.**

Submit any changes to:

Jill McGovern
NFPA
1 Batterymarch Park
Quincy, MA 02269
jmcgovern@nfpa.org
Fax: 617-984-7110

REC'D JUN 11 2004 ✓

**LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS**

Please complete the ballot as indicated. If you vote affirmative with comment, negative, or if you abstain on any section, please indicate the reason(s) for doing so. Once you have reviewed the material, and completed this ballot, return to:

Jill McGovern
NFPA
1 Batterymarch Park
Quincy, MA 02269
FAX: (617) 984-7110
EMAIL: jmcgovern@nfpa.org

The due date for receipt of this ballot is: 11 June 2004:

NAME: *BILL FARISIT*

DATE: *JUNE 11, 2004*

With respect to the proposed changes to the standards, record my vote as:

- AFFIRMATIVE ON ALL
- AFFIRMATIVE WITH COMMENT*
- NEGATIVE*
- ABSTAIN*

*Requires supporting reason

SEE ATTACHED SHEET

Reasons for Negative Votes
Bill Farish
June 11, 2004

1 – Log #4 (Arc-fault protection) – I am voting **negative** for the following reasons:

- I am not convinced that arc-fault protection is needed. If it is needed I fail to see why it is only needed in the bedrooms. This leads me to believe that the risk is not well established.
- This adds unnecessary cost to the home. In a typical manufactured home the three bedrooms will require three AFCI's at approximately \$20 more than a conventional breaker for a total increase of \$60 in material cost resulting in close to a \$100 increase in sales price of the home.

2 – Log #5 (Arc-fault definition) – **Negative** (see explanation above.)

3 – Log #6 (2002 NEC by reference) – I am voting **negative** because no.4 below is at least more comprehensive.

4 – Log #MHCC1 (2002 NEC by sections) – I am voting **negative** because I do not feel there is adequate analysis of the real impact of these changes. I am in favor of eventually adopting the latest reference standards. But the HUD code already has many proscriptive portions that are intended to over-ride the corresponding provisions of the NEC. I am not sure that any potential conflicts in these two standards have been identified or eliminated.

REC'D JUN 10 2004 ✓

**LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS**

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NFPA
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Quincy, MA 02269
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EMAIL: jmcgovern@nfpa.org

The due date for receipt of this ballot is: 11 June 2004:

NAME: DANNY GHORBAJI

DATE: 6/10/2004

With respect to the proposed changes to the standards, record my vote as:

- AFFIRMATIVE ON ALL
- AFFIRMATIVE WITH COMMENT*
- NEGATIVE*
- ABSTAIN*

*Requires supporting reason

AS I HAVE MENTIONED SEVERAL TIMES
BEFORE AT NFPA MEETINGS, I HAVE DIFFICULTY
TO AUTOMATICALLY APPROVE NFPA-APPROVED
PROPOSALS (NFPA 501) FOR INCLUSION INTO,
OR REVISION TO THE FEDERAL CODE
(3280). THIS IS BECAUSE BY LAW (THE 2000 ACT)
THE FEDERAL CODE HAS TO MAINTAIN A BALANCE
BETWEEN "THE CONSUMER PROTECTION" ON ^{THE} ONE
HAND AND THE AFFORDABILITY OF OUR HOMES
ON THE OTHER. NO SUCH REQUIREMENTS ARE PART
OF THE PRELUS OF OTHER CODES, INCLUDING NFPA'S. (A04E2)

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm with Comment	Negative	Abstain*
1-Log#4	§3280 (804)(m) (NEW)	A		X	
2-Log #5	§3280 (802)(42)(m) (NEW)	A		X	
3-Log #6	§3280 (801)(a) and (b) (NEW)	AIP		X	
4-Log# MHCCI	§3280(Variants) (NEW)	A		X	

A- Accept
AIP- Accept in Principal

THEREFORE, WHEN SUCH PROPOSALS (NFPA, ICC, ETC.) ARE FORWARDED FOR CONSIDERATION BY MHCC, PROPER ADJUSTMENTS TO THE PROPOSAL SHOULD BE MADE BY THE AUTHOR TO ADDRESS THE FEDERAL CODES' UNIQUE "BALANCE" REQUIREMENT, AMONG OTHER "JUSTIFICATIONS".

REC'D JUN 11 2004 ✓

**LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS**

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**Jill McGovern
NEPA
1 Batterymarch Park
Quincy, MA 02269
FAX: (617) 984-7110
EMAIL: jmcgovern@nfpa.org**

The due date for receipt of this ballot is: 11 June 2004:

NAME: Doug Gorman
DATE: 6/11/04

With respect to the proposed changes to the standards, record my vote as:

- AFFIRMATIVE ON ALL
- AFFIRMATIVE WITH COMMENT*
- NEGATIVE*
- ABSTAIN*

***Requires supporting reason**

Insufficient data provided
regarding cost impact
to consumer.

REC'D JUN 14 2004 ✓

**LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS**

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NFPA
1 Batterymarch Park
Quincy, MA 02269
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EMAIL: jmcgovern@nfpa.org

The due date for receipt of this ballot is: 11 June 2004:

NAME: *Nader Tomaszki*

DATE: *6/11/04*

With respect to the proposed changes to the standards, record my vote as:

- AFFIRMATIVE ON ALL
- AFFIRMATIVE WITH COMMENT*
- NEGATIVE*
- ABSTAIN*

*Requires supporting reason

See Ballot

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm with Comment	Negativ	Abstain*
1-Log#4	§3280 (804(m) (NEW))	A		X	
2-Log #5	§3280 (802(42)(m) (NEW))	A		X	
3-Log #6	§3280 (801(a) and (b) (NEW))	AIP		X	
4-Log# MHCC1	§3280(Various) (NEW))	A		X	

A- Accept

AIP- Accept in Principal

These items should be part of the update with entire NEC. Picking and choosing part of a standard is not a long term solution to update the HUD standard.

Also the data for cost benefit should be provided to the Consensus Committee.