



Manufactured Housing Consensus Committee

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March 29, 2010

Mr. William Matchneer
U.S. Department of Housing & Urban Development
451 Seventh Street, SW
Washington, DC 20410

Dear Mr. Matchneer:

On Tuesday, March 23, 2010, the Manufactured Housing Consensus Committee (MHCC) held a conference call to discuss the proposed rule to revise 24 CFR 3282.8(g) concerning recreational vehicles and park trailers. In accordance with Section 604(b)(3)(ii) of MHIA 2000, the MHCC was afforded a 120 day period (commencing on December 18, 2009) to review the proposed revision.

As a result of the conference call, the MHCC offers the following five comments on the essence of the proposed revision.

1. The provisions of the current regulation for recreational vehicles that are not self propelled should continue to be limited to those units that are 400 square feet or less in area (24CFR 3282(g)(1)(ii) – add back in as new lettered section).
2. The provisions of the current regulation for recreational vehicles that are not self propelled should continue to require such vehicles to be built on a single chassis (24 CFR 3282(g)(1)(ii) – add back as a new lettered section).
3. The revision for recreational vehicles to add a reference to ANSI/NFPA 1192(24 CFR 3282(g)(1)(ii)(C)) should be reconsidered. It is not clear to the MHCC as to how adhering to this standard would correlate with the National Highway Traffic and Safety Administration rules referenced in Item A.
4. The provision for showing a range of sizes for recreational park trailers should be revised to simply state a maximum size (24 CFR 3282(g)(2)(ii)). The resultant text would read: "(ii) ~~Between 320 and~~ 400 square feet or less based on the exterior . . ."
5. The provision to add a reference to ANSI A119.5 (24 CFR 3282(g)(2)(v)) should be reconsidered. The MHCC notes that older units would not be constructed to meet this standard.



The following comments are related to, and somewhat dependent on the changes that the Department might make in response to the comments noted above.

1. If the ANSI/NFPA 1192 referenced is retained, update to reflect the 2008 edition.
2. Editorially correct spelling of "increase" in 24 CFR 3282.8(g)(2)(iii).
3. If the ANSI A119.5 reference is retained, update to reflect the 2009 edition.
4. If the ANSI A119.5 reference is removed as suggested, in Item 5 above, the proposed section 24 CFR 3282.8(g)(2)(iv) can likely be deleted as there would be no standard to inspect and certify to.

The MHCC appreciates the opportunity to review these proposed rules and to offer comments to the Department on this issue.

Sincerely,

A handwritten signature in cursive script that reads "Robert E. Solomon" followed by a large, stylized initial "kac".

Robert E. Solomon, PE
Project Manager
Administering Organization

RES/kac