

Minutes  
HUD Manufactured Housing Consensus Committee  
Hyatt Regency DFW, Dallas, TX  
March 4-6, 2003

1. Chairman Roberts called the meeting to order at 8:30 a.m. DFO Matchneer welcomed the members and noted that there has been developing momentum among the Subcommittees and he looks forward to a productive meeting.
2. Mr. Ghorbani requested that the minutes of the December 4-5, 2002 be corrected to indicate that he asked about the role of the MHCC regarding the HUD budget and contracts under section 604(a)(3) of the MHIA 2000. That correction being noted, the minutes were approved.

Mr. Youse requested that his request for information and background on the elements of the HUD Manufactured Housing Program for which the MHCC is expected to make recommendations be tabled.

Mr. Roberts reported that Mr. Solomon has been delayed and therefore the agenda will be rearranged to hold the discussion of procedures until Mr. Solomon arrives this afternoon. The Subcommittees will meet following this brief session.

Mr. Roberts indicated that public testimony will be heard on Thursday morning, March 6, as per the published agenda.

Mr. Roberts noted that he has held the ballot on the proposed new voluntary standard on fire sprinklers for discussion at this meeting. He requested that the Standards subcommittee discuss the proposal and ballot result and bring a recommendation to the MHCC. Mr. Roberts noted that the standards which passed the ballot now must be put in Federal Register format. Mr. Matchneer reported that Danner and Associates has been retained to put proposals into said format. Messrs. Zieman and Portz asked how long that might take. Mr. Roberts indicated a motion to set a time limit could be considered at the appropriate point in the meeting.

Mr. Weinert asked if a tracking mechanism could be posted on the website to follow the progress of these activities. Mr. Toner indicated that the AO is to maintain a Gantt chart of committee activity that might be posted on the website.

Mr. Matchneer submitted a HUD proposal on on-site completion of manufactured homes. Mr. Walter asked if this day would start of the 120 day clock for the MHCC response. Mr. Matchneer indicated that it does. Mr. Ghorbani asked if this would be considered a proposed rule. Mr. Matchneer

indicated that it would lead to a proposed rule. Mr. Tomasbi asked if this would be an option to the alternative construction (AC) approval process or a revision of the AC process. Mr. Matchneer indicated that it would be an option. Mr. Roberts referred consideration of the proposal to the Regulatory Enforcement Subcommittee. Mr. Berger asked why Regulatory Enforcement rather than the Standards Subcommittee. Mr. Roberts responded that it would be a regulation rather than a standard.

Mr. Ghorbani asked at what point HUD would come to the MHCC with a proposed interpretation. Mr. Matchneer responded that HUD hasn't proposed an interpretation since the MHCC was formed.

Mr. Roberts distributed, as an information item, a flowchart developed by one of his staff on the implementation and procedural elements of the MHIA 2000. Mr. Walter pointed out that the initial slippage in appointment of the MHCC members put the date for submittal of the Installation Standards as 12/27/03. Mr. Roberts agreed; the flowchart was based on the timelines in the Act.

Mr. Roberts distributed, as information items, an outline of 3282, Subpart I and an outline of the Federal Manufactured Home Quality Assurance (QA) Program. He noted that on Wednesday there will be a discussion of the QA system. Mr. Vogt noted that the Subpart I outline was one state's interpretation, other states may have different interpretations. Mr. Roberts also indicated that there would be a presentation on state programs by COSAA representatives on Wednesday.

Mr. Roberts indicated that he had four videos of installation practices available if anyone wished to view them.

The Subcommittee schedules were rearranged so that Subcommittees met consecutively rather than concurrently.

The Committee recessed at 9:30 a.m. for Subcommittee meetings.

The Committee reconvened at 4:00 p.m.

3. Mr. Roberts reported that the recent ballot on the proposed Consumer Assistance Program had brought to light a difference in the interpretation of the by-laws as how votes were to be counted. HUD interpreted the by-laws to indicate that all votes, including abstentions and non-returned ballots, are to be counted in determining whether the necessary 2/3 majority for passage was achieved. The AO used the ANSI procedure of subtracting abstentions and non-returned ballots from the number of voting members to determine the denominator in the 2/3 calculation.

Mr. Matchneer noted that HUD had waived its interpretation to allow the consumer assistance program proposal to pass. However, he stated that the lack of clarity in the by-laws needed to be eliminated.

Ms. Brenton moved, Mr. McHale seconded, that the calculation use the number of eligible voters as the denominator. Mr. Walter noted that the ballot instructions discourage abstentions. He encouraged those with doubts to cast a negative vote. It was noted that in effect an abstention would be a negative vote.

Mr. Matchneer noted that the MHIA2000 states that votes on revised standards must be approved by 2/3 of the voting members of the MHCC. It is silent on votes on other matters, including new standards.

Motion failed, 6 affirmative, 12 negative.

Mr. Roberts appointed Ms. Brenton and Messrs. Youse, Lagano, Walter and Matchneer to develop a recommendation for committee consideration.

4. Mr. Matchneer noted that the initial preemption proposal is being held for formal transmittal to HUD. The earlier letters surfaced the need for letters transmitting recommendations to HUD to contain certain administrative information. Mr. Matchneer noted that the AO is the custodian of the Committee records, verifier that the recommendation met the requirements for approval and should indicate the nature of the recommendation, i.e., standard, regulation or other document, and official transmitter of the recommendation. He and Mr. Solomon are working on a template for the transmittal letter. The AO can then attach the recommendation to the completed template transmittal letter.

Mr. Ghorbani asked whether that meant that the preemption proposal and the consumer assistance program proposal are being held up. Mr. Matchneer replied that they were.

Messrs. Matchneer and Solomon were directed to finalize the transmittal letter template during this meeting. Mr. Ghorbani requested that the MHCC be provided with a copy of the final template.

5. Mr. Solomon noted that a concern had been raised about the "abstention" ballot submitted by Mr. Matchneer who, as DFO, is non-voting member of the Committee. Mr. Ghorbani stated that he welcomed the opinions and views of HUD on any matter at any time but they should not be submitted via a ballot. Ms Brenton requested that all written opinions and views of HUD be included in the records of the MHCC.

6. Mr. Solomon, in response to an email suggestion by Mr. Walter that attempts be made to resolve negatives, noted that there is ample opportunity for members to express their concerns and support at Committee meetings during discussions and votes at meetings. In addition written negative ballots, with reasons, and any comments received, are circulated to the members providing another opportunity for expression of views and changing of minds. Mr. Walter expressed a concern that there is a possibility of a “rush to judgement” on votes taken at meetings, whereas holding a vote until the next meeting might provide for more information exchange and more informed voting.

Mr. Zieman expressed a concern that matters could be tied up in an endless loop. He noted that at the last meeting, matters were discussed by the Subcommittees, the Subcommittee recommendations were discussed by the full MHCC and the MHCC votes to have a letter ballot were unanimous. Mr. Leven expressed a concern that matters would be slowed down and the statutory timetable would not be met.

Mr. Matchneer noted that FACA requires that matters be fully considered by the full MHCC. Mr. Richardson, HUD, noted the importance of everyone understanding what is being voted on. He also noted that there has been a lot of pent-up demand to move items forward and that the pace will subside in the near future. Mr. Solomon noted that even after the recommendations were submitted to HUD there is an opportunity for additional comments after the proposal is published for comment in the Federal Register.

Messrs. Lagano and Youse recommended that some discussion of the matter being letter balloted be included with the ballot. Mr. Toner suggested that “cutting and pasting” the discussion in the minutes would suffice to aid members in recalling the issues.

Mr. Portz stated that he expected members to vote on issues with “full knowledge” of the issue. If a member is uncomfortable with a matter, it is incumbent on him or her to get the discomfort on the table so it can be fully discussed. He noted that not much is solved by email. When a matter goes to letter ballot it should be *pro forma*. Mr. Roberts noted that not all members have the same history on an issue and other members need to share their history. Mr. Matchneer noted that his failure to express his opinion at the December meeting that the consumer assistance proposal would likely be in conflict with the MHIA 2000 led to some consternation among the Committee. Mr. Youse noted the consternation was a result of not having sufficient information early in the discussion.

Mr. Zieman noted that the by-laws provide for a 6 week voting period, a 4 week initial ballot and a 2 week recirculation ballot. Mr. Berger noted the

letter ballot process allowed time to reconsider the issue. Mr. Vogt noted that the letter ballot allowed time to check resource materials.

7. Mr. Solomon noted that response received from ANSI regarding the request for ANSI accreditation of the MHCC. Mr. Matchneer indicated that HUD OGC would have to review the ANSI letter before a follow-up could be drafted for MHCC consideration.

The Committee recessed for the evening at 5:30 p.m.

Wednesday, March 5, 2003

The Committee reconvened at 8:30 a.m.

8. Chairman Roberts called the meeting to order at 8:30 a.m. He introduced Mr. Curtis Mclver, Co-chairman of The Council of State Administrative Agencies (COSAA). Mr. Mclver gave the apologies of Mr. Eric Borg, the other Co-Chair of COSAA, who could not attend for business reasons. Mr. Mclver distributed the COSAA 2002 SAA Update of Optional State Programs. He noted that it demonstrated the variety of approaches taken among the 37 SAAs (the other 13 state programs are under HUD). Mr. Mclver described the Virginia program.

Mr. Matchneer reported that funding of COSAA is a priority for HUD. The appropriations process has held up the HUD budget but funds are now beginning to flow. Mr. Mclver noted that the states had raised this concern at the hearings on the MHIA 2000. Mr. Matchneer indicated that the contract with COSAA should be signed soon. Mr. Vogt noted that most states have to supplement the HUD funding because education and certification programs are costly to run. Mr. Portz noted that this problem must be addressed or whatever MHCC does will not be effective. Mr. Lagano suggested that a Task Group be formed to work with HUD to develop a budget to run the program.

Mr. Youse asked whether COSAA tracks state funding. Mr. Mclver noted that it is difficult to do because states vary in the way the programs are accounted for. Virginia, for example, has a separate account for the manufactured housing program whereas other states do not. COSAA is working with Liz Cocks, HUD, to develop a survey of the states on costs of the elements of a manufactured housing program.

Mr. Mclver noted that the states are waiting to see what the new installation program entails. He noted that some states may contract for it separately rather than include it as part of the SAA program.

Ms. Brenton asked whether COSAA has a compilation of installation and dispute resolution programs. Mr. McIver indicated that COSAA has a compilation of installation programs and that a copy has been provided to HUD. He indicated that COSAA would be gathering information from the states on their dispute resolution programs after HUD funding resumes.

Mr. Vogt noted that states have to pass legislation to establish a manufactured housing program, even if the program is contracted out. He noted that he has been working with North Dakota to establish a program.

Mr. Berger noted that less than 25% of states require training of installers. He asked what the MHCC can do about this. Mr. Matchneer noted that the MHIA 2000 specifies that the installation program to be developed under the Act includes training and licensing of manufactured home installers. Mr. Roberts noted that the Act did not indicate how the administration of such programs is to be funded. He suggested that the MHCC could consider an initiative to create statutory authority to charge fees for such programs. Mr. Vogt noted that retail sales personnel also need training. Mr. Youse concurred. Messrs. Ghorbani and Stinebert indicated that most manufacturers have training programs.

Mr. Zieman asked what states that do not have an installation program or dispute resolution program will do when 2005 comes around. Mr. McIver responded that states are waiting to see what is developed before going to the state legislature. In some states, like Virginia, a different agency regulates installers. He noted that some states probably will not be ready by 2005. Mr. Vogt indicated that such states could get provisional approval.

Mr. Youse asked whether COSAA tracks complaints and length of time to get resolution of the complaint. Mr. McIver indicated that complaints are tracked but not the time it takes for resolution.

Mr. Portz asked what percentage of manufactured homes is represented by the 37 states that have SAAs. Mr. Stinebert indicated that Ohio and Oklahoma are the two states with significant production which do not have SAA programs.

Mr. Roberts thanked Mr. McIver for his presentation and participation.

9. Mr. Bryant described a manufacturer's quality system. He noted that manufactured homes are designed to meet the HUD standards. The designs then must be approved by a Design Approval Primary Inspection Agency (DAPIA); the homes are manufactured to the design and a Production Inspection Primary Inspection Agency (PIIA) monitors the production to ensure that they do comply with the design. A permanent label is applied to the finished home. The manufacturer must have a quality manual that is also

approved by the DAPIA and reviewed by the IPIA. Production records are kept in a permanent file.

Mr. Zieman described the role of the DAPIA. He noted that the DAPIA reviews the designs, quality manual and installation manuals of a manufacturer. The review includes structural, thermal, electrical and mechanical elements of the design as well as the substantiation of performance via engineering analysis or test data. He noted that the HUD standard is largely a performance standard. . An approved design is so stamped and a copy is sent to the monitoring contractor.

Mr. Mafi, Institute for Building Technology and Safety (IBTS) reviewed the role of the HUD monitoring contractor. He noted that his firm may receive as many as 260,000 drawings a year. Up to 10% are selected for review. Identified deficiencies in design are sent to HUD to review and if HUD agrees the DAPIA must ask the manufacturer to redesign the element. Mr. Berger asked how the drawings are chosen for review. Mr. Mafi indicated that every year certain items are targeted for review and a certain amount is randomly selected. Mr. Zieman pointed out that not every drawing amounts to a total redesign, it may only have one small element that is different from other previously approved designs. Mr. Mafi also indicated that every year 25% to 33% of design packages are reviewed. Mr. Portz asked why not monitor every manufacturer. Mr. Bryant noted that 100% of the designs are reviewed by the DAPIA. Mr. Mendlen, HUD, noted that when the same error recurs the DAPIA informs all manufacturers of the problem so corrective action can be taken.

Mr. Roberts described the role of the IPIA. He noted that the IPIA is an in-plant inspector to ensure the manufacturer's quality system is working. In a new plant, every element of a home is inspected though every step of the process. Once a plant is certified there is on-going surveillance. If a change is made in the system, it is inspected. If a problem has been found by the manufacturer a check is made to ensure that corrective action was taken.

Mr. Mafi indicated that IPIAs are monitored much the same as DAPIAs. The IPIAs records are audited. A plant is also audited. The IPIA's personnel qualifications are evaluated against ASTM E 541, *Standard Specification for Agencies Engaged in System Analysis and Compliance Assurance for Manufactured Building*.

Mr. Weinert described the role of the SAA. He noted that the SAA is responsible for monitoring the manufacturer's compliance to subpart I. Manufacturers' records are spot checked at least twice a year. If a consumer complaint is received on a unit manufactured in another state the complaint is forwarded to that state.

Mr. Roberts noted that all of the above reviews how the home is manufactured. How the home is transported or installed is not subject to this quality assurance system. Mr. Roberts reviewed Oregon's installation set-up program. He also reviewed some of the problems encountered in the field.

10. Mr. Roberts listed the issues identified thus far in this meeting:

1. Installation standard
2. Standards update
3. Completion on-site
4. Dispute resolution
5. Federal financing
6. State financing
7. Installation program
  - Installer licensing and training
  - Inspections

Mr. Matchneer reported that HUD has developed Advanced Notices of Proposed Rulemaking (ANPRs) for an installation program and for a dispute resolution program. He expected to be able to distribute copies later in the meeting.

11. Mr. Zieman reported that the Standards Subcommittee had addressed the issues regarding the voluntary sprinkler standard. He noted that concerns were raised about references within NFPA 13D. Concerns were also raised as to whether a voluntary standard was appropriate for reference in a regulation. The Subcommittee had no recommendation to change the result of the letter ballot.

Mr. Zieman also noted that the 2003 edition of NFPA 501 is nearing publication. The subcommittee will review the new material for possible adoption by HUD.

Mr. Roberts asked if there were any problems encountered in conducting a segregated letter ballot. Mr. Zieman indicated that none were encountered. Mr. Matchneer noted a segregated ballot also is a benefit under FACA to ensure full consideration is given to each proposal.

Mr. Solomon noted that copies of email among the members related to a ballot were not considered part of the record of the ballot process, only the actual ballot and comments or reasons for a negative are relevant. Mr. Walter noted that some exchange enhances the review of the document. Mr. Berger noted that he found the emails informative and valuable is seeing different views.

Mr. Portz noted that if one does not have the knowledge base it can be overwhelming to handle over 100 individual items on a ballot. He stressed

the importance of getting all the issues on the table at a meeting so that there is an opportunity to build one's knowledge base. Mr. Youse noted that it is important to have more information early in the process to make sound decisions and to be able to communicate the issues to one's constituents. Mr. Lagano noted that the process will smooth out as members work together. He stressed that if one has a question it is important to raise it at the meeting. Mr. Zieman noted that each member has a responsibility to try to get up to speed on each issue and if one is not comfortable with one's understanding, one should ask questions.

Mr. Ghorbani asked whether letter ballots could be distributed as hard copy. Mr. Portz noted that it has been very helpful to have Jill McGovern distribute documents to the Installation Subcommittee for its discussions.

12. Mr. Roberts suggested that on the issue of federal financing the MHCC could consider recommending an increase in label fees. On the issue of state financing there is recognition of the need for additional funding but he doesn't see enough coming from increased label fees.

Mr. Lagano suggested that the Installation Subcommittee split its resources to handle the installation program and to handle dispute resolution. Mr. Portz suggested that dispute resolution be moved to another subcommittee.

Mr. Vogt suggested the immediate priorities should be numbers 1, 7 and 4 above. Mr. Ghorbani and Ms. Brenton concurred. Mr. Youse agreed and prioritized the remaining issues as 3, 2, 6, and 5. Mr. Ghorbani asked which Subcommittee would handle Subpart I. Ms. Brenton moved that the Installation Subcommittee take on the installation program and the Regulatory Enforcement Subcommittee handle dispute resolution. Motion seconded and passed unanimously.

Mr. Weinert suggested that it was up to the sponsors of the MHIA 2000 to clean up the federal financing issue. Mr. Ghorbani noted that as soon as HUD determines what its needs are industry will help. Mr. Roberts noted that if the MHCC made recommendations it would be helpful. Mr. Ghorbani indicated that he would be happy to share the MHRR letter on the HUD budget request. Mr. Matchneer indicated that HUD was building its program towards the December 2005 implementation date. He is anticipating increased federal responsibility. Ms. Brenton moved that a work group look at the federal appropriation and how it is to be spent now and in the future. Seconded and passed unanimously. Mr. Leven noted that the preamble to a recommendation should note that the funding will support implementation of the actions recommended by the MHCC. Mr. Roberts assigned the task to the Prioritization and Planning Subcommittee.

Mr. Roberts indicated that completion on-site would be handled by the Regulatory Enforcement Subcommittee.

13. Mr. Weinert noted that the Planning and Prioritization Subcommittee should be reviewing proposals from the outside as well as those within the MHCC. A call for proposals should be issued. Ms. Brenton noted that the two major industry associations are represented on the MHCC so those groups should be aware of the MHCC. Mr. Lagano noted that the availability of the form to submit proposals should be publicized. Mr. Nunn, MHI, indicated that the MHI TAC and Manufacturer Division would note the availability of the form in its weekly fax to members. Mr. Portz expressed a concern that the MHCC could be so overwhelmed with proposals that nothing would be done. Mr. Walter noted that proposals are also accepted by the NFPA 501 Committee and caution should be exercised in accepting proposals that have not been reviewed by the NFPA committee. Mr. Ghorbani suggested that once these initial proposals incorporating the current 501 requirements, the MHCC should focus on keeping 3280 current.
14. Mr. Roberts indicated that the Standards and Regulatory Processing Subcommittee would meet this afternoon followed by the Installation Subcommittee. Public testimony would be taken at 8:30 a.m. tomorrow morning followed by additional Subcommittee meetings.
15. Mr. Matchneer reported that the proposal for a waiver for certain standards to expedite their incorporation into 3280 could not be implemented. The proposal would have to go through public notice and comment in accordance with the Administrative Procedures Act. As the specific standards that were recommended for the waiver are included in the two passed ballots there is no need to consider the waiver approach any further. Mr. Nunn asked whether that applied to any waivers already issued. Mr. Matchneer indicated that it did not, those waivers are in force.

The Committee recessed for the rest of the day

Thursday, March 6, 2003

The Committee reconvened at 8:30 a.m.

16. Mr. Roberts opened the meeting by indicating that the Standards and Regulatory Processing Subcommittee will meet immediately following public testimony. That meeting would be followed by a meeting of the Regulatory Enforcement Subcommittee and then by the Installation Subcommittee. The MHCC would reconvene at 1:00 p.m.
17. Mr. Roberts opened the meeting to public testimony.

Mr. Kevin Jewell, Consumers Union, addressed the Committee. He noted that he was pleased to hear that the Committee would be addressing dispute resolution. He noted that it was important for the Committee to keep the process transparent because the results of the Committee's efforts would impact many people. He found the MHCC website very helpful in that regard. Posting the minutes of meetings and other documents on the website is helpful in making the process and decision-making transparent. The availability of the new form for submitting proposals to the MHCC needs to be publicized. He noted that Consumers Union had a "button" on its website for manufactured housing. Mr. Jewell distributed additional copies of the report he distributed at the last meeting.

Mr. Portz indicated that the MHCC would welcome any information on manufactured housing that the Consumers Union could provide the Committee.

Mr. Jake Pauls, representing himself, echoed Mr. Jewell's comments about the need for transparency of the Committee activities. Mr. Pauls noted that he represented American Public Health Association (APHA) before many code and standard bodies. He noted that APHA has a policy statement encouraging HUD "to utilize development and enforcement procedures for manufactured housing regulations that make public health a first priority". Mr. Pauls noted that the APHA policy also expresses a concern that manufactured housing standards could be subject to undue influence through vocal industry lobbying.

Mr. Portz noted any information regarding manufactured housing from the APHA would be welcome. He asked Mr. Pauls about the reference to undue influence. Mr. Pauls noted that he has seen more active participation by non-industry representatives at this meeting than at prior meetings. Mr. Portz noted that, in his opinion, any appearance of undue influence was not purposeful.

Mr. Lagano asked whether the MHCC should consider outreach to the public to make them aware of the MHCC and the opportunity to submit recommendations. Mr. Matchneer noted that notices of the meetings and the agenda are published in the Federal Register.

The committee recessed at 9:15 a.m.

The Committee reconvened at 1:00 p.m.

18. Mr. McHale reported that the Standards and Regulatory Processing Subcommittee felt its charge would be adequately taken care of by the contract with a regulatory attorney to put MHCC recommendations into Federal Register language and therefore moved that the Subcommittee be

discharged. Motion seconded and passed unanimously. Mr. McHale moved that the former Standards and Regulatory Processing Subcommittee be reconstituted to handle the dispute resolution issue with the addition of Ms. Brenton as a user member, Mr. Lagano as a general interest member and Mr. Gorman as a producer member. Motion seconded and passed unanimously. Mr. Matchneer noted that the HUD Secretary would have to approve the new Subcommittee and its membership.

19. Mr. Roberts reported that the Regulatory Enforcement Subcommittee gave the HUD on-site completion proposal a cursory review. Members are to review the proposal with their constituents and colleagues. A Subcommittee conference call will be held the first or second week of April to complete the review of the proposal. There may be several additional conference calls to develop a recommended response to HUD before the next MHCC meeting.
20. Mr. Roberts asked the former Standards and Regulatory Processing Subcommittee to review the HUD ANPR on dispute resolution as background to begin developing a dispute resolution process.

Mr. Roberts asked the Installation Subcommittee to review the HUD ANPR on installation programs as background to begin developing an installation program.

It was noted that the 45-day comment period on the ANPRs did not allow enough time for the MHCC to develop comments.

Mr. Matchneer encouraged members to submit comments on the ANPRs but to do so on their own behalf or their company's behalf, not as MHCC members. Installation Subcommittee members should also forward a copy of their individual comments on the installation ANPR to the AO. Standards and Regulatory Processing Subcommittee members should do the same with their individual comments on the dispute resolution ANPR. The AO will "cut and paste" the comments under each question in the ANPR and distribute them back to the respective Subcommittee.

21. Ms. Brenton distributed proposed changes to the by-laws to clarify the voting process. The process would cover 5 weeks – 2 weeks to return the initial ballot, 1 week for the AO to tabulate the results and 2 weeks for the circulation ballot. The proposed change would also clarify that abstentions and votes not returned are subtracted from the denominator to determine whether a 2/3 majority was achieved. She moved that the proposed changes be adopted. Motion seconded.

Mr. Leven questioned the subtraction of abstentions and unreturned ballots from the calculation of the 2/3 majority for a ballot to pass. He noted that reducing the denominator reduces the amount of consensus needed by the

full MHCC. Mr. Gorman noted that, without the subtraction, an abstention or unreturned ballot is effectively a negative. Mr. Ghorbani recognized Mr. Leven's point and asked for the decision to be held until the next meeting for further consultation. Mr. Gorman asked if the proposed change would apply to all ballots. Mr. Solomon noted that the ANSI procedures apply to any ballot. Mr. Matchneer stated that the issue needed resolution.

After further discussion the motion was amended to require the 2/3 majority be based on the number of MHCC members eligible to vote. Motion passed, Mr. Ghorbani abstaining.

22. Mr. Roberts asked whether the members preferred concurrent or sequential Subcommittee meetings. Everyone agreed that sequential was better.

Mr. Portz requested that the AO send out monthly updates on the progress on converting MHCC recommendations into Federal Register format.

Mr. Matchneer reported that the transmittal letter template has been finalized. Mr. Ghorbani requested that the AO distribute copies of the transmittal letter(s) to the committee when they are sent to HUD. Mr. Solomon indicated that the first letters would be sent by certified mail on March 7, 2003.

23. Mr. Roberts suggested that the next meeting be held in May. Mr. Solomon noted that the budget only included two meetings during this option period and this was the third meeting. Mr. Matchneer indicated that he had cleared the additional meetings with Mr. Calabria.

The next meeting was set for May 28, 29 and 30 in the Washington D.C. area.

Mr. Roberts thanked the members for several days of hard work. He commended Mr. Portz and his Subcommittee for completing an installation standard and he commended Mr. McHale's Subcommittee for reconstituting itself to address dispute resolution. He thanked HUD for presenting new items for the MHCC to consider. Mr. Matchneer thanked the MHCC on behalf of Messrs. Weicher and Calabria for a productive, collegial meeting. Mr. Solomon noted that an incredible amount of progress has been achieved in a short period of time.

The meeting adjourned at 2:00 p.m.

***HUD MANUFACTURED HOUSING CONSENSUS COMMITTEE***  
**ATTENDANCE SHEET**  
**March 4-6, 2003**  
**Dallas, TX**

***STATUS: M=MEMBER; NVM=NON VOTING MEMBER; AO= ADMINISTERING ORGANIZATION;  
 SEC=SECRETARY***

NAME	STATUS	ORGANIZATION	3/4/03	3/5/03	3/6/03
Jack Berger	M	Berger Reconstruction	X	X	X
Karl Braun	M	NAMH – MHOAA	X	X	X
Susan Brenton	M	AZ Association of Manufactured Home Owners	X	X	X
Ed Bryant	M	Champion Enterprises	X	X	X
Danny Ghorbani	M	MHARR	X	X	X
Earl Gilson	M	Olympic Area 03-A Agency on Aging	X	X	X
Doug Gorman	M	Home – Mart, Inc.	X		X
Bill Lagano	M	American Modern Insurance Group	X	X	X
Ronald V. LaMont	M	Alpine Engineering Products	X	X	X
Charles Leven	M	AARP	X	X	X
William Matchneer	NVM	HUD	X	X	
Jerome L. McHale	M	Federation of Manufactured Home Owners of Florida	X	X	X
Bryan R. Portz	M	Chase Manhattan Mortgage Corp.	X	X	X
Dana Roberts	M	Oregon Bldg. Codes	X	X	X
Robert Solomon	AO	NFPA	X	X	X
Nader Tomasbi	M	Liberty Homes, Inc.	X	X	X
Pat Toner	Sec	NFPA	X	X	X
Randy E. Vogt	M	State of MN – Dept. of Administration	X	X	X

NAME	STATUS	ORGANIZATION	3/4/03	3/5/03	3/6/03
Frank Walter	M	MHI	X	X	X
Richard Weinhert	M	State of CA	X	X	X
Alan J. Youse	M	AARP	X	X	X
Mike Zieman	M	RADCO	X	X	
<b><u>ABSENT</u></b>					
Bill Farish	M	Fleetwood Homes			
Christine Walsh Rogers	M	Washington Mutual			

***HUD MANUFACTURED HOUSING CONSENSUS COMMITTEE***  
**GUEST ATTENDANCE SHEET**  
**March 4 – 6, 2003**  
**Dallas, TX**

<b><u>NAME</u></b>	<b><u>ORGANIZATION</u></b>
Timothy Gearan	AARP
William Hug	CARCO Industries
John Ingargiola	FEMA
Kevin Jewell	Consumers Union
Bert Kessler	Palm Harbor Homes
Mike Mafi	IBTS (Institute for Building Technology and Safety)
Jason C. McJury	HUD
Richard Mendlen	HUD/Manufactured Housing Program
Mark A. Nunn	MHI
Jake Pauls	Jake Pauls Consulting Services in Bldg Use & Safety
Chris Richardson	HUD
Boone Smith Morris	TieDown Engineering
Chris Stienbert	MHI
John Weldy	NTA Inc.