

Final Minutes
HUD Manufactured Housing Consensus Committee
Conference Calls
June 27, cont'd August 6, 2003

1. Chairman Roberts opened the call with a roll call of the members and identification of the interested parties on the call.

Mr. Roberts reviewed the agenda. He noted that the minutes of the May 28-30, 2003 meeting have been posted on the website. Approval of those minutes was deferred to the August 20-22 meeting.

Ms. Cocke reported that Mr. Matchneer sent his regards.

2. Mr. Roberts reviewed the background leading to this call. He noted that the Committee had been given a draft notice of proposed rulemaking on On-Site Completion of Manufactured Homes on March 4, 2003 for review before HUD submitted it for publication. He noted that the 120 day clock for response expires August 8. He noted that the Regulatory Enforcement Subcommittee had presented a draft response to the HUD draft at the May 28-30 meeting, however, the MHCC requested that a full discussion of the draft response be deferred until members had sufficient time to review it. The purpose of this call was to have a full discussion of the draft and, hopefully, to approve it for submission to HUD.

Ms. Cocke, as acting DFO, noted that HUD has some generic comments that impact how the MHCC provides responses to HUD's proposals in the future. She noted that HUD is learning how to work within the consensus process created by the MHIA 2000 as much as the MHCC is and these comments are learnings from observing the process thus far. She noted that HUD is expecting "comments" on the elements of proposals it submits to the MHCC rather than "redline/strikeout" re-drafts of the proposals. HUD is required to respond to the "comments". In addition, an explanation of the intent of the comment or MHCC proposed change would be helpful to HUD in determining if it could accommodate the intent, if it could not accept the specific change being recommended by the MHCC.

3. Mr. Roberts asked if there were any comments from the interested parties on the call. There were none.
4. Mr. Roberts noted that Mr. Zieman had sent in his comments on the draft as he was not able to participate in the call and Mr. Roberts proposed that those comments be used as guide to reviewing the draft response. He proceeded to lead a review of the draft response.

June 27, 2003 comments

p.3, line 33-37 - modified to indicate that the manufacturer is responsible for establishing an on-site quality control system and that the IPIA is to conduct oversight of the system.

p.4, line 24 – insert “DAPIA” between “in the” and “approval”

p.4, line 25 – change “DAPIA” to “manufacturer”

p4, line 41 - not accepted

p.5, line 18 – change “identification code” to “prefix SC

p.5, line 22 – “final on-site final inspection report”

p.5, line 23 – “manufacturer’s on-site final inspection reports”

p.5, line 26 – “manufacturer’s”

p.5, line 40 – add “by the manufacturer” at end of sentence

p.5, line 42 – change to indicate that the manufacturer retains a copy of the final inspection report and on-site completion notice

p.6, line 1 – change to indicate that the IPIA is to provide a supply of the on-site completion notices

p.6, line 13 – “final inspection report”

p.6, line 28 – replace “on-site inspections” with “completion program activities”

p.6, line 32 – insert “Preparing the final inspection report” as separate line

p.6, line 37 – “Final Inspection” Report

p.6, line 38 – insert “or the SAA” after “HUD”

p.7, line 1 – change to indicate that the manufacturer certifies that the work was completed

p.7, line 11, 17 – change “an extension” to “part”

p.7, line 23 – delete “for high slope roof conditions”, insert “not” between “would” and “require”; insert “under 3282.14” after “special approval”

p.9, line 14 – add “thermal” to list

The call recessed at this point to be continued on August 6, 2003 beginning with discussion starting on p. 10 of the 5/29/03 draft. Time would be allotted for a lunch break so that the discussion could be concluded and response approved.

August 6, 2003

5. Mr. Roberts called the roll of the MHCC and asked for identification of the interested parties on the call. He welcomed Mr. Matchneer. He reviewed the agenda noting the four actions that would be taken on the call.

He asked if there were any public comments. There were none.

6. Mr. Walter moved that the in first bullet, second item, of the edit objectives “an extension” be changed to “a part”. Seconded and carried.
7. Mr. Walter moved that the “edit objectives” be transmitted to HUD as an explanation of the intent of the MHCC response on the HUD draft. Seconded and carried.
8. Mr. Roberts noted that Mr. Leven had submitted written comments for consideration. Mr. Walter noted that the MHCC is to provide comments on the questions HUD was proposing to ask, not to provide answers at this time. Mr. Matchneer agreed that it is premature for the MHCC to provide answers as the questions may change as a result of the MHCC comments. He did note that the thoughts presented are of value to the process.

Mr. Ghorbani moved that responses to the questions be submitted as a separate document. Seconded and carried.

9. The remainder of the proposed response was reviewed (6/27 update).

p.8, line 11 – insert “reasonably and” between “would” and “most appropriately”

p.9, line 32 – Mr. Weinert stated that there should not be the same quality system on-site as in the manufacturer’s plant; on-site work should be inspected 100%. Mr. Matchneer noted that HUD shared those concerns. Mr. Walter noted there were differences between subdivisions and isolated sites. Mr. Vogt noted that many installations were isolated sites. After discussion, add “and provide written justification for the decisions made” at end of sentence. (Weinert opposed)

p11, line 15 – change to “oversight of IPIA on-site inspection activities should be at the same level as oversight of the work allowed as part of the siting process”.

p.12 line 4 – add “thermal”

p.13, line 35 – insert “on-site” after “The”; delete “required by paragraph (b)(4)(iii) of this section”

p.13, line 37 – change “commitment by” to “requirement for”

p.14 – correct several typos

p.17, line 27 – change “in” to “with”

10. Mr. Ghorbani noted that the revised response reflects the edit objectives and moved that it be accepted. Seconded and carried (Weinert opposed)

Mr. Ghorbani moved that the response be submitted to HUD. Seconded and carried.

11. Mr. Roberts expressed his appreciation for the Committee's effort. Mr. Matchneer noted that HUD considered this a very important part of what it is trying to do.

Mr. Portz noted the importance of having a policy representative from HUD participate on these calls or at MHCC and Subcommittee meetings. Mr. Matchneer acknowledged the benefit but noted that HUD cannot commit itself until a proposal goes to the Secretary.

12. Ms. Brenton noted that at the last meeting it was reported that 8 – 9 proposals have been received and that the Planning and Prioritization Subcommittee was waiting to receive them.
13. Mr. Roberts thanked the members for their time and participation. The call adjourned at 1:05 p.m.

June 27, 2003 Conference Call participants

MHCC Members

Dana Roberts, Chairman; Jack Berger; Susan Brenton, Ed Bryant, Bill Farrish, Danny Ghorbani, Doug Gorman, Bill Lagano, Chuck Levin, Jerry McHale, Nader Tomasbi, Randy Vogt, Frank Walter, Richard Weinert, Alan Youse

HUD Staff

Elizabeth Cocke, DFO; Rick Mendlen, John Stevens, Eleanor Cornejo

AO

Robert Solomon, Pat Toner

Guests

Mark Nunn, Chris Stinebert, Bert Kessler, Andy Kochera

August 6, 2003 Conference Call participants

MHCC Members

Dana Roberts, Chairman; Jack Berger; Karl Braun, Susan Brenton, Ed Bryant, Bill Farrish, Danny Ghorbani, Earl Gilson, Doug Gorman, Bryan Portz, Nader Tomasbi, Randy Vogt, Frank Walter, Richard Weinert, Alan Youse

HUD Staff

Bill Matchneer, DFO, Elizabeth Cocke, Elsie Draughn, Rick Mendlen, John Stevens, Frank Quigley, Eleanor Cornejo, Shawn McKee

Guests

Mark Nunn, Chris Stinebert, Bert Kessler, Katie Spears, Andy Kochera,

HUD MANUFACTURED HOUSING CONSENSUS COMMITTEE
ATTENDANCE
June 27, 2003
Teleconference

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

<u>NAME</u>	<u>STATUS</u>	<u>ORGANIZATION</u>
Dana Roberts	M	Oregon Bldg. Codes
Jack Berger	M	Berger Reconstruction
Susan Brenton	M	AZ Association of Manufactured Home Owners
Ed Bryant	M	Champion Enterprises
Elizabeth Cocke	NVM	HUD
Bill Farish	M	Fleetwood Homes
Danny Ghorbani	M	MHARR
Doug Gorman	M	Home – Mart, Inc.
Bill Lagano	M	American Modern Insurance Group
Charles Leven	M	AARP Federation of Manufactured Home
Jerome L. McHale	M	Owners of Florida
Robert Solomon	AO	NFPA
Nader Tomasbi	M	Liberty Homes, Inc.
Pat Toner	Sec	NFPA
Randy E. Vogt	M	State of MN – Dept. of Administration

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ATTENDANCE
June 27, 2003
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<u>NAME</u>	<u>STATUS</u>	<u>ORGANIZATION</u>
Frank Walter	M	MHI
Richard Weinert	M	State of CA
Alan J. Youse	M	AARP

<u>ABSENT</u>	<u>STATUS</u>	<u>ORGANIZATION</u>
Karl Braun	M	NAMH – MHOAA
Earl Gilson	M	Olympic Area 03-A Agency on Aging
Ronald V. LaMont	M	Alpine Engineering Products
William Matchneer	NV	HUD
Bryan R. Portz	M	Chase Manhattan Mortgage Corp.
Christine Walsh Rogers	M	Washington Mutual
Mike Zieman	M	RADCO

**HUD MANUFACTURED HOUSING CONSENSUS
COMMITTEE
ATTENDANCE
June 27, 2003
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<u>NAME</u>	<u>ORGANIZATION</u>
Eleonora Cornejo	HUD
Joan Kayagil	HUD
Bert Kessler	Palm Harbor Homes
Andy Kochera	AARP
Richard Mendlen	HUD/Manufactured Housing Program
Mark A. Nunn	MHI
Connie Parker	Consumer Finance
John Stevens	HUD
Chris Stienbert	MHI