

# **Manufactured Housing Consensus Committee**

NFPA 1 Batterymarch Park Quincy, MA 02269

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

**TO:** Manufactured Housing Consensus Committee Members

**FROM:** Robert E. Solomon

**DATE:** 28 February 2003

**SUBJECT:** **Final Ballot Results for Segmented Ballot #1 – Update MHCSS – 1997 and 1999 Editions of NFPA 501**

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The 24 February 2003 Ballot Circulation Deadline has yielded the final ballot results:

21 Members Eligible to Vote  
19 Ballots Received and  
2 Ballots Not Returned

(Messrs. Gilson and Leven)

Mr. Weinert returned an affirmative vote on all items during circulation.

0 Abstentions

Affirmative with Comments

2-99

(Messrs. Berger and Lagano)

8-97

(Messrs. Ghorbani, Gorman, Portz, Tomasbi and Youse)

14-97

(Mr. Vogt)

17-97

(Mr. Walter)

18-97

(Mr. Vogt)

28-99

(Mr. Vogt)

Negative

1-99

(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

2-99

(Messrs. Braun, Brenton, Ghorbani, Gorman, McHale, Portz, Roberts, Tomasbi and Youse)

5-97

(Mr. Berger)

8-97

(Mr. Berger and Ms. Walsh Rogers)

19-99

(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

20-99

(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

21-99

(Ms. Walsh Rogers and Messrs. Ghorbani, Gorman, Portz and Tomasbi)

22-99

(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

23-99

(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

24-99

(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

25-99

(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

26-99

(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

27-99	(Messrs. Ghorbani, Gorman, Portz and Tomasbi)
28-99	(Messrs. Ghorbani, Gorman, Portz and Tomasbi)
29-99	(Messrs. Ghorbani, Gorman, Portz and Tomasbi)
30-99	(Messrs. Ghorbani, Gorman, Portz and Tomasbi)
31-99	(Messrs. Ghorbani, Gorman, Portz and Tomasbi)
32-99	(Messrs. Ghorbani, Gorman, Portz and Tomasbi)
33-99	(Messrs. Ghorbani, Gorman, Portz and Tomasbi)

Copies of the final Affirmative with comments, Negatives and Abstention votes are enclosed.

The MHCC require a letter ballot or an equivalent formal recorded vote with approval of two-thirds of the *MHCC*.

Please note Log 2-99 did not receive the required 2/3 majority to pass. The action on this comment will be reported as "Reject".

Enclosures

Jill McGovern

NFPA

1 Batterymarch Park – P.O. Box 9101

Quincy, MA 02269-9101

[jmcgovern@nfpa.org](mailto:jmcgovern@nfpa.org)

Fax: 617-984-7110

Phone: 617-984-7404

Enclosure

RES:jtm

MHCC

Project Manager: Robert Solomon

REC'D FEB 6 2003

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

Vote on the proposed changes to the  
Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 edition)

**AFTER VOTING, RETURN ONE COPY OF BALLOT TO NFPA  
1 BATTERYMARCH PARK, QUINCY, MA 02269, OR FAX TO (617)884-7110**

Must be received by NFPA  
By: February 8, 2003

Committee Action:  
A = Accept

Send ballot to: Jill McGovern  
jmcgovern@nfpa.org

Negative votes or abstentions must be accompanied with reasons for so voting. Please make comments on a separate sheet.  
If handwritten, please use black ink only. If voting Affirmative on all items, only return this page to NFPA.

With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: February 5, 2003

Signed: 

Name: Jack Berger  
Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A			
2-99	3280.210 NEW	A	X		
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A		X	
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A		X	

\* Reasons must accompany these votes

*Jack Bergen*

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A			
20-99	803(k)(1)	A			
21-99	804(f)	A			
22-99	805(a)(2)	A			
23-99	805(a)(3)(vi) NEW	A			
24-99	806(b)	A			
25-99	806(d)	A			
26-99	806(d)(11) NEW	A			
27-99	806(g) NEW	A			
28-99	807(c)	A			
29-99	808(f)	A			
30-99	808(h)	A			

\* Reasons must accompany these votes

*Jack Buger*

<b>Proposed Change Number</b>	<b>24 CFR 3280 Referenced Section</b>	<b>Comm Action</b>	<b>Affirm With Comment</b>	<b>Neg*</b>	<b>Abstain*</b>
31-99	808(k)	A			
32-97	811(a)(1)(i)	A			
33-99	813(b)	A			

\* Reasons must accompany these votes

**Comments associated with *Negative and Affirmative with Comment Line Item Votes on MHCC Letter Ballot for the Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 edition)***

Submitted By MHCC Member:

  
Jack Berger

Date: February 5, 2003

**Negative Votes:**

1. Proposed Change #5-97 604(b)(2) NEW - Having personally experienced a very negative episode with poly-butylene piping, I cannot at this time support any standard that provides for anything but copper supply lines for domestic plumbing.
2. Proposed Change #8-97 607(b)(3)(i) - This standard appears to rule out drive-in shower bases for wheelchair users. I cannot at this time support any standard that prohibits drive-in showers without special exception (Alternative Construction letter) as this appears to be discriminatory.

**Affirmative with Comment Vote:**

1. Proposed Change #2-99 3280.210 NEW - I have on numerous occasions had to install fire suppression systems in totally detached single family dwellings. I find the concept of residential fire suppression systems in affordable housing somewhat of an oxymoron for the following reasons:
  - The water service line typically has to be much larger than a typical domestic service line to allow for the flow necessary for the sprinkler system. The cost of the initial tap fee increases dramatically with this size.
  - Many water companies and water authorities base their monthly base service fee on the size of the service lateral. This has resulted in monthly base service fees in excess of 500% higher than that for a typical domestic service account.
  - Often the water system itself does not even have the capacity in the main service line to even handle the flow requirements of a residential suppression system necessitating installation of holding tanks and pump systems which do not lend themselves to typical manufactured housing installations, and can cost over \$10,000.
  - As the system remains inactive and stagnant, annual service on the system is necessary, which must be performed by a certified fire suppression system contractor. This is costly, and often is neglected due to this cost, rendering the system's functioning questionable were it ever needed in the event of an actual fire.
  - The standard establishes a basic life-safety system as opposed to personal property protection system. Manufactured housing units are, by law, already designed for life safety egress.

With all that stated, however, I cannot vote against the standard change. If, because of funding source or local jurisdiction requirements, or if the manufactured housing unit is to be used for non-conventional housing purposes (small group homes, limited care facilities, etc.) which mandate a residential fire suppression system, then a standard should be in place to regulate the design and installation.

2 of 3

MHCC

Project Manager: Robert Solomon

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

Vote on the proposed changes to the

Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 edition)

REC'D FEB 4 2003

**AFTER VOTING, RETURN ONE COPY OF BALLOT TO NFPA  
1 BATTERY MARCH PARK, QUINCY, MA 02269, OR FAX TO (617)984-7110**

Must be received by NFPA  
By: February 6, 2003

Committee Action:  
A = Accept

Send ballot to Jill McGovern  
jmcgovern@nfpa.org

Negative votes or abstentions must be accompanied with reasons for so voting. Please make comments on a separate sheet.  
If handwritten, please use black ink only. If voting Affirmative on all items, only return this page to NFPA.

With respect to the Committee's actions on the proposed changes that accompanied this ballot, please record me as voting:

- Affirmative on all items, or
- Affirmative except as indicated below

Date: 2-4-03

Signed: Karl Braun

Name: KARL BRAUN  
Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A			
2-99	3280.210 NEW	A		X	
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A			

\* Reasons must accompany these votes

COMMENT ON NEGATIVE VOTE FOR 2-99 3280.210 NEW.

I BELIEVE THE CURRENT CONSTRUCTION STANDARDS PROVIDE  
ADAQUATE FIRE PROTECTION FOR NEW MANUFACTURED HOMES AND  
SPRINKLER SYSTEMS WOULD ADD UNNESSESARY EXPENSE.

KARL BRAUN

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

Vote on the proposed changes to the  
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REC'D FEB 3 2003

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 jmcgovern@nfpa.org

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With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

- Affirmative on all items, or  
 Affirmative except as indicated below

Date: 2/3/03

Signed: Susan L. Brenton

Name: Susan L. Brenton  
 Type or Print in black ink

**Vote**

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With		
			Comment	Neg*	Abstain*
1-99	3280.208	(A)			
2-99	3280.210 NEW	A		X	
3-97	603(a)(2)	(A)			
4-99	603(b)(4)(iii)	(A)			
5-97	604(b)(2) NEW	(A)			
6-97	605(a)(7)(i)	(A)			
7-97	607(b)(2)(v)	(A)			
8-97	607(b)(3)(i)	(A)			

\* Reasons must accompany these votes

Sue Bumton

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	(A)			
10-97	607(b)(4)(i)	(A)			
11-97	607(b)(5) NEW	(A)			
12-99	607(c)(6)	(A)			
13-97	609(b)(7)	(A)			
14-97	609(b)(7)	(A)			
15-97	610(b)(1)	(A)			
16-97	702(a)	(A)			
17-97	714(1)(i)	(A)			
18-97	715(a)(1)	(A)			
19-99	803(f)	(A)			
20-99	803(k)(1)	(A)			
21-99	804(f)	(A)			
22-99	805(a)(2)	(A)			
23-99	805(a)(3)(vi) NEW	(A)			
24-99	806(b)	(A)			
25-99	806(d)	(A)			
26-99	806(d)(11) NEW	(A)			
27-99	806(g) NEW	(A)			
28-99	807(c)	(A)			
29-99	808(f)	(A)			
30-99	808(h)	(A)			

\* Reasons must accompany these votes

*See Draft*

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A			
32-97	811(a)(1)(i)	A			
33-99	813(b)	A			

\* Reasons must accompany these votes

**Date:** February 3, 2003  
**To:** Manufactured Housing Consensus Committee  
**From:** Susan Brenton  
**RE: NEGATIVE VOTE FOR MHCC - #1 - PROPOSED CHANGE 2-99 REGARDING  
24 CFR 3280.210 (NEW)**

I am opposed to the inclusion of language regarding fire sprinkler systems, even though it outlines minimum standards for systems which are (at this particular point in time) optional. I do not see a need for this proposed change.

REC'D FEB 5 2003

MHCC

Project Manager: Robert Solomon

**Manufactured Housing Consensus Committee**  
 Letter Ballot for MHCC - #1  
 Vote on the proposed changes to the  
 Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 edition)

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Must be received by NFPA  
 By: February 6, 2003

Committee Action:  
 A = Accept

Send ballot to: Jill McGovern  
 jmcgovern@nfpa.org

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With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

- Affirmative on all items, or  
 Affirmative except as indicated below

Date: 2/5/2003

Signed: 

Name: DANNY GHODRANI  
 Type of Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A		<del>X</del>	
2-99	3280.210 NEW	A		<del>X</del>	
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A	<del>X</del>		

\* Reasons must accompany these votes

Danny Ghorbani

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A			
20-99	803(k)(1)	A			
21-99	804(f)	A			
22-99	805(a)(2)	A			
23-99	805(a)(3)(vi) NEW	A			
24-99	806(b)	A			
25-99	806(d)	A			
26-99	806(d)(11) NEW	A			
27-99	806(g) NEW	A			
28-99	807(c)	A			
29-99	808(f)	A			
30-99	808(h)	A			

\* Reasons must accompany these votes

*Danny Ghorbani*

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A		<del></del>	
32-97	811(a)(1)(i)	A		<del></del>	
33-99	813(b)	A		<del></del>	

\* Reasons must accompany these votes

Danny Ghorbani

**PROPOSED  
CHANGE NUMBER**

**SEGMENTED BALLOTS #1  
AMENDMENTS, COMMENTS, JUSTIFICATIONS,  
ETC.**

1-99

This issue is better addressed under proposal 9 ROP/ROC.

2-99

**JUSTIFICATION FOR NEGATIVE BALLOT ON ITEM  
2-99 (3280.210 NEW) IN THE SEGMENTED BALLOT  
#1; AND ITEM 10 ROP (210(E) NEW) IN THE  
SEGMENTED BALLOT #2**

I am casting a negative vote on this item because I feel very strongly that it should be held back for much more detailed study, analysis and consideration. Fire sprinklers in manufactured homes --- even under a voluntary basis, as is the case with this specific proposal --- is a very complicated issue which requires a tremendous amount of detailed information, discussion and debate. Therefore, without getting into any technical and/or cost related details of the proposal, following are the basic legislative/regulatory related reasons for my negative ballot:

- Fire safety aspects of manufactured homes are properly addressed in the current 3280 Standards. The requirements have had good results as studies show that there are 50% less fire related accidents in manufactured homes than in site-built homes.

- The high retail cost associated with sprinklers and related work in manufactured homes (currently estimated at \$4,450-\$4,700 for single section; \$ 5,500 - \$5,800 for double section and \$6,300 \$6,700 for triple section) prohibits their use in such dwellings.

- The "preemptive" nature of manufactured housing code should discourage local jurisdictions from contemplating fire sprinklers requirement in manufactured homes.

- In the rare event where a local jurisdiction might require fire sprinklers in all types of residential dwellings, the recently-enhanced "preemptive provision" of the 2000 Act

Danny Ghorbani

should be utilized to secure exemption for manufactured homes in such local ordinances.

- If such efforts fail, there already exists a voluntary "fire sprinkler system provision" in the NFPA 501 standards which can be utilized for compliance. There is no need to include the same standards in the 3280 as these standards, by law, have to be cost effective in order to maintain a proper balance between the affordability of manufactured homes and protection of consumers. There are no such restrictions placed upon the development and maintenance of the NFPA 501 Standards. As an aside, this mandate is another reason that the 3280 Standards must remain unique and independent, and without too much overlap with the NFPA 501. Fire sprinklers is one item, for example, that the 3280 Standards should defer to the NFPA 501 (i.e. if and when compliance is absolutely necessary).

- This proposed "voluntary standard" will not withstand the rigorous system of the Federal Manufactured Home Procedural and Enforcement Regulations for too long. The history of the Federal program clearly demonstrates that it would be a matter of time before such a "voluntary standard" would become mandatory.

8-97

Add, at the end of this section, "Showers that comply with the ADA requirements shall be exempt".

This would enable a manufacturer to comply with a homebuyer's request without going through the rigorous HUD AC letter requirement.

19-99  
thru  
33-99

All these proposals have been extracted from the 2002 Edition of NEC. Instead of using this piecemeal approach, we should consider a complete update of the current edition of NEC that is in the 3280 Standards.

MHCC

Project Manager: Robert Solomon

**Manufactured Housing Consensus Committee**

REC'D FEB 6 2003

Letter Ballot for MHCC - #1

Vote on the proposed changes to the

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Must be received by NFPA  
By: February 6, 2003

Committee Action:  
A = Accept

Send ballot to: Jill McGovern  
jmcgovern@nfpa.org

Negative votes or abstentions must be accompanied with reasons for so voting. Please make comments on a separate sheet.  
If handwritten, please use black ink only. If voting Affirmative on all items, only return this page to NFPA.

With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: 2/6/03

Signed: 

Name: Doug Gorman  
Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A		X	
2-99	3280.210 NEW	A		X	
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A	X		

\* Reasons must accompany these votes

Doug Gorman

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A		X	
20-99	803(k)(1)	A		X	
21-99	804(f)	A		X	
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26-99	806(d)(11) NEW	A		X	
27-99	806(g) NEW	A		X	
28-99	807(c)	A		X	
29-99	808(f)	A		X	
30-99	808(h)	A		X	

\* Reasons must accompany these votes

Doug Gorman

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A		X	
32-97	811(a)(1)(i)	A		X	
33-99	813(b)	A		X	

\* Reasons must accompany these votes

Doug Gorman

PROPOSED  
CHANGE NUMBER

SEGMENTED BALLOTS #1  
AMENDMENTS, COMMENTS, JUSTIFICATIONS,  
ETC.

1-99

THIS ISSUE IS BETTER ADDRESSED UNDER  
PROPOSAL 9 ROP/ROC

2-99

JUSTIFICATION FOR NEGATIVE BALLOT ON ITEM  
2-99 (3280.210 NEW) IN THE SEGMENTED BALLOT  
#1; AND ITEM 10 ROP (210(E) NEW) IN THE  
SEGMENTED BALLOT #2.

I AM CASTING A NEGATIVE VOTE ON THIS ITEM  
BECAUSE I FEEL VERY STRONGLY THAT IT  
SHOULD BE HELD BACK FOR MORE DETAILED  
STUDY AND CONSIDERATION.

FIRE STUDIES SHOW THAT THERE ARE 50% LESS  
FIRE RELATED ACCIDENTS IN MANUFACTURED  
HOMES THAN IN SITE-BUILT HOMES.

THE HIGH COST OF SPRINKLERS AND RELATED  
WORK IN MANUFACTURED HOMES PROHIBIT  
THEIR USE IN SUCH DWELLINGS.

THE "PREEMPTIVE PROVISION" OF THE 2000 ACT  
SHOULD BE USED TO EXEMPT MANUFACTURED  
HOMES IN SUCH LOCAL ORDINANCES.

8-97

ADD, AT THE END OF THIS SECTION, "SHOWERS  
THAT COMPLY WITH THE ADA REQUIREMENTS  
SHALL BE EXEMPT".

THIS WOULD ENABLE A MANUFACTURER TO  
COMPLY WITH A HOMEBUYER'S REQUEST  
WITHOUT GOING THROUGH THE RIGOROUS HUD  
AC LETTER REQUIREMENT.

19-99  
THRU  
33-99

ALL OF THESE PROPOSALS HAVE BEEN  
EXTRACTED FROM THE 2002 EDITION OF  
NEC. INSTEAD OF USING THIS PIECEMEAL  
APPROACH, WE SHOULD CONSIDER A  
COMPLETE UPDATE OF THE CURRENT EDITION  
OF NEC THAT IS IN THE 3280 STANDARDS.

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

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If handwritten, please use black ink only. If voting Affirmative on all items, only return this page to NFPA.

With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: January 17, 2003

Signed: W.J. LAGANO

Name: William J. LAGANO  
Type or Print in black ink

**Vote**

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A			
2-99	3280.210 NEW	A	✓		
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A			

\* Reasons must accompany these votes

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A			
20-99	803(k)(1)	A			
21-99	804(f)	A			
22-99	805(a)(2)	A			
23-99	805(a)(3)(vi) NEW	A			
24-99	806(b)	A			
25-99	806(d)	A			
26-99	806(d)(11) NEW	A			
27-99	806(g) NEW	A			
28-99	807(c)	A			
29-99	808(f)	A			
30-99	808(h)	A			

\* Reasons must accompany these votes

William Lagano

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A			
32-97	811(a)(1)(i)	A			
33-99	813(b)	A			

\* Reasons must accompany these votes

From: Bill Lagano  
Date: January 17, 2003

The second item on the ballot, proposed change number 2-99 seems a bit ambiguous regarding paragraphs (a) and (b). I believe the intent in (b) is that if a sprinkler system is installed whether required or not, it must be tested and installed per ... However, it is very easy to interpret (a) and (b) collectively to mean: if the authority having jurisdiction does not require a fire sprinkler system, yet one is installed, it does not have to be tested or meet the specific requirements.

I would suggest first sentence in (b) to begin with: *Whether the jurisdiction having authority has or has not required a fire sprinkler system, if one is installed in a manufactured home, it shall be installed and tested ...*

MHCC

Project Manager: Robert Solomon

REC'D JAN 31 2003

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

Vote on the proposed changes to the

Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 edition)

REC'D JAN 31 2003

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Must be received by NFPA  
By: February 6, 2003

Committee Action:  
A = Accept

Send ballot to: Jill McGovern  
jmcgovern@nfpa.org

Negative votes or abstentions must be accompanied with reasons for so voting. Please make comments on a separate sheet.  
If handwritten, please use black ink only. If voting Affirmative on all items, only return this page to NFPA.

With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: Jan 31, 2003

Signed:

Name:

Jerome L McHaleJerome L McHale

Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A			
2-99	3280.210 NEW	A		X	
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A			

\* Reasons must accompany these votes

- 1 -

Jerome McHale

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A			
32-97	811(a)(1)(i)	A			
33-99	813(b)	A			

Comment 2-99

fire sprinkler system

many areas and manufactured homes are served by water from wells. This source of water supply does not normally have the pressure to operate fire sprinklers.

as information this same item covering "fire sprinklers" is also included in the 2000 edition, note 10 ROP, pg. 17, 11 ROP, 12 ROP pg. 18.

MHCC

Project Manager: Robert Solomon

REC'D FEB 6 2003

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

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By: February 6, 2003

Committee Action:  
A = Accept

Send ballot to: Jill McGovern  
jmcgovern@nfpa.org

*FAX 1-617-984-7110*

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If handwritten, please use black ink only. If voting Affirmative on all items, only return this page to NFPA.

With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: 2-6-03

Signed: *Bryan R. Porter*

Name: BRYAN R. PORTER  
Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A		X	
2-99	3280.210 NEW	A		X	
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A	X		

\* Reasons must accompany these votes

Bryan Portz

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A		X	
20-99	803(k)(1)	A		X	
21-99	804(f)	A		X	
22-99	805(a)(2)	A		X	
23-99	805(a)(3)(vi) NEW	A		X	
24-99	806(b)	A		X	
25-99	806(d)	A		X	
26-99	806(d)(11) NEW	A		X	
27-99	806(g) NEW	A		X	
28-99	807(c)	A		X	
29-99	808(f)	A		X	
30-99	808(h)	A		X	

\* Reasons must accompany these votes

Bryan Portz

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A		X	
32-97	811(a)(1)(i)	A		X	
33-99	813(b)	A		X	

1-99

Better addressed under proposal  
9 ROP/ROL

2-99

need for more detailed  
study and consideration  
Preemptive provision of <sup>MHIA</sup> ~~the~~ 2000  
Act should be used to ~~exempt~~  
MH in ordinances where highest  
~~cost~~ OF SPRINKLERS prohibit their  
use

8-97

Add "showers that comply with  
ADA requirements shall be exempt"  
at the end of this section

19-99 thru 33-99

Instead of this approach consider  
a complete update of the current  
edition of NEC, in 3280 stds.

\* Reasons must accompany these votes

MHCC

Project Manager: Robert Solomon

REC'D FEB 3 2003

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

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By: February 6, 2003

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jmcgovern@nfpa.org

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With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: 2/3/03

Signed: Dana C Roberts

Name: Dana C Roberts  
Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A			
2-99	3280.210 NEW	A		X	
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A			

\* Reasons must accompany these votes

Dana Roberts

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A			
20-99	803(k)(1)	A			
21-99	804(f)	A			
22-99	805(a)(2)	A			
23-99	805(a)(3)(vi) NEW	A			
24-99	806(b)	A			
25-99	806(d)	A			
26-99	806(d)(11) NEW	A			
27-99	806(g) NEW	A			
28-99	807(c)	A			
29-99	808(f)	A			
30-99	808(h)	A			

\* Reasons must accompany these votes

- 2 -

*Dana Roberts*

<b>Proposed Change Number</b>	<b>24 CFR 3260 Referenced Section</b>	<b>Comm Action</b>	<b>Affirm With Comment</b>	<b>Neg*</b>	<b>Abstain*</b>
31-99	808(k)	A			
32-97	811(a)(1)(i)	A			
33-99	813(b)	A			

\* Reasons must accompany these votes

### 2-99 Negative Vote Comments

I believe the intent of this proposal is best addressed in regulations and not standards. I would suggest that if the local authority having jurisdiction requires all residential housing to have sprinklers, then they should be installed according to DAPIA approved designs and the regulations should so state.

To put potential preemption considerations in a standard and not in the preemption portion of the regulations is at best confusing and at worst runs the risk of either being ignored or required for all manufactured houses since the manufacturer would not know for sure if the local authority where the house may be sold required sprinklers.

Further, sprinklers cannot be completely installed in the factory. Consequently, on-site completion is critical and the only current mechanism to hold the manufacturer accountable for on-site work is through the alternative construction letter process for items not in the standard that is spelled out in regulations. Generally, completing sprinkler installations is not something homeowners or installers would be familiar with. The entity that should be accountable is the manufacturer but this proposal only requires the manufacturer to provide instructions.

If people are going to rely on sprinkler systems for safety they must be tested and determined operational. This proposal does not identify who would be accountable for making this happen.

MHCC

Project Manager: Robert Solomon

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

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Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 edition)

REC'D FEB 6 2003

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By: February 6, 2003

Committee Action:  
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Send ballot to: Jill McGovern  
jmcgovern@nfpa.org

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With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: February 6, 2003

Signed: *Christine Walsh Rogers*  
Name: Christine Walsh Rogers  
Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A			
2-99	3280.210 NEW	A			
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A		X	

\* Reasons must accompany these votes

*Christine Walsh Rogers*

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A			
20-99	803(k)(1)	A			
21-99	804(f)	A		X	
22-99	805(a)(2)	A			
23-99	805(a)(3)(vi) NEW	A			
24-99	806(b)	A			
25-99	806(d)	A			
26-99	806(d)(11) NEW	A			
27-99	806(g) NEW	A			
28-99	807(c)	A			
29-99	808(f)	A			
30-99	808(h)	A			

\* Reasons must accompany these votes

*Christine Walsh Rogers*

**Proposed  
Change  
Number**

**24 CFR 3280 Referenced Section**

**Comm  
Action**

**Affirm  
With  
Comment**

**Neg\***

**Abstain\***

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A			
32-97	811(a)(1)(i)	A			
33-99	813(b)	A			

\* Reasons must accompany these votes

**Letter Ballot for MHCC #1**  
**Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 Edition)**

**Proposed Change #8-97 Negative.** Adequate language should be added to allow for variations to shower compartments for access by persons with disabilities. In this case, shower compartment(s) should meet ADA standards or other similar performance criteria.

**Proposed Change #21-99 Negative** 6 Ft 7 in may be too high for persons with disabilities.

**Letter Ballot for MHCC #2**  
**Comparison between NFPA 501 (2001 edition) and 24 CFR 3280 (1999 Edition)**

**Proposed Change 2 ROP-Negative** There are no known fans that will operate continuously for 10 years. This is an unreasonable expectation.

**Proposed Change 21 ROP-Affirm with Comment** I would like more specific information about the counties affected and the wind speed loan requirements.

**Proposed Change 24 ROP-Affirm with comment** There is a typo and the word "with" is used two times in the same sentence.

**Proposed Change 35 ROP ROC- Negative** (2) 1/4" nominal is too low, should be 3/8"

**Proposed Change 36 ROP ROC- Affirm with comment** Minimum inspections should be every four months.

**Proposed Change 95r ROP-Affirm with comment** Typo-should read "manufactured" homes.

Comments submitted by Christine Walsh Rogers

MHCC

Project Manager: Robert Solomon

REC'D FEB 5 2003

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

Vote on the proposed changes to the

Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 edition)

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Send ballot to: Jill McGovern  
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With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: 2/5/2003

Signed: Nader Tomarbi

Name: NADER TOMARBI  
Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A		<input checked="" type="checkbox"/>	
2-99	3280.210 NEW	A		<input checked="" type="checkbox"/>	
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A	<input checked="" type="checkbox"/>		

\* Reasons must accompany these votes

*Nader Tomasbi*

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A		<del>X</del>	
20-99	803(k)(1)	A		<del>X</del>	
21-99	804(f)	A		<del>X</del>	
22-99	805(a)(2)	A		<del>X</del>	
23-99	805(a)(3)(vi) NEW	A		<del>X</del>	
24-99	806(b)	A		<del>X</del>	
25-99	806(d)	A		<del>X</del>	
26-99	806(d)(11) NEW	A		<del>X</del>	
27-99	806(g) NEW	A		<del>X</del>	
28-99	807(c)	A		<del>X</del>	
29-99	808(f)	A		<del>X</del>	
30-99	808(h)	A		<del>X</del>	

\* Reasons must accompany these votes

*Nader Tomasbi*

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A		<input checked="" type="checkbox"/>	
32-97	811(a)(1)(i)	A		<input checked="" type="checkbox"/>	
33-99	813(b)	A		<input checked="" type="checkbox"/>	

\* Reasons must accompany these votes

" Nader Tomasbi  
 Liberty Homes, Inc.

5-Feb-2003

Letter Ballot for MHCC - #1

Proposed Change Number	Comments
1-99	Proposal 9 ROP/ROC addresses this issue in more details.
2-99	This is a complicated issue that requires additional amount of detailed information. This proposal requires additional study.
8-97	This proposal does not exempt the showers that meet the ADA requirements. This addition would eliminate the current AC process.
21-99	last sentence should be clarified to note " <u>finished</u> floor" to eliminate confusion if the panel is mounted on the exterior of the home.
19-99 through 33-99	Combining parts and pieces of the 2002 edition of NEC with HUD referenced 1993 NEC would create confusion. Adapting the 2002 NEC with proper exemptions ( i.e. arc fault & etc) should be the approach.

MHCC

Project Manager: Robert Solomon

REC'D FEB 3 2003

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

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Send ballot to: Jill McGovern  
jmcgovern@nfpa.org

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With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below

Date: 2/3/03

Signed: [Signature]

Name: RANDY E. VOGT  
Type or Print in black ink

**Vote**

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
1-99	3280.208	REA			
2-99	3280.210 NEW	REA			
3-97	603(a)(2)	REA			
4-99	603(b)(4)(iii)	REA			
5-97	604(b)(2) NEW	REA			
6-97	605(a)(7)(i)	REA			
7-97	607(b)(2)(v)	REA			
8-97	607(b)(3)(i)	REA			

\* Reasons must accompany these votes

Randy C. Vogt

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	REV			
10-97	607(b)(4)(i)	REV			
11-97	607(b)(5) NEW	REV			
12-99	607(c)(6)	REV			
13-97	609(b)(7)	REV			
14-97	609(b)(7)	A	REV		
15-97	610(b)(1)	REV			
16-97	702(a)	REV			
17-97	714(1)(i)	REV			
18-97	715(a)(1)	A	REV		
19-99	803(f)	REV			
20-99	803(k)(1)	REV			
21-99	804(f)	REV			
22-99	805(a)(2)	REV			
23-99	805(a)(3)(vi) NEW	REV			
24-99	806(b)	REV			
25-99	806(d)	REV			
26-99	806(d)(11) NEW	REV			
27-99	806(g) NEW	REV			
28-99	807(c)	A	REV		
29-99	808(f)	REV			
30-99	808(h)	REV			

\* Reasons must accompany these votes

Randy E. Vogt

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	R/W			
32-97	811(a)(1)(i)	R/W			
33-99	813(b)	R/W			

\* Reasons must accompany these votes



Admin  
**MINNESOTA**

Department of Administration

**Comments for letter ballot MHCC #1**  
**For proposed changes to CFR 3280 construction standards**

- #14-97, CFR 609(b)(8). *Affirmative with comment.* Remove NFPA numbers 7-9.2.8 from the wording.
- #18-97, CFR 715(a)(1). *Affirmative with comment.* Remove NFPA numbers 8-15.1.1 from the wording.
- #28-99, CFR 807 (c). *Affirmative with comment.* Section 410-4 (d) of the N.E.C. is for lighting fixtures not allowed to be installed over a shower or tub. 410-4 (a) references approved for damp and wet locations. The reference cited appears to be out of place as shown in proposed rules.

*Ray E. V. J.*

MHCC

Project Manager: Robert Solomon

REC'D JAN 31 2003

**Manufactured Housing Consensus Committee**

Letter Ballot for MHCC - #1

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Committee Action:  
A = Accept

Send ballot to: Jill McGovern  
jmcgovern@nfpa.org

*Fax: 617-984-7110 (4 pages)*

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With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

Affirmative on all items, or

Affirmative except as indicated below *(17-97)*  
*(see attached sheet)*

Date: 01-31-03

Signed:

*Frank Walter*

Name:

FRANK WALTER

Type or Print in black ink

Vote

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With		
			Comment	Neg*	Abstain*
1-99	3280.208	A			
2-99	3280.210 NEW	A			
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A			

\* Reasons must accompany these votes

Frank Walter

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i) (a)	A	X		
18-97	715(a)(1)	A			
19-99	803(f)	A			
20-99	803(k)(1)	A			
21-99	804(f)	A			
22-99	805(a)(2)	A			
23-99	805(a)(3)(vi) NEW	A			
24-99	806(b)	A			
25-99	806(d)	A			
26-99	806(d)(11) NEW	A			
27-99	806(g) NEW	A			
28-99	807(c)	A			
29-99	808(f)	A			
30-99	808(h)	A			

\* Reasons must accompany these votes

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A			
32-97	811(a)(1)(i)	A			
33-99	813(b)	A			

\* Reasons must accompany these votes

**Frank Walter, P.E.  
3609 Sprucedale Drive  
Annandale, VA 22003-1948**

**Comments on Ballot #1, MHCC Vote Regarding NFPA 501 (1997 and 1999 Editions**

**Proposed Change Number 17-97:**

**AFFIRM with Comments:**

1. The correct referenced section is: 714(a)(1)(i); please insert the "(a)" on page 2 of the Ballot #1, and in two places on page 9 of the 8/99 spreadsheet.
2. On page 9 of the 8/99 spreadsheet, middle column, under 714(a)(1)(i), there is an inappropriate "1" on the first line, before the word "Electric" that should be stricken.

MHCC

Project Manager: Robert Solomon

**Manufactured Housing Consensus Committee**

REC'D FEB 8 2003

Letter Ballot for MHCC - #1

Vote on the proposed changes to the  
Comparison between NFPA 501 (1997 and 1999 editions) and 24 CFR 3280 (1999 edition)

**AFTER VOTING, RETURN ONE COPY OF BALLOT TO NFPA  
1 BATTERYMARCH PARK, QUINCY, MA 02269, OR FAX TO (617)884-7110**

Must be received by NFPA  
By: February 8, 2003

Committee Action:  
A = Accept

Send ballot to: Jill McGovern  
jmcgovern@nfpa.org

Negative votes or abstentions must be accompanied with reasons for so voting. Please make comments on a separate sheet.  
If handwritten, please use black ink only. If voting Affirmative on all items, only return this page to NFPA.

With respect to the Committee Actions on the proposed changes that accompanied this ballot, please record me as voting:

- Affirmative on all items, or
- Affirmative except as indicated below

Date: 2.2.03

Signed: Alan J. Youse  
Name: ALAN J. YOUSE  
Type or Print in black ink

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Vote		
			Affirm With Comment	Neg*	Abstain*
1-99	3280.208	A			
2-99	3280.210 NEW	A		<i>Yes/No?</i>	
3-97	603(a)(2)	A			
4-99	603(b)(4)(iii)	A			
5-97	604(b)(2) NEW	A			
6-97	605(a)(7)(i)	A			
7-97	607(b)(2)(v)	A			
8-97	607(b)(3)(i)	A	<i>LOA NEEDS??</i>		

\* Reasons must accompany these votes

Youse

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
9-97 ✓	607(b)(3)(v) NEW	A			
10-97	607(b)(4)(i)	A			
11-97 ✓	607(b)(5) NEW	A			
12-99	607(c)(6)	A			
13-97	609(b)(7)	A			
14-97	609(b)(7)	A			
15-97	610(b)(1)	A			
16-97	702(a)	A			
17-97	714(1)(i)	A			
18-97	715(a)(1)	A			
19-99	803(f)	A			
20-99	803(k)(1)	A			
21-99	804(f)	A			
22-99	805(a)(2)	A			
23-99	805(a)(3)(vi) NEW	A			
24-99	806(b)	A			
25-99	806(d)	A			
26-99	806(d)(11) NEW	A			
27-99	806(g) NEW	A			
28-99	807(c)	A			
29-99	808(f)	A			
30-99	808(h)	A			

\* Reasons must accompany these votes

Alan J. Yousse

Proposed Change Number	24 CFR 3280 Referenced Section	Comm Action	Affirm With Comment	Neg*	Abstain*
31-99	808(k)	A			
32-97	811(a)(1)(i)	A			
33-99	813(b)	A			

2-99 - NEGATIVE - TRUE COSTS OF SPKR INSTALLATION NOT CLEAR.

POSSIBLE CONFLICT OF INTEREST ON BEHALF OF NPPA-

AFFIRMATIVE EXCEPT AS INDICATED.

8-97 - AOA REQUIREMENTS NOT SPELLED OUT

IT IS EXTREMELY IMPORTANT THAT ALL OF THESE DOCUMENTS ACCURATELY REFLECT ALL CHANGES BEFORE SUBMITTAL TO AOW.

\* Reasons must accompany these votes