

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: 6 July 2004

SUBJECT: **Final Results for Letter Ballot Changes To The Construction Standards**

The July 2, 2004 ballot deadline has yielded the following vote:

19 Members Eligible to Vote
19 Ballots Received and
12 Affirmative
7 Negatives
0 Abstentions

C. Leven submitted his vote on circulation. E. Bryant, R. Lamont and F. Walter changed their vote from Affirmative to Negative on circulation.

Negative Votes

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

The MHCC requires a letter ballot or an equivalent formal recorded vote with approval of two-thirds of the *MHCC*. None of the four items on this letter ballot achieved the required number of affirmative votes to be submitted to HUD as a formal recommendation. The 2/3 votes are based on the total number of eligible votes (19) minus abstain votes (0) and unreturned votes (0). Thus 2/3^{rds} of 19 votes was necessary to move forward.

LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS

REC'D JUN 24 2004
CIR

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: *Ed Bryant*
DATE: *6-24-2004*

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

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

Negatives

*Requires supporting reason

See Attached

Ed Bryant
6/24/04

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# MHCCI	§3280(Various) (NEW))	A		X	

A- Accept
AIP- Accept in Principal

Reasons for Negative Votes

1. After review of the negative votes and careful consideration of the cost implications, I am changing my MHCC vote to "negative" for the four electrical changes currently being considered by the consensus Committee.
2. To selectively extract items from a later version of the NEC may cause unforeseen conflicts. These items should be considered when a more comprehensive update of the electrical requirements could be accomplished.
3. In the interest of trying to maintain affordable housing, the added cost of these proposed changes has not been demonstrated to be cost beneficial.

Ed Buzant
6/24/07

REC'D JUN 11 2004 ✓

**LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS**

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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 SITEBT

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**

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:

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NEPA
1 Batterymarch Park
Quincy, MA 02269
FAX: (617) 984-7110
EMAIL: jmcgovern@nepa.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 NHEC MEETINGS, I HAVE DIFFICULTY
TO AUTOMATICALLY APPROVE NFPA-APPROVED
PROPOSALS (NEPA 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 (A0452)

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3-Log #5	§3280 (801)(a) and (b) (NEW)	AIP		X	
4-Log# MHCC1	§3280 (Various) (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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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.

LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS

CIRC

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:

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

NAME: *Ronald W. Salt*

DATE: *6/18/2004*

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

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

*Requires supporting reason

*I have changed my vote to Negative for following.
 Not adequate justification to require arc fault in bedrooms.
 Do not believe the added cost justifies protection in bedrooms.
 If and when the latest edition of the referenced standard
 is adopted any change required will be made at that time.*

REC'D JUN 14 2004 ✓

**LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS**

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

NAME: *Nader Tomasi*

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	Negative	Abstain*
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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.

REC'D JUN 24 2004

CIR

LETTER BALLOT
CHANGES TO THE CONSTRUCTION STANDARDS

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

NAME: Frank Walter

Frank Walter

DATE: 06-24-04

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

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

*Requires supporting reason

The four proposed changes, attached,
lack an adequate analysis of their impacts.
These changes pick and choose from a
proposed update of the NEC in the MHCS.
A more complete analysis of the proposed
update to the 2002 NEC should be
made available to the MHCC, including
a benefit/cost analysis for adding
arc-fault circuit interrupters.

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4-Log# MHCCI	§3280(Various) (NEW))	A		X	

A- Accept
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