3280HUD- Log #80 **Final Action:**
(3280.406 (New))

Submitter: James P. Van Schoyck, PFS Corporation
Recommendation: Add text to Subpart E, Testing to read as follows:
Sec. 3280.406 Air chamber test methods (Primary and Secondary) for certification and qualification of formaldehyde emission levels.
(a) Preconditioning. Preconditioning of plywood or particleboard panels for air chamber tests shall be initiated as soon as practicable but not in excess of 30 days after the plywood or particleboard is produced or surface-finished, whichever is later, using randomly selected panels.
(1) If preconditioning is to be initiated more than two days after the plywood or particleboard is produced or surface-finished, whichever is later, the panels must be dead-stacked or air-tight wrapped until preconditioning is initiated.
(2) Panels selected for testing in the air chamber shall not be taken from the top or bottom of the stack.
(b) Primary method testing. Primary method Testing shall be conducted in accordance with the Standard Test Method for Determining Formaldehyde Levels from Wood Products Under Defined Test Conditions Using a Large Chamber, ASTM E-1333-90, with the following exceptions:
(1) The chamber shall be operated indoors.
(2) Plywood and particleboard panels shall be individually tested in accordance with the following loading ratios:
(i) Plywood--0.29 Ft2/Ft3, and
(ii) Particleboard--0.13 Ft2/Ft3.
(3) Temperature to be maintained inside the chamber shall be 77 (deg) plus or minus 2 (deg) F.
(4) The test concentration (C) shall be standardized to a level (C_o) at a temperature (t_o) of 77 (deg)F and 50 percent relative humidity (H_o) by the following formula:

$$C = C_o x [1 + Ax (H - H_o)] \times e\text{-}R(1 / t - 1 / t_O)$$

where:
C = Test formaldehyde concentration
C_o = Standardized formaldehyde concentration
e = Natural log base
R = Coefficient of temperature (9799)
t = Actual test condition temperature (° K)
t_o = Standardized temperature (° K)
A = Coefficient of humidity (0.0175)
H = Actual relative humidity (%)
H_o = Standardized relative humidity (%)

The standardized level (C_o) is the concentration used to determine compliance with Sec. 3280.308(a).
(5) The air chamber shall be inspected and recalibrated at least annually to insure its proper operation under test conditions.
(c) Secondary method testing. Secondary method testing is defined as specified in ASTM D6007-02, with the additional conditions specified below:
(1) The secondary method shall be operated using the testing conditions and loading rates specified in ASTM D 6007-02, and the conditioning time used to establish equivalence with the primary method. In addition, when testing panels, the secondary method shall be operated by testing nine specimens representing evenly distributed portions of an entire panel. The nine specimens shall be tested in groups of three specimens, resulting in three test results, which shall be averaged to represent one data point for the panel.
(2) Equivalence between the secondary method and the primary method must be established, at least once each year, for each testing laboratory used for CFR 3280 compliance. Minimum requirements for an equivalence demonstration shall include at least ten comparison sample sets, which compare the results of the primary and secondary methods. The following parameters must be met in the comparison:
(i) For the primary method, each comparison sample shall consist of the result of simultaneously testing an appropriate number of panels (factoring in the loading rate) from the same batch of panels tested by the secondary method.

(ii) For the secondary method, each comparison sample shall consist of testing nine specimens representing evenly distributed portions of an entire panel. The nine specimens shall be tested in groups of three specimens (factoring in the loading rate), resulting in three test results, which shall be averaged to represent one data point for the panel, and matched to their respective primary method comparison sample result.

(iii) The ten comparison sample sets shall consist of testing a minimum of five sample sets in each of at least two of the following ranges of formaldehyde concentrations, as measured by the primary method:

a. Lower range: less than 0.07 ppm

b. Intermediate range: 0.07 to less than 0.15 ppm

c. Upper range: 0.15 to 0.30 ppm

(3) The average and standard deviation of the difference of all comparison sets shall be calculated as follows. For each of the two ranges used for testing, the following computations shall be performed:

(i). Denote the number of sets in the given range by n.

(ii). Compute the difference for the ith set by D_i, where i ranges from 1 to n.

(iii) Compute the average, X, and standard deviation, S, of the differences according to the following formulas:

*** Insert Equations here***

(4) The secondary method shall be considered equivalent to the primary method if the following condition is met for both tested ranges:

$[X] + 0.88\ S \leq C$

where C is equal to :

0.026 for the lower range;
0.038 for the intermediate range; and
0.052 for the upper range.

(5) Equivalence must be established between the primary and secondary method to represent the range in emissions based on the emission standards specified in section (c), (2), (iii).

[49 FR 32012, Aug. 9, 1984, as amended at 58 FR 55009, Oct 25, 1993]

Substantiation: Currently Section 3280.406 *"Air chamber test method for certification and qualification of formaldehyde emission levels"* requires the Formaldehyde Emission Level test to be performed in accordance with ASTM E1333 *"Test Method for Determining Formaldehyde Levels from Wood Products Under Defined Test Conditions Using a Large Chamber."* PFS Corporation is requesting an alternate test method to the standard ASTM E 1333 test.

There are two (2) most recent formaldehyde emissions limitation programs in the United States and they are:

1. California Air Resources Board (CARB) *"ATCM to Reduce Formaldehyde Emission From Composite Wood Products."*
2. Environmental Protection Agency (EPA) Public Law 11-199 *"Title VI - Formaldehyde Standards for Composite Wood Products."*

Both CARB and EPA specify the use of ASTM E1333 but also allow the use of ASTM D6007 test method after equivalence has been proven between the two. Note - the equivalence is based on satisfactory compliance with minimum allowable variation between the ASTM E1333 test results and the ASTM D6007 test results which are determined on the same sample. PFS testing laboratory conducted the correlation protocol using our ASTM D6007 small chamber *(Mobledehyde)* test apparatus. The Mobledehyde is a CARB approved secondary method. A copy of the PFS Corporation correlation test results showing compliance with requirement is Attachment A.

Note: Supporting material is available for review at NFPA Headquarters.

COST BENEFIT: The reasons for this request is that the ASTM D6007 is a more efficient test method because the

sample size is smaller and the test is completed in less time. This difference reduces sample preparation time, shipping and handling costs, and the time to conduct the emission measurement which is a big savings to the HUD manufacture program.

Because the small chamber testing takes approximately 14 fewer hours than large chamber and the amount of lab area required is smaller - the cost savings is significant. During a 24 hour period - the small chamber has allowed for PFS to generate $6,000.00 in testing fees using three small chambers vs. $600.00 using the large chamber method. We allow for the small chambers to run via computer controlled data acquisition for over-night testing. This eliminates need for staff over-time.

3280HUD- Log #81 Final Action:
(3280.403)

Submitter: Robert Luter, Kinro, Inc. / Rep. American Architectural Mfrs. Assn. (AAMA)
Recommendation: We propose that in general § 3280.403 be revised as shown on the attached to reference the newly published AAMA 1701.2-2012 Standard for Windows and Sliding Glass Doors Utilized in Manufactured Housing. We also propose that § 3280.403(d)(2) specifically be revised to reflect ASTM 2190, which has replaced the obsolete ASTM E774 and E774; and that § 3280.403(e)(1) specifically be revised to add a reference to ISO Guide 65, the General Requirements for Bodies Operating Product Certification Systems now also referenced in AAMA 1701.2-2012.

Proposed Revisions
§ 3280.403 Standard for Windows and Sliding Glass Doors used in Manufactured Homes.
(a) Scope. This section sets the requirements for prime windows and sliding glass doors except for windows used in entry doors. Windows so mounted are components of the door and thus are excluded from this standard.
(b) Standard. All primary windows and sliding glass doors shall comply with ~~AAMA 1701.2–95~~ AAMA 1701.2–12, Voluntary Standard Primary Window and Sliding Glass Door for Utilization in Manufactured Housing, except the exterior and interior pressure tests must be conducted at the design wind loads required for components and cladding specified in § 3280.305(c)(1).
(c) Installation. All primary windows and sliding glass doors shall be installed in a manner which allows proper operation and provides protection against the elements (see § 3280.307).
(d) Glass.
(1) Safety glazing materials, where used, shall meet ~~ANSI Z97.1–1984~~ ANSI Z97.1–2009, "Safety Performance Specifications and Methods of Test for Safety Glazing Materials Used in Buildings."
(2) Sealed insulating glass, where used, must meet all performance requirements ~~for Class C~~ in accordance with ASTM E2190 Standard Specification for Insulating Glass Unit Performance and Evaluation ~~ASTM E 774–97, Standard Specification for the Classification of the Durability of Sealed Insulating Glass Units. The sealing system must be qualified in accordance with ASTM E773–97, Standard Test Methods for Accelerated Weathering of Sealed Insulating Glass Units.~~ Each glass unit must be permanently identified with the name of the insulating glass manufacturer.
(e) Certification. All primary windows and sliding glass doors to be installed in manufactured homes must be certified as complying with ~~AAMA 1701.2–95~~ AAMA 1701.2–12. This certification must be based on tests conducted at the design wind loads specified in § 3280.305(c)(1).
(1) All such windows and doors must show evidence of certification by affixing a quality certification label to the product in accordance with ANSI Z34.1–1993, Third-Party Certification Programs for Products, Processes, and Services or ISO Guide 65, General Requirements for Bodies Operating Product Certification Systems.
(2) In determining certifiability of the products, an independent quality assurance agency shall conduct preproduction specimen test in accordance with ~~AAMA 1701.2–95~~ AAMA 1701.2–12. Further, such agency must inspect the product manufacturer's facility at least twice per year.
(f) Protection of primary window and sliding glass door openings in high wind areas. For homes designed to be located in Wind Zones II and III, manufacturers shall design exterior walls surrounding the primary window and sliding glass door openings to allow for the installation of shutters or other protective covers, such as plywood, to cover these openings. Although not required, the Department encourages manufacturers to provide the shutters or protective covers and to install receiving devices, sleeves, or anchors for fasteners to be used to secure the shutters or protective covers to the exterior walls. If the manufacturer does not provide shutters or other protective covers to cover these openings, the manufacturer must provide to the homeowner instructions for at least one method of protecting primary window and sliding glass door openings. This method must be capable of resisting the design wind pressures specified in § 3280.305 without taking the home out of conformance with the standards in this part. These instructions must be included in the printed instructions that accompany each manufactured home. The instructions shall also indicate whether receiving devices, sleeves, or anchors, for fasteners to be used to secure the shutters or protective covers to the exterior walls, have been installed or provided by the manufacturer.

Substantiation: Statement of Problem and Substantiation
The HUD standard has not kept pace with these revisions. As a result, Part 3280 cites a 1995 AAMA standard that is obsolete, by virtue of multiple updates and incorporation by reference of obsolete ASTM Standards. In addition, the HUD Standard cites ASTM Standards for insulating glass that were rendered obsolete and superseded in 2006. The disconnect between the cited standard and current standard creates confusion for both those seeking product

certification and for the certifying bodies.

Background

The American Architectural Manufacturers Association (AAMA) has enjoyed a long relationship with HUD and the Manufactured Housing Community, crafting the original fenestration standards cited in Part 3280, Manufactured Home Construction And Safety Standards. As part of the AAMA commitment to continuous maintenance of these and other standards, the AAMA Document Management Committee (DMC) is charged with the responsibility of reviewing our documents and standards annually in order to properly manage their revision. Our Standard Operating Procedures dictate that we review all of our documents that are five or more years old for any revisions that need to be made; this can include updating references, making staff edits, assigning a task group to make minor editorial or major content changes, and in some cases sunsetting documents that have been superseded or otherwise rendered obsolete. AAMA Standard 1701.2, the Voluntary Standard for Utilization in Manufactured Housing for Primary Windows and Sliding Glass Doors, has been part of this review process since the document was originally published. Since publication of the 1995 version cited in Part 3280, this standard has been updated twice; first in 2002 and most recently in 2012.

Summary of Changes from AAMA 1701.2-95 to AAMA 1701.2-12

- A table of contents was added.
- An expanded definitions section was added.
- Various editorial/grammatical changes were made.
- Updated reference document dates throughout.
- Added test grouping guidelines.
- Added sash drop test for non-counterbalanced sashes.
- Added a section for mulled combination window assemblies.
- Added glazing thickness selection guidelines in accordance with ASTM E1300 to replace outdated square footage chart.
- Added option to comply with either ANSI Z34.1 or ISO Guide 65 in Section 1.3.
- Added requirement for sealants to “meet or exceed AAMA 803.3” in Section 4.1.4.

Cost/Benefit Analysis

The industry will benefit from this change from the perspective that current AAMA standards will be referenced and references to obsolete ASTM standards will be corrected. This will allow Fenestration manufacturers to test and certify to standards that are up to date. This will also allow AAMA to sunset obsolete documents.

An industry transition from the AAMA 1701.2-95 standard to the AAMA 1701.2-12 standard need not cause any turmoil in the industry nor result in undue costs to the manufacturer or supplier. As the changes to the standard over the years have been substantially editorial, the transition process can be very simple, as was the process when the current 1701.2-95 standard was adopted. A 6 month transition period should be sufficient to update certification paperwork and assure that the correct standard date is noted on certification labeling.

We suggest that all products previously tested and certified against AAMA 1701.2-95 remain acceptable for ongoing use in HUD code homes, contingent on maintaining active status in a third party testing and certification program. (All products currently certified to AAMA 1701.2-95 will meet all the performance requirements of AAMA 1701.2-12; however the testing and certification documents cite the ‘95 standard, as that’s what’s called for in the HUD code).

After the adoption of the AAMA 1701.2-12 standard, new testing and certification activities will be conducted against the new standard and noted as such in test reports and certification documents.

Following the transition period, previous versions of AAMA 1701.2 will be sunsetted and active publication ceased by AAMA in accordance with AAMA policy.

Thank you for your consideration in this matter. If you have any questions, please contact me directly.

3280HUD- Log #82 **Final Action:**
(3280.404)

Submitter: Robert Luter, Kinro, Inc.
Recommendation: We propose that § 3280.404 be revised as shown to reference the newly published AAMA 1701.2 - 2012 Standard for Windows and Sliding Glass Doors Utilized in Manufactured Housing and AAMA 1704–12, Voluntary Standard Egress Window Systems for Utilization in Manufactured Housing .

Proposed Revisions
§ 3280.404 Standard for Egress Windows and Devices for use in Manufactured Homes.
(a) Scope and Purpose. The purpose of this section is to establish the requirements for the design, construction, and installation of windows and approved devices intended to be used as an emergency exit during conditions encountered in a fire or similar disaster.
(b) Performance. Egress windows including auxiliary frame and seals, if any, shall meet all requirements of ~~AAMA 1701.2–95~~ AAMA 1701.2–12, Voluntary Standard Primary Window and Sliding Glass Door for Utilization in Manufactured Housing and AAMA Standard ~~1704 – 85~~ 1704–12, Voluntary Standard Egress Window Systems for Utilization in Manufactured Housing, except the exterior and interior pressure tests for components and cladding must be conducted at the design wind loads required by § 3280.305(c)(1).
(c) Installation. (1) The installation of egress windows or devices shall be installed in a manner which allows for proper operation and provides protection against the elements. (See § 3280.307.)
(2) An operational check of each installed egress window or device shall be made at the manufactured home factory. All egress windows and devices shall be openable to the minimum required dimension without binding or requiring the use of tools. Any window or device failing this check shall be repaired or replaced. A repaired window shall conform to its certification. Any repaired or replaced window or device shall pass the operational check.
(d) Operating Instructions. Operating instructions shall be affixed to each egress window and device and carry the legend "Do Not Remove."
(e) Certification of Egress Windows and Devices. Egress windows and devices shall be listed in accordance with the procedures and requirements of AAMA Standard ~~1704-85~~ 1704–12. As of January 17, 1995, this certification must be based on tests conducted at the design wind loads specified in § 3280.305(c)(1).
(f) Protection of Egress Window Openings in High Wind Areas. For homes designed to be located in Wind Zones II and III, manufacturers shall design exterior walls surrounding the egress window openings to allow for the installation of shutters or other protective covers, such as plywood, to cover these openings. Although not required, the Department encourages manufacturers to provide the shutters or protective covers and to install receiving devices, sleeves, or anchors for fasteners to be used to secure the shutters or protective covers to the exterior walls. If the manufacturer does not provide shutters or other protective covers to cover these openings, the manufacturer must provide to the homeowner instructions for at least one method of protecting egress window openings. This method must be capable of resisting the design wind pressures specified in § 3280.305 without taking the home out of conformance with the standards in this part. These instructions must be included in the printed instructions that accompany each manufactured home. The instructions shall also indicate whether receiving devices, sleeves, or anchors, for fasteners to be used to secure the shutters or protective covers to the exterior walls, have been installed or provided by the manufacturer.
Substantiation: The HUD standard has not kept pace with these revisions. As a result, Part 3280 cites a 1985 AAMA standard that is obsolete, by virtue of multiple updates and incorporation by reference of obsolete ASTM Standards. The disconnect between the cited standard and current standard creates confusion for both those seeking product certification and for the certifying bodies.
Background
The American Architectural Manufacturers Association (AAMA) has enjoyed a long relationship with HUD and the Manufactured Housing Community, crafting the original fenestration standards cited in Part 3280, Manufactured Home Construction And Safety Standards. As part of the AAMA commitment to continuous maintenance of these and other standards, the AAMA Document Management Committee (DMC) is charged with the responsibility of reviewing our documents and standards annually in order to properly manage their revision. Our Standard Operating Procedures dictate that we review all of our documents that are five or more years old for any revisions that need to be made; this can include updating references, making staff edits, assigning a task group to make minor editorial or major content changes, and in some cases sunsetting documents that have been superseded or otherwise rendered obsolete. AAMA Standard 1704, the Voluntary Standard Egress Window Systems for Utilization in Manufactured Housing, has been part

of this review process since the document was originally published. Since publication of the 1985 version cited in Part 3280, this
standard has been updated three times; in 1995, in 2001 and most recently in 2012.

Summary of Changes from AAMA 1704–85 to AAMA 1704–12

- Various editorial and grammatical changes were made, including the addition of a reference section.
- Updated reference document dates throughout.
- Removed reference to “secondary windows” throughout the document
- Removed old Section 3.2.3, “Removable Secondary Window or Screen”
- Removed general references to removable sashes.
- Inserted language precluding the removal of a window sash in order to effect egress.
- Added option to comply with either ANSI Z34.1 or ISO Guide 65 in Section 6.0
- Updated Figures A4 – A6 to reflect “Removable Interior Mounted Screen”.
- Removed “Fixed One-Lite” diagram from Figure A6

Cost/Benefit Analysis

The industry will benefit from this change from the perspective that current AAMA standards will be referenced and references to obsolete ASTM standards will be corrected. This will allow Fenestration manufacturers to test and certify to standards that are up to date. This will also allow AAMA to sunset obsolete documents.

An industry transition from the AAMA 1704 - 85 standard to the AAMA 1704-12 standard need not cause any turmoil in the industry nor result in undue costs to the manufacturer or supplier. The single substantive change, precluding the removal of a sash to effect egress, has already been addressed by the manufacturing community and the supplier base. This revision took place in the 1995 version and the industry made changes in anticipation of HUD adoption. As the remaining changes to the standard over the years have been substantially editorial, the transition process can be very simple. A 6 month transition period should be sufficient to update certification paperwork and assure that the correct standard date is noted on certification labeling.

We suggest that all products previously tested and certified against AAMA 1704-85 remain acceptable for ongoing use in HUD code homes, contingent on maintaining active status in a third party testing and certification program. (All products currently certified to AAMA 1704-85 will meet all the performance requirements of AAMA 1704-12; however the testing and certification documents cite the ‘95 standard, as that’s what’s called for in the HUD code).

After the adoption of the AAMA 1704-12 standard, new testing and certification activities will be conducted against the new standard and noted as such in test reports and certification documents.

Following the transition period, previous versions of AAMA 1704-12 will be sunsetted and active publication ceased by AAMA in accordance with AAMA policy.

Thank you for your consideration in this matter. If you have any questions, please contact me directly.

3280HUD- Log #83 **Final Action:**
(3280.405)

Submitter: Robert Luter, Kinro, Inc.
Recommendation: We propose that in general § 3280.405 be revised as shown on the attached to reference the newly published AAMA 1702.2–2012 the Voluntary Standard for Swinging Exterior Passage Doors for Utilization in Manufactured Housing; and that § 3280.405(e)(1) specifically be revised to add a reference to ISO Guide 65, the General Requirements for Bodies Operating Product Certification Systems now also referenced in AAMA 1702.2-12.

Proposed Revisions
§ 3280.405 Standard for Swinging Exterior Passage Doors for use in Manufactured Homes.
(a) Introduction. This standard applies to all exterior passage door units, excluding sliding doors and doors used for access to utilities and compartments. This standard applies only to the door and the attached door or doors.
(b) Performance Requirements. The design and construction of exterior door units must meet all requirements of AAMA 1702.2–12 ~~AAMA 1702.2–95~~, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing.
(c) Materials and Methods. Any material or method of construction shall conform to the performance requirements as outlined in Paragraph (b) of this section. Plywood shall be exterior type and preservative treated in accordance with NWWDA I.S.4–81, Water Repellent Preservative Non-Pressure Treatment for Millwork.
(d) Exterior Doors. All swinging exterior doors shall be installed in a manner which allows proper operation and provides protection against the elements (see § 3280.307).
(e) Certification. All swinging exterior doors to be installed in manufactured homes must be certified as complying with AAMA 1702.2-12 ~~AAMA 1702.2–95~~, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing.
(1) All such doors must show evidence of certification by affixing a quality certification label to the product in accordance with ANSI Z34.1–1993, Third Party Certification Programs for Products, Processes, and Services or ISO Guide 65, General Requirements for Bodies Operating Product Certification Systems.
(2) In determining certifiability of the products, an independent quality assurance agency must conduct a preproduction specimen test in accordance with AAMA 1702.2-12 ~~AAMA 1702.2–95~~, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing.
(f) Protection of Exterior Doors in High Wind Areas. For homes designed to be located in Wind Zones II and III, manufacturers shall design exterior walls surrounding the exterior door openings to allow for the installation of shutters or other protective covers, such as plywood, to cover these openings. Although not required, the Department encourages manufacturers to provide the shutters or protective covers and to install receiving devices, sleeves, or anchors for fasteners to be used to secure the shutters or protective covers to the exterior walls. If the manufacturer does not provide shutters or other protective covers to cover these openings, the manufacturer must provide to the homeowner instructions for at least one method of protecting exterior door openings. This method must be capable of resisting the design wind pressures specified in § 3280.305 without taking the home out of conformance with the standards in this part. These instructions must be included in the printed instructions that accompany each manufactured home. The instructions shall also indicate whether receiving devices, sleeves, or anchors, for fasteners to be used to secure the shutters or protective covers to the exterior walls, have been installed or provided by the manufacturer.
Substantiation: The HUD standard has not kept pace with these revisions. As a result, Part 3280 cites a 1995 AAMA standard that is obsolete, by virtue of multiple updates and incorporation by reference of obsolete ASTM Standards. The disconnect between the cited standard and current standard creates confusion for both those seeking product certification and for the certifying bodies.

Background
The American Architectural Manufacturers Association (AAMA) has enjoyed a long relationship with HUD and the Manufactured Housing Community, crafting the original fenestration standards cited in Part 3280, Manufactured Home Construction And Safety Standards. As part of the AAMA commitment to continuous maintenance of these and other standards, the AAMA Document Management Committee (DMC) is charged with the responsibility of reviewing our documents and standards annually in order to properly manage their revision. Our Standard Operating Procedures dictate that we review all of our documents that are five or more years old for any revisions that need to be made; this can include updating references, making staff edits, assigning a task group to make minor editorial or major content

changes, and in some cases sunsetting documents that have been superseded or otherwise rendered obsolete.

AAMA Standard 1702.2, the Voluntary Standard for Swinging Exterior Passage Doors for Utilization in Manufactured Housing, has been part of this review process since the document was originally published. Since publication of the 1995 version cited in Part 3280, this standard has been updated twice; first in 2002 and most recently in 2012.

Summary of Changes from AAMA 1702.2–95 to AAMA 1702.2–12

- Various editorial changes were made.
- Updated reference document dates throughout.
- Added option to comply to either ANSI Z34.1 or ISO Guide 65 in Section 1.3.
- Added requirement for sealants to “meet or exceed AAMA 803.3” in Section 4.1.4.
- Removed reference to AAMA 613, 614 and 615 in Section 7.1
- Updated Figures C1 – C8

Cost/Benefit Analysis

The industry will benefit from this change from the perspective that current AAMA standards will be referenced. This will allow Fenestration manufacturers to test and certify to standards that are up to date. This will also allow AAMA to sunset obsolete documents.

An industry transition from the AAMA 1702.2–95 standard to the AAMA 1702.2-12 standard need not cause any turmoil in the industry nor result in undue costs to the manufacturer or supplier. As the changes to the standard over the years have been substantially editorial, the transition process can be very simple and has precedent. A 6 month transition period should be sufficient to update certification paperwork and assure that the correct standard date is noted on certification labeling.

We suggest that all products previously tested and certified against AAMA 1702.2-95 remain acceptable for ongoing use in HUD code homes, contingent on maintaining active status in a third party testing and certification program. (All products currently certified to AAMA 1702.2-95 will meet all the performance requirements of AAMA 1702.2-12; however the testing and certification documents cite the ‘95 standard, as that’s what’s called for in the HUD code).

After the adoption of the AAMA 1702.2-12 standard, new testing and certification activities will be conducted against the new standard and noted as such in test reports and certification documents.

Following the transition period, previous versions of AAMA 1702.2 will be sunsetted and active publication ceased by AAMA in accordance with AAMA policy.

Thank you for your consideration in this matter. If you have any questions, please contact me directly.

3285HUD- Log #1 Final Action:
(Entire Document)

Submitter: Boone Smith Morris, Pompano Beach, FL
Recommendation: Standard test methods for establishing load assistance design values of Alternative Foundation Systems used for Manufactured Home Installations.
Substantiation: There currently exists no “approved” test protocol for alternative foundation systems. A standards subcommittee is working on a ground anchor test protocol, and this is a necessary addition to that project. Existing tests on alternative systems vary widely in test loads and methodology, and guidance is needed in order to provide uniformity. This would provide assurance to DAPIAs, home manufacturers and consumers that proper testing has been accomplished.
Note: Supporting material is available for review at NFPA Headquarters.
This is not original material; its reference/source is as follows:
K2 Engineering