Manufactured Housing Consensus Committee
General Subcommittee
Conference Call
9-20-11

Roll Call

General Subcommittee Members:	
Steve Anderson	Y
Kevin Jewell	Y
Mike Lubliner	Y
Mark Mazz	Y
Leo Poggione	Y
Theresa Desfosses	Y
Bill Stamer	Y
Greg Scott	Y
Tim King	Y
Mark Luttich	N
Dave Tompos	Y
Administrative Organization:	
Joe Nebbia, Newport Partners	Y
HUD:	
Jim Everett (DFO)	Y
Others:	
Lois Starkey, MHI	Y
Mark Weiss	Y

Highlights and Action Items

- Subcommittee approved the 4-14-11 minutes. (unanimous)
- Subcommittee recommends approval as modified to the full committee on Log#2 (8-1-1)
- Subcommittee recommends approval as modified to the full committee on Log#3 (9-1)
- Subcommittee recommends rejection to the full committee on Log#10 (unanimous)
- Subcommittee recommends rejection to the full committee on Log#11 (unanimous)
- Mr. Poggione to find cost data and bring to the full committee meeting for discussion on Log#3
- Request for General Subcommittee members to send 50-100 word comments on Log#3 to summarize their positions for the benefit of the full committee.

Published Agenda

1. Adjustments to the Agenda (5 minutes)
2. Review Minutes of April 14, 2011 Conference Call (5 minutes)
3. Log #3: Increasing exterior swinging door width (15 minutes)
4. Log #11: Increasing the clear opening of exterior sliding door width (15 minutes)
5. Log #2: Increasing the hallway width (15 minutes)
6. Log #10: Requiring a minimum ceiling height to 7'-0" (5 minutes)

7. Statements/Thoughts of each Subcommittee member (25 minutes)
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Subcommittee discussion:
The meeting was called to order at 1:03 p.m. eastern time.

1. Adjustments to the Agenda

Mr. Weiss, MHARR made a request for public comment time to be added to the agenda. It was agreed to add 5 minutes for public comments after adjustments to the agenda, and 5 more minutes for public comments at the end of the meeting.

2. Public Comment:

Mr. Weiss, MHARR, provided public comment. He stated that the MHARR position on accessibility has been consistent. 2011 production is 10% below last year, which was near historic lows. He stated that now is not time to impose new mandates. Secondly, there is the issue of cost. He expressed that there has been discussion of cost but no real presentation of data. If there is no cost info the subcommittee shouldn't be active on these things. Mr. Weiss urged the Subcommittee not to move forward.

3. Review Minutes of April 14, 2011 Conference Call
   - No additions or changes were made to the minutes.
   - **Mr. Anderson made a motion to approve the minutes. Mr. Poggione seconded.**
   - **Vote: Unanimous approval**

4. Log #3: Increasing exterior swinging door width
   - The Subcommittee discussed log# 3. Currently there is a minimum requirement of 28" opening for exterior doors. The Recommendation in log#3 is to require all exterior swinging doors to have a minimum 32" wide by 72" high clear opening. Sliding doors would have a minimum 32" and 72" wide clear. Discussion on previous calls was to just make the exterior doors 32" wide.

   - There was a comment that industry is at all time low and this item should be left as a consumer choice. There were questions raised about the listed cost of the change ($15 per door). Several subcommittee producer category) members indicated that The price of $15 is extremely under estimated.

   - There was a request from a subcommittee member for documentation that it would cost more than $15. The response was that there was no data, just personal knowledge of the industry. .

   - One subcommittee member (producer category) indicated that simply changing the style of door, would be an increase of $100.

   - There was a question from a subcommittee member (user category) on the breakdown of costs between fixed design costs, and material costs. There was a response that it would be an immediate imposition of cost based on third party approval of the design. It would have to be approved by each third party (30 minutes for each). It could be $200 a door.

- There was a question on whether there was a rule of thumb for amortizing costs? Response – amortize by the model.

- There was a question on how many models would have to change? Estimate – well over 1000 models. It changes regionally. Every factory has multiple floor plans.

- There was discussion over whether looking at option costs was appropriate because as a requirement, it would be standard practice and no longer an option.

- There was a comment by a subcommittee member (user category) that competitiveness should take care of this. At Home Depot you can get a door that has 4 more inches for $15. There was a response that the Manufactured Housing industry is not Home Depot.

- There was a question from a subcommittee member (user category) about whether people would change votes the language was changed to one exterior door instead of all.

- There was agreement from several subcommittee members that they could vote for the proposal if it was one door.

- **Mr. Jewell made a motion to amend the language being considered to read: *One exterior door shall provide a minimum opening 32" wide by 74" high clear opening.* Mr. Anderson Seconded.**
- **Vote: Unanimous approval [Note: this motion amended the language of the proposal being considered only]**

- There was a question on how many homes have at least one exterior door. Response – we have 32" in northeast but not clear opening.

- There was a comment from a subcommittee member (general category) that they had never seen a model in the northeast that did not offer an option for a 36" door.

- There was a comment that it's ridiculous to not offer a 32" clear opening when all other model codes have this as a requirement.

- There was a comment from a subcommittee member (producer category) that, on the Home Depot web site there is at least $60 difference. There was further comment that there was no substantiation for $15 price. There was a response from another subcommittee member that there were doors on the Home Depot website that showed no price difference at all.

- There was discussion on whether a 34" door provides a 32" clear opening? Answer – not always; it depends on the thickness of the door.

- There was a comment from a subcommittee member (producer category) that just because an option is available on paper doesn't mean it has been built yet, and that there could still be engineering costs involved.

- There was a request for anyone has cost information that provides different cost data than what the subcommittee currently has? Mr. Poggione volunteered to find information and bring it to the full committee meeting.

- There was a comment from a subcommittee member (producer category) that an option point cost would be $100 and the retailer could mark-up could be 0-20%.

- **Mr. Jewell made a motion to amend the cost-benefit language to read: *the cost of installing larger doors will range from $0-$100 per door to the dealer, if installed during factory assembly; plus a onetime design and review fee per model of $150-300.* Mr. Anderson seconded.**

- Discussion:
    - There was a question on what the urgency of these votes are when the full committee will be meeting in person in a month. Response – efficiency in government, and no reason to stall. Another response was that passing a change now would give the full committee more time to consider it.

Roll Call Vote to amend the cost justification in the proposal Passes 6-4	
Steve Anderson	Y
Kevin Jewell	Y
Mike Lubliner	Y
Mark Mazz	Y
Leo Poggione	N
Theresa Desfosses	N
Bill Stamer	N
Greg Scott	N
Tim King	Y
Mark Luttich	
Dave Tompos	Y

[Note: this roll call vote amended the cost justification information in the proposal only]

- This roll call vote ended discussion on the cost justification information.

- **Mr. Anderson made a motion to recommend approval of Log#3 as modified – along with the modified cost justification language – to the full committee. Mr. Jewell seconded.**
    - **The proposal as modified reads: *One exterior door shall provide a minimum opening 32" wide by 74" high clear opening.***
        - **Cost justification as modified reads: *The cost of installing larger doors will range from $0-$100 per door to the dealer, if installed during factory assembly; plus a onetime design and review fee per model of $150-300.***

Roll Call Vote Passed 9-1 to recommend approval of Log#3 as modified	
Steve Anderson	Y
Kevin Jewell	Y
Mike Lubliner	Y
Mark Mazz	Y

Leo Poggione	Y
Theresa Desfosses	N
Bill Stamer	Y
Greg Scott	Y
Tim King	Y
Mark Luttich	
Dave Tompos	Y

- There was a request for subcommittee members to send 50-100 word comments to the subcommittee chair on log#3 to summarize their positions for the benefit of the full committee.

5. Log #11: Increasing the clear opening of exterior sliding door width

- Log#11 addresses all exterior sliding doors being 28" to 32" wide. The discussion during the previous meeting was that exterior an swinging door was the norm. There was one commenter that stated they had never seen a sliding entry door.

- **Mr. King made a motion to recommend rejection to the full committee. Reason – entrance accessibility has been addressed through subcommittee action on log#3. Mr. Tompos seconded.**
- **Vote: Unanimous approval to recommend rejection.**

6. Log #2: Increasing the hallway width

- The recommendation would increase the minimum hallway width from 28" to 30". In past discussion there was a comment that one producer builds 42 inch" hallways. Another commented that 36" was the narrowest they built. Another commented that in 14' wide model, 36" would create a problem.

- There was a comment from a subcommittee member that, looking at plans, they cannot find anything smaller than 30. There was a response that in some communities 10', 12' and 14' wide would be eliminated. Variety would be eliminated from customers' options.

- There was a question from a subcommittee member on what percent of homes the change would eliminate? Response – 100% of 10' wide and 12' wide.

- There was a suggestion to change the language to only apply to 14' wide models and wider.

- A subcommittee member (user category) expressed concern over narrower hallways for fire reasons.

- There was a comment from a subcommittee member (general category) that 14' wide is to the eaves, and that the language needs to be specific about the floor space being covered. There was a suggestion by a subcommittee member to specify from exterior wall to exterior wall.

- There was discussion on whether a change like this should wait until the industry picks up. There was further discussion on whether such a change would go into effect now or

in 3 years. There was further discussion of whether rules should be created for the immediate state of the industry or for the next 15 to 25 years, and whether or not predictions of what will be needed are possible.

- There was discussion of whether to change the requirement to 36" inch for multi-section units.

- There was a comment from a subcommittee member that the group does not have enough information to be comfortable with the 36" wide requirement.

- **Mr. Jewell made a motion to amend the language of the proposal to read: *Hallways for homes 14' wide, as measured from exterior wall to exterior wall, or larger shall have a minimum horizontal dimension of 30 inches (762 mm) measured from the interior finished surface to the opposite wall.* Mr. Tompos seconded.**

- Discussion:
    - There was a suggestion to address width issue at full committee. Questions of whether a 14' wide unit should actually read 13' to account for the eaves.

- **Vote: motion passes 8-1-1 (Desfosses – no; King – Abstain) [Note: This motion amended the language of the proposal only]**

- There was a statement from a subcommittee member (user category) that he planned to introduce the idea of a 36" minimum for multi-wide units as a possible amendment during the full committee meeting.

- There was a comment from a subcommittee member (user category) that there is also an issue of disclosure of the limitations of units with narrower hallways to the customer.

- There was a comment from a subcommittee member (producer category) that that the committee doesn't seem to understand how hurting the industry is. There was a response from a subcommittee member (user category) that the only way for the industry to survive is to re-invent itself. There was further comment that the industry was hurting and that it is not all the fault of the manufacturers.

- **Mr. Jewell made a motion to recommend approval of Log#2 as modified to the full committee. Motion seconded.**

    - **Proposal as modified reads: *Hallways for homes 14' wide, as measured from exterior wall to exterior wall, or larger shall have a minimum horizontal dimension of 30 inches (762 mm) measured from the interior finished surface to the opposite wall.***

- **Vote: Motion to approve Log#2 as modified passed 8-1-1 (Desfosses – No; King – Abstain)**

7. Log #10: Requiring a minimum ceiling height to 7'-0" (5 minutes)
    - During the last meeting, no one thought this was an issue that needed to be addressed.

- **Mr. Jewell made a motion to recommend rejection to the full committee. Reasoning – change not justified. Ms. Desfosses seconded.**
- **Vote: Unanimous approval.**

8. Public comment

- Mr. Weiss, MHARR, provided public comment. He made a general comment that the notion that proponents can come forward with any number in cost without any documentation and it's up to opponents to debunk the numbers is wrong. The burden of proof is on the proponent of a proposal. Mr. Weiss plans to address this issue again at the October meetings.

- Ms. Starkey, MHI, provided public comment. MHI's position on the original proposals has been that they would like to see them as voluntary standards. She referenced a study in Canada, that indicated 80% of population of home buyers will be older than 55. Proponents have been reasonable in pulling back on original proposals/positions on various issues. MHI appreciates that.

9. Statements/Thoughts of each Subcommittee member

- Mr. Jewell stated expressed appreciation for everyone's dedication to process. The proposals were put forward many years ago, and it's nice to get movement on them. He expressed disappointment that they didn't have the votes for 36" hallways in double wides but expressed hope that the change would pass at the full committee.

- Mr. Lubliner expressed agreement with Mr. Jewell's comments.

- Mr. Mazz stated that the 30" corridor is still narrower than many wheel chairs, but that getting 2 inches is better than nothing.

- **There was a motion to adjourn Motion to adjourn and a second. Unanimous Approval.**