

MANUFACTURED HOUSING CONSENSUS COMMITTEE (MHCC) – SAMPLE PROPOSAL FORM

For further information on the MHCC, please contact the Office of Manufactured Housing Programs at (202) 708-6423 or via email at mhcc@hud.gov

FOR OFFICE USE ONLY

Log #: _____

Date Rec'd: _____

Date 6/6/2014 Name Steve Anderson Tel. No. (208) 646-2017

Company N/A

Street Address 129 North 3rd East City Franklin State ID Zip 83237-5063

Please Indicate Organization Represented (if any) N/A

1. a) MHCC Document Title/CFR Section Title _____
 b) Section/Paragraph 3280.112

2. Proposal recommends: (check one) new text revised text deleted text

3. Proposal (include proposed new or revised wording, or identification or wording to be deleted): (Note: Proposed text should be in legislative format: i.e. use underscore to denote wording to be inserted (inserted wording) and strike through to denote wording to be deleted (~~deleted wording~~). Hallways shall have a minimum horizontal dimension of 28 36 inches measured from the interior finished surface to the interior finished surface of the opposite wall. When appliances are installed in a laundry area, the measurement shall be from the front of the appliance to the opposite finished interior surface. When appliances are not installed and a laundry area is provided, the area shall have a minimum clear depth of 27 35 inches in addition to the 28 36 inches required for passage. In addition, a notice of the available clearance for washer/dryer units shall be posted in the laundry area. Minor protrusions into the minimum hallway width by doorknobs, trim, smoke alarms or light fixtures are permitted.

4. Statement of Problem and Substantiation for Proposal: (Note: State the problem that will be resolved by your recommendation; give the specific reason for your proposal including copies of tests, research papers, experience, etc. Provide a cost/benefit review of your recommendation. If more than 200 words, it may be abstracted for publication. The justification has nothing to do with cost. It has everything to do with fire safety. Basic physics teach us that the narrowed the hallway, the greater the velocity. This means that there is a greater chance of the chimney effect occurring in homes with narrower hallways than with wider hallways. It also impacts the performance of smoke alarms. In the 10/23/2010 report from the NFPA, entitled "Smoke Alarm Presence and Performance in US homes, it states, "narrow hallways also reduce the volume of the signal (smoke alarms)." Most building codes recognize these factors by enlarging hallway widths. Most local building codes require hallway widths to be from 36" to 48". The narrowest found is 32". On most newer homes, the requirement is 42" to 48".

5. This Proposal is original material. (Note: Original material is considered to be the submitter's own idea based on or as a result of his/her own experience, thought, or research and, to the best of his/her knowledge, is not copied from another source.) Yes!

- This Proposal is not original material, its source (if known) is as follows: _____

6. Cost/Benefit Information. The Proposal must include a statement as to whether the proposed change would result in an increased cost, and if so, how much of an increase. The benefit to be gained if the proposed change is implemented in the manufactured housing program document must also be described. This proposal does not pretend to be of any financial benefit – with regards to cost savings in the construction of the homes. Instead, the benefit comes from making the homes safer and the potential loss of life lessened. The question regarding cost savings comes from the problem of defining the worth of human life. To me, the cost is high – others have a different point of view.

7. All proposals submitted for consideration by the MHCC must be presented in a format showing existing language (if applicable) with proposed deletions ~~stricken out~~, and proposed additions in underlined letters. In addition, all proposals shall include a statement of what the proposal is trying to achieve.

8. All proposed changes for consideration by the MHCC must be submitted to the Administering Organization (AO). The AO will then do one of the following within 7 business days of receipt:
- If the proposal is in the correct format specified in #7 above, forward it to all members of the MHCC.
 - If the proposal is not the correct format as specified in #7 above return it to the person who submitted it with instructions for proper formatting.
9. The Chair of the MHCC shall assign all proposed changed to a subcommittee for consideration.

I hereby grant the U.S. Department of Housing and Urban Development all and full rights in copyright, in this proposal, and I understand that I acquire no rights in any publication of HUD in which this proposal in this or another similar or analogous form is used.

Signature (Required) Steve Anderson

PLEASE USE SEPARATE FORM FOR EACH PROPOSED CHANGE * HUD Fax: (202) 708-4213

Send to: U. S. Department of Housing and Urban Development
451 7 Seventh Street, SW, Room 9168
Washington, DC 20410-8000
Email: mhcc@hud.gov

INSTRUCTIONS FOR SUBMITTING PROPOSALS ON MHCC DOCUMENTS

Use a separate proposal form for submitting each proposed amendment.

- Type or print in black ink.
- Indicate the number, edition year, and title of the document or regulation. Also indicated the specific section or paragraph that the proposed amendment applies to.
- Check the appropriate box to indicate whether this proposal recommends adding new text, revising existing text, or deleting text.
- In the space identified as "Proposal" indicate the exact wording you propose as new or revised text, or the text you propose to be deleted.
- In the space titled "Statement of Problem and Substantiation for Proposal" state the problems that will be resolved by your recommendation and give the specific reason for your proposal. Include copies of test results, research papers, experience, cost/benefit information, or other materials that substantiate your recommendation.
- Check the appropriate box to indicate whether or not this proposal is original material, and if it is not, indicate the source of the material.
- Sign the proposal.

If supplementary material (*photographs, diagrams, reports, etc.*) is included, you may be required to submit sufficient copies for all members of the MHCC. The MHCC is authorized to abstract the "Statement of Problem and Substantiation for Proposal: if it exceeds 200 words for publication in the Federal Register.