



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-8000

OFFICE OF HOUSING

May 22, 2014

**MEMORANDUM:** All Primary Inspection Agencies and State Administrative Agencies

**FROM:**

Pamela Beck Danner, Administrator  
Office of Manufactured Housing Programs

A handwritten signature in cursive script, appearing to read "Pamela Beck Danner".

**SUBJECT:**

Test of Surface Burning Characteristics of Building Materials,  
24 CFR § 3280.207(a)

Test for Surface Burning

This is in response to a request for clarification regarding the applicability of NFPA 255-1996, Standard Method of Test of Surface Burning Characteristics of Building Materials, for flame spread and smoke developed limitations. This standard was incorporated by reference and included as the test protocol for evaluating surface burning of building materials in 24 CFR §3280.207(a) in the December 9, 2013, revisions to the Manufactured Home Construction and Safety Standards (Standards).

We have recently been made aware of another Standard, ASTM E84-2014 Edition, Standard Test Method for Surface Burning Characteristics of Building Materials that would be directly applicable to this requirement. In addition, information provided to the Department indicates that most third party certifications as to the burning characteristics of building materials as being made to the ASTM E84 Standard and not to NFPA 255 Standard.

In view of the above, the Department will accept certification made to either the NFPA 255-1996 or ASTM E84 with regard to the Method of Test of Surface Burning Characteristics of Building Materials required by 24 CFR 3280.207(a) of the Standards.

In summary, we find the NFPA 255-1996 to be an acceptable test method for evaluating surface burning characteristics of building materials under 24 CFR § 3280.207(a) of the Standards and will accept certification to the ASTM E84 Standard or to NFPA 255-1996 Standard until such time that future recommendations to revise the Standards can be duly considered and acted upon by the Manufactured Housing Consensus Committee and the Department.