



Draft Minutes
HUD Manufactured Housing Consensus Committee
Holiday Inn
Arlington, VA
July 28-30, 2009

Tuesday, July 28

1. DFO Matchneer announced that this is a meeting of the Manufactured Housing Consensus Committee. Chairwoman Brenton called the meeting to order. Mr. Solomon called the roll; a quorum was present. Ms. Brenton announced that the agenda has been modified to include a report from DOE on its energy conservation activity related to manufactured housing at the start of the Thursday morning session.

Mr. Matchneer introduced Mr. Jim Everett who has replaced Ms. Dickerson in the HUD management of the program. He also introduced new MHCC members Messrs. Sheahan, Walter, Wade and Jewell. Messrs. Jewell, Sheahan, and Walter are General Interest members, Mr. Wade is a Producer. Mr. Matchneer noted that Mr. Farish will continue as a member of the Committee as a Producer member

Mr. Ghorbani asked about the minutes of the past meeting and conference calls. Ms. Brenton indicated that copies are being distributed for Committee review. Approval will be in the Thursday morning session of the Committee.

The agenda was further modified to allow more time for review and discussion of the draft proposed PIA rule. The agenda, as modified, was approved.

2. Mr. Matchneer stated that the Charter and Bylaws are still a work in progress within the Department and there will be no action at this meeting. Mr. Ghorbani noted that the May 2009 minutes are important for the discussion of the MHCC Charter and Bylaws. Mr. Ghorbani stated that it is important for the Committee to protect its rights and privileges under the MHIA 2000.

Mr. Matchneer reported that Mr. David Stevens has been appointed Housing Commissioner. Mr. Stevens is a former executive with Long and Foster.

Mr. Matchneer noted that the manufactured housing program has transformed its focus to quality assurance and quality control rather than one of "counting defects". IBTS will be "consulting" with manufacturers regarding QA and QC. Consultations have been held in about 30 facilities and so far have been very well received.

Mr. Matchneer reported that six rule packages are at the Office of the General Counsel. He recognized that the Committee and HUD staff have put a lot of work into these documents. However, the new Administration is reviewing all proposals, not just HUD's, before they are released for publication in the Federal Register. Among the rules are the second set of standards, the on-site rule, the truss rule, Subpart I, and the third set of standards. He expressed hope that the rules clear the process soon.

Mr. Matchneer noted that Mr. Everett is working with GSA and HUD to get the MHCC Charter and Bylaws in line with FACA, particularly the Subcommittee and Task Group operating practices.

Mr. Matchneer reported that 33 states have applied to run a manufactured housing program; 22 have been approved.

Mr. Matchneer reported that the manufactured housing program has received a direct appropriation which allows the program to directly contract with states to implement a state plan.

Mr. Matchneer noted that personnel from other Agencies have volunteered to assist with the Dispute Resolution program. He noted that the program has yet to be used. The Department is working on a contract to provide services for the program.

Mr. Ghorbani asked what the Department can do to help states with implementing installation programs. He asked whether the Congress should be approached about recodifying installation. Mr. Matchneer stated that the language is clear that there is no preemption. He noted that HUD cannot implement a regulatory requirement, a statutory revision would be necessary. Mr. Gorman noted that his experience at the state level would encourage support for preemption. He also noted that localities have used foundation requirements that price manufactured housing out of the area. Mr. Vogt noted that some building codes have also had the same effect.

Mr. Lubliner asked what HUD's role is on sustainability. Ms. Cocke noted that energy is an area of involvement although DOE has the lead and HUD has not been formally approached by DOE.

Mr. Luttich noted that Nebraska, South Dakota, Wyoming and Missouri had discussed creating a regional installation authority. Ms. Cocke noted that it presented enforcement issues and legal issues and in the end it was not able to be put together. Each state would have had to vote to give up its authority in this area. Mr. Jewell stated that there should be a Federal floor but not be preemptive.

Ms. Defosses asked whether there were funds or grants to help states. Mr. Matchneer indicated that there were not although states are helped through label fees. Mr. Vogt noted that states do help neighboring states. Mr. Lubliner expressed a concern that HUD does not have enough funds for the manufactured housing program. Mr. Lubliner noted that the Washington state budget for manufactured housing has been substantially cut.

Mr. Lagano moved that the issue be referred to the Regulatory Enforcement Subcommittee to draft a position for consideration by the MHCC; Mr. Gorman seconded. Mr. Ghorbani recommended that Subcommittee give consideration to recommending HUD guidelines for programs and to research whether there is discrimination in local requirements. Ms. Brenton stated that the Subcommittee should draft a fact-based position. Ms. Cocke stated that it is outside the purview of the MHCC to consider legislative activity. Such discussions should be conducted outside of the MHCC. Mr. Ghorbani offered a friendly amendment to indicate that the draft was for the MHCC and not for legislative action. Amendment accepted. Mr. Lagano indicated that the draft not be a "policy" but rather a report on progress and feedback. Mr. Lubliner is interested in the costs to states to implement installation programs. Mr. Gorman is interested in gathering facts on where local foundation requirements have effectively "zoned out" manufactured homes from an area. Mr. Weinert noted that California passed legislation to prohibit discriminatory zoning. Motion, as amended, failed, 6 in favor, 8 opposed.

3. Mr. Everett reported that under FACA the MHCC Charter will be up for review next year. The

new administration is reviewing the ethics and conflict of interest rules that apply to all 1000 or so Federal Advisory Committees, including the MHCC.

He also noted a new House bill, H.R. 1320, *To amend the Federal Advisory Committee Act to increase the transparency and accountability of Federal Advisory Committees*. He noted that among the provisions is a requirement to provide a transcript of Committee proceedings, record members participating and guest comments. Records would be kept in the National Archives. There is no indication of activity on the bill, although it has received some support.

He also reported that HUD will be appointing an Advisory Committee Officer. HUD is behind other agencies in this respect.

4. Mr. Everett introduced Mr. Michael Kirkpatrick who made a presentation on FACA and Federal Advisory Committees. Mr. Kirkpatrick is from the Litigation Group of Public Citizen. Public Citizen is a national, nonprofit consumer advocacy organization founded in 1971 to represent consumer interests in Congress, the executive branch and the courts. The Litigation Group is an advocate of open government, including operation of Federal Advisory Committees. He noted that Public Citizen has litigated two cases at the Supreme Court regarding Federal Advisory Committees. He noted that the goal is to end domination by special interests and encourage openness.

Mr. Ghorbani asked if Mr. Kirkpatrick was familiar with the history of the MHCC, the MHIA 2000 and the role of FACA. Mr. Kirkpatrick noted that the MHIA 2000 required the MHCC be balanced among producers, public interest, and consumers. He encouraged everyone to participate and to be active and engaged. He noted that the Committee must avoid even the appearance of unfairness. Minutes should be reviewed and reflect all points of view expressed. Committees develop better recommendations if there is balance, debate and dissent. Dissenters should explain their reasons for dissent. Mr. Zieman asked whether the same requirements apply to Subcommittees and Task Forces. Mr. Kirkpatrick indicated not necessarily but Subcommittees should be balanced.

Ms. Brenton thanked Mr. Kirkpatrick for his comments.

5. Ms. Brenton lead a discussion of the draft proposed PIA rule. Mr. Ghorbani stated that the package is not complete as cost information is not included. It is difficult for the MHCC to vote on a proposal that is not complete. Mr. Solomon noted that the Committee must submit its comments to the Secretary by September 8, 2009, so there is not much time to complete the review. Mr. Matchneer noted that there is limited time for follow-up conference calls. Ms. Nelson echoed Mr. Ghorbani's comment about the package being incomplete. Mr. Weinert noted that the publication of the proposal will contain the cost information. Mr. Ghorbani stated that the review should proceed. Ms. Brenton recommended that the MHCC comments include

a statement that the Committee did not have the opportunity to review the entire package. Ms. Nelson concurred. Mr. Lubliner asked whether cost information would be limited to first cost without consideration of lifetime cost and maintenance costs.

Mr. Matchneer noted that the emphasis of the program has been changed from “30 years of counting defects” to emphasizing quality programs. The HUD label signifies the home complies with the standards. He noted that quality emphasis is considered the best way to ensure such. He stated that the new emphasis has been well received in those facilities where it has been implemented. Mr. Ghorbani expressed a concern that this proposal is based on an experience with one plant rather than a systematic review. He also noted that the cost of compliance needed to be evaluated for its effect on the consumer and be justified. He reiterated that it is difficult to evaluate the draft proposal because costs and justification is not included. Mr. Lubliner noted that his personal experience with refinancing would suggest that a proper quality assurance program would help improve the image of manufactured homes with lenders. Mr. Weinert stated that it would be incorrect to characterize this issue as a result of a rogue facility. By correcting that situation all facilities in the state were improved. Mr. Gorman stated that it is important to know how the cost of this proposal would impact the consumer’s ability to pay for a home.

Mr. Matchneer stated that cost and justification will be considered in the rulemaking process. He also noted that the MHCC has worked on several rules that did not contain formal cost estimates in advance of MHCC consideration. He did note that one IPIA reported that the cost for conducting the consultation in one facility was about \$2000. Another estimate was \$500. Both would be one time costs. It is not clear how to factor this cost into the number of homes produced. He noted that the program would have a two year trial and then would be assessed. He indicated that the Committee was welcome to include an overall statement regarding the absence of cost information but he encouraged the Committee to take this opportunity to submit comments. Mr. Gorman noted that the costs mentioned were separate from the requirements in the draft proposal. Mr. Matchneer concurred. Mr. Gorman stated that it is the costs of implementing the proposal that are being sought.

Mr. Luttich indicated that he is lukewarm about the quality assurance approach. Facilities currently have QA manuals but some choose not to follow them. He asked what the hammer is. Mr. Matchneer indicated that there could be a heavy fine assessed. Mr. Lubliner indicated that he would like to see energy efficiency and durability included in the definition of quality assurance.

Mr. Zieman stated that this discussion of a quality assurance initiative is not related to the document being considered. He suggested that HUD indicate the justification for elements of the proposal as we go through it. He also noted that while it would be nice to have costs, absence of cost data has not precluded the MHCC from acting in the past and that subjective estimates could be made.

6. The Committee reviewed the draft proposal. Numerous editorial or clarifying changes were recommended. Discussion of specific significant items or controversial items follows.

3282.7 Traveler: Mr. Luttich suggested that requiring a *Traveler* might preclude innovation, something better may come along. Mr. Vogt agreed that a traveler was not necessary. It was noted the activity record in a traveler is addressed in 3282.362(b)(1)(i). *Traveler* to be deleted.

Red tag: There was a discussion of what red tag actually means. “Affix” was changed to

“provide” and it was clarified that only uncorrected issues needed to have a red tag.

3282.202(b) Mr. Stamer questioned why copies of contracts should be sent to the Secretary. Mr. Weinert indicated that the HUD review could prevent conflicts of interest and ensure that the contract complied with all laws and regulations. Mr. Stamer noted that PIAs are under the control of HUD so it should not be necessary. Mr. Luttich noted that review would identify manufacturers that change IPIAs frequently. It was agreed that “contract or other agreement” should be changed to “statement of work”.

3282.202(d)(1) There was a discussion and debate as to whether the manufacturer should receive a copy of the transfer notice and explanation of the circumstances that lead to a transfer to a new PIA. It was moved, seconded and carried 9-6 that a manufacturer should receive a copy. Those opposed expressed the view that it was not necessary.

3282.202(d)(2) There was a discussion of what information should be passed on to the new PIA.

3282.203 (c)(6)(v) – Delete, management function

3282.204 There was a general discussion of the responsibility and services of the IPIAs. It was noted that in the past PIAs were sometimes incorrectly viewed as guarantors. Mr. Zieman noted that PIAs verify the manufacturers are capable of producing homes that conform to the standard. When the IPIA identifies a problem it is brought to the attention of the manufacturer. Ms. Nelson asked what happens after the manufacturer is notified. Mr. Zieman indicated that the IPIAs responsibility ends. Mr. Weiss noted that the Act does not address follow-up. Mr. Vogt noted the role of the SAA in the process. Mr. Pethel noted that the IPIA would need to reevaluate the manufacturer’s QA program. Mr. Zieman stated that the proposal imposes new responsibilities on the PIAs.

3282.204(b) There was a discussion as to whether the IPIA should be evaluating the manufacturer’s personnel. It was moved seconded and carried that “personnel” be deleted; Weinert opposed.

3282.204(e) There was a discussion of the words “or reason to know”. It was decided that “knows or reason to know” be changed to “determines”. It was mentioned that this duplicates requirements in 3282.404. Mr. Weinert noted that it allows the IPIA to be involved at the earliest possible point for correcting the problem. Mr. Braun moved that the paragraph be accepted as written. Motion seconded but failed to pass. Mr. Luttich noted that if an IPIA finds a non-conformance he normally checks whether there are others. Ms. Defosses moved that the entire paragraph be deleted. Motion seconded but failed to pass in a tie vote, 8-8.

The Committee recessed for the day at 5:00 p.m.

Wednesday, July 29, 2009

The Committee reconvened at 10:30 a.m.

7. Mr. Lagano asked about the status of ground anchor testing. He noted that the project has been on hold for over a year. Mr. Mendlen reported that a new contract with Jay Crandall will be let soon to evaluate the draft protocol developed by the MHCC. It was noted that the prior testing project was inconclusive, although it was not intended as an evaluation of the protocol. It was decided that the project should remain as a full Committee project rather than return it to the Subcommittee.

Mr. Matchneer reported that Mr. Tom Rodgers from "Gassing America" will be making a presentation during the public comment period. Mr. Rodgers is raising concerns regarding the placement of a fresh air intake vent within 3 feet of an exhaust vent which may permit CO to be drawn into the home. Mr. Zieman noted that the International Residential Code (IRC) has a 10' separation if the vent is less than 2' tall. Mr. Walter suggested the CO detector issue be considered. Mr. Jewell noted that such a public comment needs to be given an adequate treatment. Mr. Matchneer stated that Mr. Rodgers has been given 10 minutes for his presentation and discussion.

8. The discussion of the PIA draft resumed.

3282.204(e) Mr. Zieman suggested replacing the last two sentences with new language requiring the IPIA to verify that the manufacturer has conducted an investigation under 3282.404 on unsold homes not isolated to the manufacturer's facility or retailer lots. There was a discussion as to potential for confusion between this section and Subpart I.

Mr. Weinert moved that Mr. Zieman's suggestion be made; Lubliner seconded. After further discussion a motion to call the question carried. Motion voted on and carried.

Ms. Defosses moved that "or sections thereof" be deleted in all three places; Walter seconded. It was noted that at some point HUD will have to deal with multi-wides and that this should stay in. Mr. Zieman noted that the phrase is redundant; a home includes the sections. Motion carried.

Mr. Walter noted that a requirement that the manufacturer determine the cause of a problem should be added. He moved that such language be inserted in the first sentence. Motion seconded by Ms. Nelson and carried.

3282.205(a) It was noted that this is not currently being done. It was moved, seconded and carried that this paragraph be deleted.

3282.205(d) Ms. Defosses moved that "and the regulation" be deleted at the end of the first sentence. Motion seconded and carried.

It was moved and seconded that the entire second sentence be deleted as it is unnecessary. Mr. Jewell stated that the presence of the label is a certification that the home does not contain an imminent safety hazard and complies with the HUD construction and safety standards, and clarifies that the consumer has legal recourse if it does not. Mr. Weiss noted that the provision is already covered by the statute. Motion carried.

There was a discussion as to whether “or section thereof” should be deleted. After discussion It was moved, seconded and carried that “or” be changed to “and”. “or sections thereof should be retained in the previous paragraph.

3282.206(c) It was noted that approval by the Secretary is not necessary if both parties resolve the disagreement.

3282.208(b) Mr. Weiss recommended that this paragraph be removed as it paraphrases Subpart I. A rewrite, deleting “may be required to correct noncompliances” was moved, seconded and carried.

Mr. Walter requested that HUD provide the Committee members with a copy of the standard.

3282.210(b) Second sentence rewritten – IPIA must not issue labels until it has evidence that payment has been made”. Rest deleted.

3282.212 There was a discussion of how files are to be kept and cross referenced. It was noted that Subpart I requires the SAA to inspect records. Ms. Defosses noted that all files are made available; Mr. Zieman noted that they should be readily accessible. Mr. Weinert expressed a concern regarding conversion of paper files to electronic ones. Mr. Jewell suggested the files be in an easily accessible format. Mr. Gorman moved that the issue be tabled to allow the stakeholders discuss; motion seconded and carried.

3282.351 Mr. Vogt noted that the first paragraph is repeated from the Act. It was moved, seconded and carried that it be deleted.

3282.351(b)(3) Mr. Weinert proposed a rewrite of the paragraph to indicate that the PIA verifies the facility’s capability. Motion to accept his rewrite made, seconded and carried.

3282.351(b)(5) Mr. Weinert proposed a rewrite of the paragraph to indicate that the PIA must be able to recognize problems and approve the manufacturer’s determinations. Motion to accept his rewrite made, seconded and carried.

During the discussion, Mr. Matchneer noted that the PIAs do not certify homes; they verify the manufacturer’s capability to produce homes that conform to the Construction and Safety Standards. HUD, then, essentially licenses a facility to produce homes. Mr. Lubliner asked whether HUD had the resources to validate the verification. Mr. Matchneer stated that the resources were sufficient at IBTS.

3282.352(c) Clarified to indicate how applicant intends to “operate on behalf of the Secretary”.

After a short recess the Committee discussed how to handle the reference standards in the 3rd set of Construction and Safety Standards. Mr. Matchneer noted that the 3rd set had been approved by the MHCC three years ago so the reference standards must be reviewed to ensure they are current. To use out-of-date standards contributes to the impression that the HUD standards are not up-to-date with current practices. He noted the issue in the 1st set with the NEC and receptacle placement.

Mr. Solomon indicated that he had reviewed the list of reference standards for the latest dates and availability.. He distributed the review. It was noted that ASC 7 calculates wind loads with

different methodology than the MHCC. Mr. Mendlen noted that the Wind Task Force is considering ASC 7. Mr. Zieman recommended that the latest date reference standards for appliances in 3280.703 be approved as all appliances now comply with those standards. Mr. Solomon indicated that the plumbing standards are not applicable to the 3rd set. A concern was expressed about NDS 2001.

Mr. Walter moved that, with the exception of ASC 7 and NER 272, HUD should publish the 3rd set with all the standards on the list updated to the current version, where standards have been replaced use the replacement. Vogt seconded. **IT IS NOT CLEAR WHAT IS TO BE DONE WITH NDS 2001, IF ANYTHING)**

A question was raised whether the reference standards in the 2nd set should be reviewed. Mr. Matchneer stated that it is ready for publication as a proposed rule, pending Administration review. Updates can be submitted during the public comment period. Mr. Mendlen indicated that it was not clear whether the reference standards in the 3rd set had actually been voted on by the Committee. He noted there had been discussion but is unclear whether a vote was taken. Messrs. Weinert and Stamer noted that it is impossible to keep up with changes in standards. Mr. Vogt stated that the references should not be different than those in the IRC so that small manufacturers of both manufactured homes and modular homes only have one set to deal with. Mr. Zieman noted that there are three categories of reference standards – material and appliance standards that are pretty safe to update, design standards, e.g. NDS 2001, and the NEC and ASC 7.

Walter motion carried 12-1.

Discussion of the draft PIA rule continued.

3282.353(b) There was a discussion of whether HUD could or should approve state fees. It was noted that states must justify fees to the state legislature. It was suggested that if states must disclose fees, private IPIAs should also. It was noted that state fees are public. Mr. Vogt indicated that if states can't do onsite inspections without being an IPIA, then states will give the program back to HUD or become an IPIA. Ms. Defosses moved that all but the first sentence of this paragraph be deleted. Ghorbani seconded. Motion carries.

3282.356(f) Ms. Danner asked what the intent of the paragraph is. Mr. Matchneer indicated that it was a way for HUD to take corrective action with a PIA as they are not HUD employees.

3282.358(a) Mr. Walter moved that the last sentence of the original 358(a) regarding adequate personnel be restored. Zieman seconded. Mr. Lubliner noted that there also needs to be adequate funding. Motion amended to require adequate funding to provide sufficient personnel. Motion carried.

The Committee recessed for the day at 4:55 p.m.

Thursday, July 30, 2009

The Committee reconvened at 8:05 a.m.

9. Mr. Chris Early, DOE, made a presentation on the DOE program on energy efficiency for manufactured housing. He distributed copies of a presentation prepared by Robert Lucas,

Pacific Northwest Laboratory. He noted that DOE is required to use the International Energy Conservation Code as the basis of its considerations. The DOE must consult with HUD and provide a public comment period. He expects that a Notice of Proposed Rulemaking (NPRM) will be published in early 2010.

Mr. Weinert asked if DOE will be consulting with state energy commissions. Mr. Early indicated not yet but DOE will keep that in mind. Mr. Lagano asked if DOE is aware of the MHCC's interest in the DOE activity. He asked whether DOE has a "line of demarcation" between DOE's activity and the MHCC's. Mr. Matchneer noted that Messrs. Dave Conover and Robert Lucas, DOE, have prior experience with manufactured housing. Mr. Lagano asked whether the MHCC will submit comments as the MHCC. Mr. Matchneer indicated that he would have to discuss this with the Commissioner. Mr. Walter said that he was pleased to see DOE was considering life-cycle costing. Mr. Early indicated DOE would welcome input on life-cycle costing.

Mr. Ghorbani emphasized that Congress specifically wants DOE to work with HUD. He recommended that DOE work with the MHCC early in the process as the MHCC can provide a lot of help. Energy use is an important consideration in manufactured housing. Mr. Matchneer noted that DOE has been good about keeping HUD apprised of its activity. Mr. Zieman asked whether the NPRM will ask for comments on issues such as lighting, whole-house ventilation and solar heat gain. Mr. Early stated that Section 413 of the energy act allows many aspects to be considered. Mr. Early indicated that he expects to work closely with HUD; Mr. Matchneer indicated that he expects a Memorandum of Understanding (MOU) to be developed between DOE and HUD. Ms. Brenton thanked Mr. Early for his presentation.

10. Ms. Brenton opened the floor for public testimony.

Mr. George Waechter, Minute Man Anchors, thanked the MHCC for looking at the galvanizing issue for anchors. He asked what the reason is for developing a protocol for testing ground anchors. Mr. Mendlen stated HUD has been studying anchor for many years because of high wind failures. Mr. Matchneer noted that currently there is nothing in the standards on how to evaluate anchors. Mr. Waechter indicated that he would welcome a rigorous standard. He indicated that independent testing agencies that he has talked to would be willing to assist in evaluating the MHCC draft protocol.

Mr. Stamer noted that the industry is in its worst condition. He indicated that he felt like the Committee is rearranging the deck chairs on the Titanic. He stated that the Committee needs to be cognizant of the state of the industry and not kill it with regulations. He asked what the MHCC or HUD could do to help. Mr. Matchneer noted that under former Commissioner Montgomery HUD has pressed Fannie Mae and Freddy Mac to better serve manufactured housing. He noted that there is a big problem in the secondary market. Ms. Brenton stated that manufacturers could work with manufactured housing communities to open local opportunities for financing. Mr. Sheahan noted that H.R. 2454 provides for a rebate for low income homeowners that purchase a new Energy Star manufactured home. Mr. Long noted the rebate is limited to homes made prior to 1976. Mr. Sheahan reported that he has met with FHA regarding its duty to serve the manufactured housing market. Ms. Nelson and Mr. Gorham noted that affordability including ability to pay is a critical factor. Mr. Ghorbani noted that every time a cost is added someone is eliminated from the market. Mr. Lubliner expressed a concern about the industry.

Mr. Tom Rodgers, a self-described citizen lobbyist from GassingAmerica.us, made a PowerPoint presentation regarding concerns over the placement of fresh air intake vents within

3 feet of an exhaust vent which may permit CO to be drawn into the home. He noted that he became involved in the issue when a family asked for his assistance in the case of their ill child. He noted that he suspected that the child exhibited the symptoms of CO poisoning. In looking for potential sources he noted that the dilution air intake vent was within 3 1/2 feet of the combustion exhaust vent. He also noticed that all the homes in the community had the same design. He noted that the HUD code only requires a separation of 3 feet whereas the building code requires 12' – 14'. He urged the MHCC to change the HUD code.

Mr. Zieman asked if the CO level had been measured. Mr. Rodgers indicated that measurements at the intake showed 200 ppm.

Mr. Rodgers circulated a copy of his photos.

Mr. Matchneer thanked Mr. Rodgers; he indicated that he appreciated the effort Mr. Rodgers made to come to the meeting and make his presentation.

There were no further public comments.

11. Chair Brenton resumed the Committee meeting at 9:15 a.m. She called for approval of the minutes of past meetings and conference calls.

The minutes of the April 7, 2009 conference call were approved.

It was noted that the statement read by Mr. Roberts was not attached to the May 7, 2009 Conference call minutes as indicated in the minutes. Mr. Solomon indicated that the attachment was still being discussed with HUD. Mr. Matchneer stated that HUD had no objection. Mr. Ghorbani moved that approval of the May 7, 2009 minutes be tabled until the record is complete.

The minutes of the June 17-19, 2008 meeting were approved.

The minutes of the July 16, 2008 conference call were approved.

12. Planning and Prioritization Subcommittee,

Mr. Lagano reported that the project list would be revised and updated. He noted that the MHCC procedures state that a submitter must be notified if his/her proposal is rejected by the Committee. He noted that some proposals have been rejected by the Subcommittee but never moved from there. Mr. Zieman indicated that some proposals would be brought forward for Committee action during the Technical Subcommittees' reports.

Mr. Solomon reported that a new form with instructions has been developed for proposals. He asked whether a Federal Register notice should be published seeking comments to changes to the standards. Mr. Lagano noted that in previous meetings it was agreed that HUD would not have to use the form for proposals it wished the Committee to consider.

Mr. Ghorbani stated that, given the state of the industry, proposals should be reviewed very carefully for justification. He noted that members should be cognizant of their responsibility to protect the affordability of manufactured housing. Mr. Lubliner noted that members must not only consider first cost but also ongoing costs of homeownership. Ms. Brenton noted that cost savings should also be considered. Mr. Weinert stated that proposals should be evaluated on

their merit. Mr. Solomon stated that the AO would not reject a proposal if it did not include justification; that should be done by the Committee. Ms. Brenton stated that the relevant Subcommittee should make the determination as to whether cost and justification is included in the proposal. Costs may necessarily be approximate.

Technical Structure and Design Subcommittee

Mr. Solomon reviewed the actions that may be taken on a proposal. Actions taken by the Committee would then be submitted to a letter ballot for confirmation. This would also allow for a minority opinion to be recorded.

Mr. Zieman stated that there is a standing motion to accept the Subcommittee recommendation. He stated that there are two items for MHCC action

The Subcommittee rejected Log 29; the matter is already covered in the HUD code. MHCC accepted the recommendation.

The Subcommittee rejected Log 66; the proposal was not presented in code language and appeared to be a proprietary system. The MHCC accepted the recommendation.

Technical Systems Subcommittee

Mr. Zieman stated that there are six current items and two items from last year for MHCC action.

The Subcommittee rejected Log 22; moisture can move both in and out. MHCC accepted the recommendation.

The Subcommittee rejected Log 24; the Subcommittee was not convinced of the validity. MHCC accepted the recommendation, Lubliner abstaining.

The Subcommittee rejected Log 35; there is no member experience that this is a problem.

The Subcommittee tabled Logs 57, 58, and 61.

The Subcommittee accepted Log 60. Mr. Stamer stated that the consumer should be allowed to decide whether they wanted to pay for an Energy Star appliance. Mr. Ghorbani recommended that the Committee not do anything on energy pending action by DOE. Mr. Weinert noted that DOE is not addressing appliances. Mr. Walter said if DOE is not addressing the MHCC should. Ms. Defosses said the consumer should be given a choice. Mr. Lubliner stated that if Energy Star appliances were mandated, the increased demand and buying power of the manufacturer would reduce the price. Messrs. Gorman and Zieman agreed that the consumer should be given a choice. Mr. Lagano suggested that the discussion be tabled until it is clear what DOE will do. Mr. Lubliner stated that would be a stalling tactic.

Mr. Weinert called the question. Motion seconded, carried unanimously.

Mr. Zieman moved that the recommendation by the Subcommittee be accepted; motion seconded. Motion failed 5 affirmative, 8 opposed.

Mr. Zieman moved to reject Log 60; motion seconded. Motion carried 11 affirmative, 5 opposed.

Mr. Zieman moved that the Subcommittee recommendation to accept Log 62 be accepted. Motion seconded. Mr. Lubliner noted that the HUD has a directive that low income housing must be Energy Star. Ms. Defosses again stated that the consumer should decide, not have it dictated by the MHCC. Mr. Weinert stated that this is an important issue, we should regulate for the future. Mr. Zieman noted that this proposal is different than the previous one on appliances. There was a discussion of the requirements to meet the Energy Star program, noting that there are tradeoffs in the program. It was noted that in an earlier discussion concern was raised about affordability. The motion failed to pass on an 8 – 8 vote.

Mr. Braun moved that the proposal be rejected; motion seconded. Motion carried, 9 affirmative, 6 opposed.

Mr. Matchneer stated that HUD has developed a proposal on CO detectors. Mr. Mendlen distributed draft proposed language for a new section 3280.211, Carbon Monoxide Detection Requirements. The draft was amended to read "A carbon monoxide alarm(s) or detector(s) must be installed according to the *Standard for the Installation of Carbon Monoxide Warning Equipment, NFPA 720-2005* edition and in accordance with the installation instructions that accompany the unit. Each carbon monoxide alarm or detector installed must be listed and conform to the requirements of *Single and Multiple Station Carbon Monoxide Alarms, ANSI/UL 2034-2005*. The draft was further amended to change the date of NFPA 720 to the 2009 edition.

Mr. Zieman asked what should be done for homes installed in basements. Mr. Mendlen indicated that should be handled with an amendment to the Installation Standard. Mr. Zieman stated that the requirement be modeled after 3280.208(b) (2).

It was moved, seconded, and carried that the revised draft language for new 3280.211 be adopted.

13. Ms Brenton announced that the meeting is being held open to be continued by conference call on August 7, 2009 at 10:00 AM and August 20, 2009 at 11:00 AM for the purpose of completing the work of the agenda. The agenda item(s) from this agenda to be covered at the continuation of this meeting are further discussion of the draft PIA rule.

Mr. Matchneer reported that Mr. Everett was working on Subcommittee assignments with GSA.

A call for volunteers will be distributed to review the reference standards.

The Committee recessed until 10:00 AM, August 7, 2009

Friday, August 7, 2009.

The Committee reconvened by conference call at 10:00 AM

14. Ms. Brenton called the call to order. Mr. Toner called the roll; a quorum was present. HUD and guests introduced themselves.

Mr. Gorman thanked Mr. Roberts for the work he had done in identifying policy issues in the draft PIA rule.

Mr. Ghorbani asked whether the individual votes taken required 2/3 majority to pass or whether the votes were a straw poll, and, if the later there would be a vote at the end of the review that required a 2/3 majority. Ms. Brenton stated that the individual votes were straw votes and that there would be a written ballot at the end.

15. Ms. Brenton continued the review of the draft PIA rule.

3282.360 Mr. Zieman stated that this requirement is “over-the-top”. It would require a DAPIA to go to UL, for example, and evaluate its test equipment and personnel. Mr. Luttich recommended that the paragraph be deleted. Mr. Walter asked if the DAPIA did not do this, who would. Mr. Zieman noted that most labs are accredited by independent agencies to ISO or other standards. Mr. Walter asked if HUD accepted accredited laboratories; it does. Mr. Zieman moved that the paragraph be replaced with the language in the original 3282 document. Mr. Long agreed. Motion seconded and carried.

3282.361(a)(1) It was noted that “responsible to HUD” is superfluous; the entire program is responsible to HUD. Mr. Jewell stated that it served to emphasize the point. Mr. Weiss noted that a DAPIA was subject to disciplinary action by HUD for failure to perform. It was moved, seconded and carried that “responsible to HUD” be deleted; Jewell opposed, Zieman abstaining.

There was a discussion of whether a home that exceeds the model installation standards would “conform”. It was moved, seconded and carried that “conform” be changed to “are equal to or exceed”.

3282.361(a)(2) Mr. Stamer questioned whether an IPIA could reject a design or quality assurance manual approved by a DAPIA. Mr. Zieman stated that an IPIA has no choice if it believes it violates the Construction and Safety Standards. Mr. Jewell noted that it is a safeguard against the DAPIA becoming too close to the manufacturer. Mr. Zieman noted that if the IPIA and DAPIA cannot come to an agreement, they can go to HUD. Mr. Jewell asked if there were an appeals process. Mr. Lagano noted that going to HUD is the appeals process. Mr. Zieman questioned whether “knows or has reason to know” is appropriate in this instance. Mr. Matchneer stated that it is a “legal test of knowledge”.

3282.361(a)(3) It was noted that this paragraph was unnecessary. It was moved, seconded and carried that it be deleted.

3282.361(b)(1)(ii) Mr. Stamer asked why the last paragraph of the original draft proposal had been deleted. Mr. Matchneer noted that the AC rule covers it. Mr. Roberts asked whether the paragraph allows the “equal or exceed” provision. Mr. Matchneer indicated that it did. The paragraph was restored.

3282.61(b)(3) Mr. Zieman noted that the last two sentences are new requirements. He questioned why a report must be issued on new designs that are to be corrected. Mr. Luttich noted that it should only apply to post-approval cases. Mr. Long recommended that the sentences be deleted. Mr. Zieman noted that even if the requirement was rewritten the required report is of no benefit. Mr. Luttich noted that there would be no reason to notify the IPIAs. Mr. Mendlen stated that notification would be required for previously approved designs. Mr. Walter

noted that the original 3282.361 only applied to new designs prior to being built. Mr. Walter recommended that paragraph 3282.361(a) be clarified that it applied to new designs and that 3282.361(b) applied to existing. Mr. Zieman recommended that the paragraph be rewritten and create new sections. Mr. Matchneer stated that there is not sufficient time to draft new language and circulate it to the MHCC for review.

It was moved, seconded and carried that the last two sentences be deleted and that the MHCC comment on the need to clarify the section.

3282.361(c)(2) Mr. Zieman asked what “coordination” is expected. Mr. Matchneer stated that coordination is a general principle to be emphasized. Mr. Weiss stated that it duplicates the responsibilities in 3282.364. Mr. Walter moved that the sentence be moved to a new 3282.361(c)(5). A friendly amendment made it a new 3282.361(d). Amended motion seconded and carried, 8 affirmative, 7 opposed.

3282.362(a)(1)(iv) Mr. Nebbia noted that “red tags” is used as a verb. It was OK. Mr. Stamer noted that it is the responsibility of the manufacturer to correct the problem(s).

3282.362(b)(1) There was a discussion of the issuance of labels. HUD is to reword the paragraph.

3282.362(b)(1)(ii) The term “checklist” was questioned; is it a “traveler”. “Traveler” has been deleted. “checklist” changed to “description of required inspections and tests”.

3282.362(b)(1)(v)(E) Deleted, management responsibility

3282.362(b)(2) First sentence was changed to “qualified personnel”, rest of sentence deleted.

3282.362.(b)(3) Mr. Stamer asked what the process is for a brand new plant. Mr. Pethel indicated that the IPIA, manufacturer and the DAPIA should work it out. The “two to four week’s supply of” was deleted.

3282.362(b)(4) Mr. Stamer expressed a concern about a “late response” by HUD. Mr. Matchneer stated that it is not normal to put a time limit on action by the Secretary in a regulation, only Congress can do that. Mr. Stamer noted that a delayed response, if it involves corrective action, adds cost and delay to the consumer. Mr. Ghorbani questioned why this is necessary, especially if it adds cost to the consumer. Mr. Weiss suggested adding “within a reasonable time”.

3282.362(b)(5) Moved to end of 3282.362(b)(4)

3282.362(b)(6) A time limit of 5 years was added.

16. Ms. Brenton stated that the discussion on the draft PIA will be continued by conference call at 11:00 AM, August 20, 2009 start at 3282.362(b)(8)

Mr. Zieman asked if the CO issue could be brought back for discussion. Ms. Brenton indicated that it could be discussed on the conference call on the 20th.

The call concluded at 1:00 pm.

Thursday, August 20, 2009.

The Committee reconvened by conference call at 11:00 AM

17. Ms. Brenton called the call to order. Mr. Solomon called the roll; a quorum was present. HUD and guests introduced themselves.

It was moved and seconded that the CO detector issue be returned to the Subcommittee. Mr. Walter supported the action. It was felt that additional work on the language and placement is needed. Mr. Weinert asked if this is a carryover from the face-to-face meeting. Mr. Jewell noted that at the face-to-face meeting it was agreed that the requirement should be placed in the Installation Standard. Mr. Berger stated that the issue is being beat to death. All the issues were discussed at the Subcommittee. Mr. Weinert noted that the placement was handled the same way as smoke detectors. Mr. Berger stated that the Subcommittee had made the recommendation for the requirement. Mr. Walter noted that there was question about the power source. Mr. Weinert noted that the regulation does not address power. It allows flexibility. A motion to call the question was seconded and passed unanimously. The motion to return the question to the Subcommittee failed, 5 affirmative – 8 opposed.

18. Ms. Brenton resumed the review of the draft PIA rule. Mr. Weiss asked if the Committee's review would be subject to a letter ballot. Mr. Solomon cautioned that the due date for comments is September 8th.

Mr. Nebbia noted that HUD was to reword 3282.362(b)(1). Mr. Luttich noted there is a question about completion of the certification. Mr. Matchneer noted that the labels are under the control of the IPIA. The prior decision to let HUD reword the paragraph was confirmed.

3282.362(c)(1) Mr. Weinert noted that this is a long section. He recommended that HUD look at how it could be broken up. He also recommended that "plant" be changed to "facility" throughout the document. Both recommendations accepted.

3282.362(c)(2) "repeatedly" fail was changed to fail "during multiple inspections". There was a discussion of the need to inform HUD when the IPIA increases the frequency of inspections. Mr. Matchneer noted HUD should know that a facility is subject to increased surveillance as it is an indication of a problem. HUD does not need to be consulted regarding corrective actions, just informed. The 3 day notification was changed to 3 business days. Mr. Weinert stated that HUD should also be notified prior to the IPIA returning to normal frequency of inspections – notification also to be 3 business days. This is to ensure that there are no other issues involved. It was moved, seconded and carried that the changes be made. It was recommended that this section be split into two sections – one on increased inspections, one on removal of labels.

3282.362(c)(3)(i)(E) There was a discussion of when labels are to be replaced and by whom. The paragraph was edited.

3282.362(c)(3)(ii)(C) Mr. Zieman stated that this only applies to private IPIAs. Mr. Luttich noted that he frequently gets requests in refinancing cases. Paragraph (C) and (D) were combined. Records are to be kept for 5 years. Mr. Luttich noted that there are 2 options – maintain the records or send them to HUD.

3282.362(c)(3)(ii)(F) There was a discussion of the two to four week supply of labels. Mr. Weinert stated that the manufacturer and IPIA should be able to agree on a supply. It was moved, seconded and carried that the amount be agreed between manufacturer and IPIA.

3282.362(c)(3)(ii)(G) Noted that the provision only applies to homes not sold.

3282.362(c)(4) Ms. Defosses asked whether a minor defect should be red tagged. Yes, it should be corrected.

19. Ms. Brenton stated that the discussion on the draft PIA will be continued by conference call at 11:00 AM, August 27, 2009 starting at 3282.362(c)(4).

The call recessed at 2:05 PM.

Thursday, August 27, 2009

The Committee reconvened by conference call at 11:00 AM

20. Ms. Brenton called the call to order. Mr. Solomon called the roll; a quorum was present. HUD and guests introduced themselves. Ms. Brenton resumed the discussion of the draft PIA rule at 3282.362(c)(4).

3282.362(c)(5) The HUD label number was added to the information to be on the data plate.

3282.362(d) Added records to be kept for a 5 year period.

3282.363 The right to inspect was limited to 'within reasonable time limits and in a reasonable manner'.

3282.364 Reports of drawings of imminent safety hazards and failure to conform should be sent to all facilities using the design.

3282.365 To be deleted – HUD administrative function

3282.366 The responsibilities of the IPIA, DAPIA and manufacturer were discussed. Ms. Nelson noted that as a consumer she wanted all three involved in identifying a class. Mr. Roberts noted that the PIAs are only responsible for reviewing the manufacturer's method for identifying a class. Mr. Vogt concurred. After further discussion it was determined that 3282.366(b) and (c) were not necessary.

3282.451 It was noted that an SAA must have an approved state plan.

3282.453 Mr. Stamer asked what the qualifications are for monitoring. Mr. Weinert noted that they must meet the requirements of ASTM E541, *Standard Specification for Agencies Engaged in System Analysis and Compliance Assurance for Manufactured Building*. It was suggested that HUD require certification of PIAs in lieu of ASTM E541. Mr. Stamer stated that the document makes IPIAs "super powers" in the plant. Mr. Weinert recommended that the topic be put on the Committee work item log. It was noted that the SAA was monitoring in lieu of the monitoring contractor, not duplicating monitoring.

21. Ms. Brenton stated that the discussion on the draft PIA will be continued by conference call at 11:00 AM, September 1, 2009 starting at 3282.453.

The call recessed at 2:00 PM.

Tuesday, September 1, 2009

The Committee reconvened by conference call at 11:00 AM

22. Ms. Brenton called the call to order. Mr. Solomon called the roll; a quorum was present. HUD and guests introduced themselves.

Ms. Brenton noted that the bylaws state that there be a two week period for letter ballots followed by a circulation period of two weeks. Mr. Solomon explained the voting period in the

bylaws. He also noted that the revised document is almost 2/3 complete has been distributed so the Committee has a head start on reviewing the final. Mr. Ghorbani asked whether HUD would agree to an extension of the comment period for the letter ballot. Mr. Matchneer suggested a one week ballot. Mr. Farish stated he likes to see the recirculation of the results of the initial ballot because it allows one to review the comments on the ballot. Mr. Solomon explained the voting options. He noted that except for an affirmative vote, all other votes must be accompanied with a comment or reason. Mr. Roberts noted that the MHCC's comments need a 2/3 majority to go forward.

23. Ms. Brenton resumed the discussion of the draft PIA rule at 3282.453.

3282.453 It was noted the MHIA 2000 gives the states authority under an approved state plan.

Ms. Defosses moved that paragraphs (a)(1), (a)(2), (a)(4) and (b)(1), (b)(2), and (b)(G) be deleted. Motion seconded and carried.

3282.453(b)(4) At the end of the paragraph, sending copies to all monitoring personnel was deleted.

3282.454 It was noted that there should be a time limit on when reports are distributed to affected PIAs. Mr. Matchneer noted that regulations do not normally impose time restraints on the Secretary. 180 days was agreed upon.

3282.551 Mr. Weiss recommended that the second sentence be deleted as unnecessary. Mr. Weinert stated that it serves as a red flag. Motion to delete was seconded and carried with Messrs. Weinert and Zieman opposed.

3282.552(a) Mr. Zieman noted that it is not clear whether this paragraph applies to a labeled house or one in construction. It is for a house that has shipped. First sentence deleted. "Immediately" was changed to 5 days.

3282.552(b) Paragraph clarified to indicate it did not apply to homes under a Section 404 notification. "Immediately" was changed to 5 days.

3282.552(c) "Manufacturer" in second sentence changed to "retailer", mistake.

3282.553(a) It was noted that Subpart M is not yet in effect. Mr. Matchneer stated that it would be by the time this rule is published.

3282.553(b) It was questioned whether all this information was necessary. Mr. Wade noted that some of this is already reported to HUD and it is an unnecessary cost to repeat it. Paragraph (1) was deleted. Paragraph (3) was deleted Ms. Defosses moved that (4) –(7) be deleted. Seconded and carried.

3282.553(c) Mr. Weinert moved that paragraph (1) be deleted; seconded and carried. Mr. Zieman moved that paragraph (2) be deleted; Mr. Roberts stated that this is already reported. Motion seconded and carried. Mr. Zieman moved that paragraph (3) be deleted.

3282.553(d) Mr. Weinert noted that this is being done now. He questioned whether the report is necessary. Mr. Zieman stated that the report is being sent to the SAA, not to HUD.

24. Mr. Nebbia asked what form the Committee wished to receive the document(s), redlined or with comments. Mr. Walter recommended a strikeout/underlined version.

Mr. Ghorbani asked what should be done now as this is not a complete package. Ms. Brenton indicated that the Committee could address the policy issues or submit the policy issues with comments. Mr. Matchneer stated that it would be easier for HUD if it were provided with a strikeout/underlined version of the original draft. Mr. Walter indicated that he would vote affirmative with comments as he felt it was in the public interest to send the Committee document to HUD. Mr. Ghorbani stated that here is another approach – reject the draft as incomplete and requesting that HUD come back with a more detailed proposal. Ms. Nelson indicated that she agreed with Mr. Walter.

Ms. Nelson asked what would happen if the ballot does not receive the 2/3 majority. If the vote is to reject as incomplete, the Committee must provide some comments to HUD. Ms. Defosses noted that if the law requires justification and cost for a regulation, then without it, the package is incomplete. Ms. Brenton indicated that there have been different interpretations of the law between HUD and some members of the Committee. Mr. Matchneer noted that if the draft is rejected then the process just gone through has been wasted. He stated that the cost and justification will be included in the published proposed rule for comment. Ms. Defosses stated that, even though the Committee accepted proposals without cost and justification in the past, in these tough economic times it may be time to change. Mr. Ghorbani noted that there is a new Administration that is watching closely. Mr. Weiss noted that section 604(e)(4) of the MHIA 2000 requires the MHCC to shall consider the probable effect of standards on the cost of manufactured homes to the public. He stated that such information is necessary when considering proposals.

Ms. Brenton noted that in most cases HUD has presented proposals to the Committee without the 120 day response time limit. Mr. Roberts noted that Section 604(b)(3)(A)(i) contains the 120-day limit for MHCC to comment. Mr. Ziemann noted that although the Committee has to consider cost, it does not require HUD to provide cost data.

Mr. Walter recommended that members vote affirmative with comment. Mr. Berger asked whether HUD will publish the proposed rule and include the MHCC comments. Mr. Matchneer stated that has been the intention all along. Mr. Ghorbani stated that the draft proposed rule should be sent back. Ms. Nelson noted that she will be attending a national homeowners meeting in Seattle where homeowners from at least 30 states will be attending. She could raise issues for discussion and feedback if she had sufficient accurate information. Mr. Berger noted that as consumer representatives, they should not be making decisions without cost impact information. Mr. Weinert noted that he does not want to limit discussion on cost, but the Committee has no cost information to discuss.

Mr. Matchneer stated that, based on the MHCC discussions on the draft proposed rule over the last several months, the final proposed rule will have changed and the cost estimates will be different from what might have been estimated for the draft. He noted that the Committee strikeout/underline version will be published along with the final proposed rule and its associated costs. Ms. Brenton asked if the final proposed rule will be circulated to the Committee for 120-day comment period.

Ms. Nelson asked if we don't move forward do we stop here. She moved that the MHCC should vote to accept or reject the entire document. Mr. Solomon explained the possible voting options - Affirmative, Affirmative with comment, Negative, or Abstain. The latter two votes require an

explanation. Mr. Solomon stated that the record will reflect all the MHCC comments. Mr. Matchneer indicated that the preamble will include a discussion of and reasons for acceptance or rejection of the comments. Mr. Ghorbani noted that a 2/3 majority is needed to approve submission to HUD. Ms. Nelson noted that the proposal will not stop with a failed vote. HUD eventually will publish a proposed rule. Mr. Weinert called the question. Motion seconded and carried without objection. It was moved, seconded and carried, without objection, that the MHCC revised draft proposed PIA rule be submitted to the MHCC for a letter ballot. Ballot to include the strikeout/underlined document and the policy issues. Mr. Solomon reviewed the timing of the ballot, the recirculation ballot and submission to HUD. Ms. Defosses asked what the purpose of the second ballot is. Mr. Solomon stated that the ANSI procedures require the recirculation so that everyone can see what comments were made and could change their vote if persuaded to do so by the comments. The MHIA 2000 requires the MHCC to follow the ANSI procedures. Ms. Brenton asked Mr. Matchneer if the timing was acceptable. He indicated that it is.

25. The call and the continuation of the July 28 – 30, 2009 MHCC meeting concluded at 2:00 PM. The Committee adjourned.

HUD MANUFACTURED HOUSING CONSENSUS COMMITTEE

**July 28-30, 2009
Holiday Inn Arlington
Arlington, VA**

STATUS: M=MEMBER; NVM=NON VOTING MEMBER; AO= Administering Organization; SEC=SECRETARY

NAME	STATUS	ORGANIZATION	Tuesday July 28 th	Wednesday July 29 th	Thursday July 30 th
Susan Brenton - <i>Chair</i>	M	MHCA	X	X	X
William J. Lagano - <i>Vice Chair</i>	M	Commonwealth Consulting Corp.	X	X	X
Pat Toner	SEC/AO	NFPA	X	X	X
Jack D. Berger	M	Consultant; Berger Construction			
Karl Braun	M	NAMH – MHOAA	X	X	X
Theresa Desfosses	M	State Manufactured Homes, Inc	X	X	X
William Farish	M	Clayton Homes			
Danny Ghorbani	M	MHARR	X	X	X
Doug Gorman	M	Home – Mart, Inc.	X	X	X
Kevin Jewell	M	Texas Low-Income Housing Information Service	X	X	X
Michael Lubliner	M	Washington State University /Energy	X	X	X
Mark Luttich	M	NE Public Service Commission, Housing & Recreational Vehicle Dept.	X	X	X
Terry Nelson	M	MHOA OF IL	X	X	X
Timothy Sheahan	M	GSMOL/V.P. MHOAA	X	X	X
William Stamer	M	Champion Enterprises	X	X	X
Randy E. Vogt	M	Minnesota Dept. of Labor & Industry	X	X	X
Michael Wade	M	Cavalier Home Builders, Inc.	X	X	X
Frank Walter	M	Consulting Civil Engineer	X	X	X
Richard Weinert	M	State of California	X	X	X
Mike Zieman	M	RADCO	X	X	X
William W. Matchneer	DFO	HUD	X	X	X
Robert Solomon	AO	NFPA	X	X	X

HUD MANUFACTURED HOUSING CONSENSUS COMMITTEE

GUEST ATTENDANCE

**July 28-30, 2009
Holiday Inn
Arlington, VA**

NAME	COMPANY
Aguolu, Ujo	HUD
Brown, Adrian C.	HUD
Carpio, Daniel	HUD
Colsen, Kirsten Ivey-	HUD/OGC
Cooney, Brian	MHI
Danner, Pamela	Danner & Associates
Early, Chris	U.S. Department of Energy
Everett, James	HUD
Ferrante, Vic	HUD
Goswami, Ashok	IBTS
Hoyt, Gregory	HUD
Kritikos, Effie	HUD- OGC
Long, Thayer	MHI
McDuffie, Patricia	HUD
Mendlen, Richard	HUD
Nebbia, Joe	Newport Partners, LLC
Pethel, Lane	HUD
Podzius, Kasey	HUD/OGC
Postiglione, Amanda	HUD/OGC
Race, Peter	HUD - OGC
Rodgers, Thomas Lynn	Life Save
Waechter, George	Minute Man Products
Wallace, Angelo	HUD
Wing, Rob	HUD/FHA
Weiss, Mark	MHARR