T. R. ARNOLD & ASSOCIATES, INC. industrialized housing advisors

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July 27, 2001

AUG 2 2001

Mr. Dale Hardy Roberts, Secretary Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Missouri Public Service Commission

Subject: Proposed Rule and Amendments to the Modular Units Code:

Case No. MX-2000-443 and Rule 240-123.080

Dear Mr. Roberts:

T.R. Arnold & Associates, Inc. is a third party plan review and inspection agency for modular units for the Missouri Public Service Commission.

We would recommend the adoption of the International Building Code - 2000, the International Mechanical Code - 2000, the International Plumbing Code - 2000, the International Energy Conservation Code, the International Fuel Gas Code - 2000, the National Electrical Code - 1999, and the International Residential Code - 2000. These code adoptions would be consistent with the majority of other state code adoptions.

The BOCA Codes and Uniform Codes will no longer be published after the editions listed in your proposed Rules and Amendments. BOCA and ICBO (the uniform codes) support the adoption of the International Codes as they along with SBCCI have promulgated the International code series listed above.

It would be in the best interest of the building industry and building users and owners to have the Public Service Commission adopt the International series of codes.

Yours truly,

T.R. ARNOLD & ASSOCIATES, INC.

Robert W. Tanger

President

RWT/trj