

January 20, 2016

Missouri Public Service Commission

P.O. Box 360

Jefferson City Missouri 65102

Re: Case No. MW-2016-0163

Member of the Commission:

As the Executive Director of the Modular Building Institute (MBI) I am writing on behalf of the modular construction industry regarding proposed changes to the manufactured housing program referenced above. We wanted to comment on two matters regarding the changes:

First, the proposed new chapter 124 for Tie-Down Systems is clear that is applies only to manufactured housing. However the proposed Chapter 125 (which also appears to be only for HUD code) includes three words “or modular units” in section 125.040 3(B) that seemingly pull installers of all modular units into the chapter’s requirements. Was the agency experiencing issues with the installation of I-code compliant permanent homes or buildings? We recommend striking these three words from this section.

Secondly, we feel that there is an opportunity to bring Missouri regulations more in line with neighboring states as well as with the intent of the I-Codes. In Section 123.030 (13) Seals - we are proposing the following edits … *“may issue a seal to any registered dealer who has acquired a pre-owned modular unit without a seal if proof is submitted that the unit meets the requirements of the ~~existing~~ IBC or IRC in effect at the time of the unit’s construction. (strike-through deleted text and underline new text).*

We feel that this change, while still ensuring public safety, allows for owners of relocatable modular buildings (i.e. schools, construction companies), to relocate buildings consistent with the requirements of the International Existing Building Code.

We appreciate the opportunity to be able to comment on this proposal and will gladly address any concerns you may have regarding our recommendations.

Sincerely,


Tom Hardiman

Executive Director