

April 13, 2025

John Belcik

Karl Aittaniemi

Anne Caldas

200 Massachusetts Ave NW

Washington, DC 20001

Regarding: Official Complaint Regarding Changing The Title To Include The Small Residential Unit: Inaccurate Information From April 2, 2025 And A Reply From ANSI.

Dear John and Karl, and Anne,

I am writing in objection to the inaccurate meeting notes of April 2, 2025 and the text that inaccurately addressed an ANSI requirement on new pins notifications that stated;

*"SMALL RESIDENTIAL UNIT (SRU). A dwelling that is 1200 square feet (111 m2) or less excluding*

*lofts and is constructed as a permanent residential structure with or without a permanent chassis system.*

*TINY HOUSE. A SMALL RESIDENTIAL UNIT that is 400 square feet (37 m2) or less excluding lofts.*

*The committee voted 10-2 for the proposed definitions. The reason is for the definitions to be consistent with the purpose and scope of the standard. **This scope and purpose do seem to be in conflict with the purpose and scope of the standard.***

*Staff is discussing amending the title of the standard to include SRUs. **ANSI permits title changes to standards as long as changing the title is not a substantive change.***

### **ANSI's Response That Include Karl Aittaniemi**

I reached out to ANSI and included Karl because I was concerned that they did not submit a new pins notification in ANSI Standards Action as required by ANSI when there is a substantive change or a change in stakeholders. I have requested this numerous times and my request has been denied.

It is also disturbing that Karl stated in the meeting that they wanted to change the title because of '**confusion.**'

The only thing that is confusing is the noncompliance of the standard, with the full support of ICC that never addresses complaints regarding the standard development that is out of compliance with ICC, ANSI, and Antitrust Policies in a standard development setting.

Below was Anne's reply.

Good morning –

The *ANSI Essential Requirements* ([www.ansi.org/essentialrequirements](http://www.ansi.org/essentialrequirements)) does not require the filing of a new or revised PINS as a result of a title change. Titles are not addressed in the *ANSI Essential Requirements*. **A revised PINS would only be required if the stakeholders change** or for certain project intent changes, e.g., reaffirmation to revision. Please see the excerpt below.

### **2.5.1 Project Initiation Notification System (PINS)**

At the initiation of a project to develop or revise an American National Standard[1], notification shall be transmitted to ANSI using the Project Initiation Notification System (PINS) form, or its equivalent, for announcement in *Standards Action*. Comments received in connection with a PINS announcement shall be handled in accordance with these procedures.

A statement shall be submitted and published as part of the PINS announcement that shall include:

- (a) an explanation of the need for the project, including, if it is the case, a statement of intent to submit the standard for consideration as an ISO, IEC or ISO/IEC JTC-1 standard; and
- (b) identification of the stakeholders (e.g., telecom, consumer, medical, environmental, etc.) likely to be directly impacted by the standard; and
- (c) the interest categories that will or are expected to comprise the consensus body.

**If the response to sub-section (b) changes substantively as the standard is developed, a revised PINS shall be submitted and published.**

If a developer receives a written request for additional information or for the opportunity to discuss the proposal from a directly and materially interested outside party or current consensus body member, during the 30-day PINS comment period, the ASD shall respond in writing within 30 days of the comment deadline.

[acaldas@ansi.org](mailto:acaldas@ansi.org)

212-642-4914

Sr Director, Procedures & Standards Administration (PSA)

ANSI | 1180 6<sup>th</sup> Avenue, 10<sup>th</sup> Floor | NY, NY 10036

[www.ansi.org](http://www.ansi.org)

## **April 2, 2025 Meeting Notes**

Once again, focusing on this section of the inaccurate meeting notes.

*Staff is discussing amending the title of the standard to include SRUs. ANSI permits title changes to standards as long as changing the title is not a substantive change. "*

Anne Caldas did not state that. **She highlighted section (b) that stated that a new pins notification would be required as a standard is developed when:**

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**(b) identification of the stakeholders (e.g., telecom, consumer, medical, environmental, etc.) likely to be directly impacted by the standard; and**

(c) the interest categories that will or are expected to comprise the consensus body.

**If the response to sub-section (b) changes substantively as the standard is developed, a revised PINS shall be submitted and published.**

## **The SRU Stakeholders Are Not The Same As Tiny Houses Stakeholders**

It is disturbing that the meeting notes state;

*"This scope and purpose do seem to be in conflict with the purpose and scope of the standard."*

The meeting notes state that the the scope and purpose DO SEEM to be in conflict with the purpose and scope of the standard, and instead of bringing the standard to compliance with the original intent, purpose approval, pins notification, need for the industry, and the work groups

scopes that shall govern the draft, ICC staff is manipulating the standard and taking advantage of their position as a standard developer, increasing the solid fact that the Small Residential Unit is an ICC agenda that has hijacked the standard for their own personal goals.

The stakeholders that build tiny houses 400 square or less are NOT the same stakeholders that build an SRU 400 square feet or more up to 1200 square feet, and would have entirely different provisions for fabrication, transport, installation, cargo securement and more.

**Project Initiation Notification System (PINS):**

PINS is a notification system used to announce the initiation of a new standard or a revision to an existing one.

**Substantive Changes:**

A substantive change in a proposed American National Standard is one that directly and materially affects its use.

**Requirement for New PINS:**

If substantive changes are made during the development of a proposed standard, the ANSI requires a revised PINS submittal. This is to ensure that the public and stakeholders are aware of the change and have an opportunity to comment on it.

**Examples of Substantive Changes:**

This could include adding, deleting, or revising requirements in the standard.

**Public Comment Period:**

After a PINS is submitted, there is a public comment period during which interested parties can review and comment on the proposal.

**Impact on Stakeholders:**

Substantive changes can have significant impacts on stakeholders, including businesses, consumers, and the public. A new PINS allows for a re-evaluation of the potential impacts and ensures that stakeholders have the opportunity to voice their concerns.

**5 Missing Voting Members**

We have 5 missing voting members at a crucial time that public comments are being addressed. The meeting notes failed to mention that Matt Rozelli has missed the last 5 meetings in a row.

The meeting notes also stated; Bill McKinney contacted staff and will be unavailable to attend meetings until early May.

I had already sent a previous complaint regarding Bill McKinney's poor attendance. At the time of my complaint, Bill had missed 11 meetings out of 16, so I hope you consider a different applicant.

As required by ICC Consensus Requirements, my complaint should be answered in writing within 30 days.

Thank you for consideration my views,

Janet Thome President  
Tiny House Alliance USA  
[janet@tinyhouseallianceusa.org](mailto:janet@tinyhouseallianceusa.org)