

May 21, 2025

ICC Board Of Directors
International Code Council
200 Massachusetts Ave NW
Washington, DC 20001

Regarding: Addendum Janet Thome PINS Complaint ICC/THIA 1215-202x, Design, Construction, Inspection and Regulation of Small Residential Units and Tiny Houses for Permanent Occupancy.

Requesting A New PINS From ICC. Failure To Include Trailer Manufacturers, Modular Manufacturers, And Manufactured Home Manufacturers, Transport Carriers, Transport Companies, And Owner Builders In The PINS Stakeholders.

Project Need: The New PINS Fails to Give A Reason That There Was A Need To Include The Small Residential Unit (SRU) In The Title And Scope Of The Standard And The Industry Need For The SRU And Why Tiny Houses Should Be A Subcategory Under The SRU.

Requesting A Work Group On Chassis Provisions.

How The Small Residential Unit Negatively Impacts Tiny Houses On Wheels

Should This New PINS Been Listed In ANSI Standard Actions As A Substantive Change And A New PINS Or Both?

Greetings,

I am adding an addendum to my PINS complaint ICC/THIA 1215-202x, Design, Construction, Inspection and Regulation of Small Residential Units and Tiny Houses for Permanent Occupancy based on an email discussion regarding chassis provisions with the OSMTH 1215 committee.

March 15, 2025 Meeting

The meeting discussed comments from Jeffrey Munsterteiger, National Association of Home Builders (NAHB). One of the topics was the chassis.

He struck out.

~~**PERMANENT CHASSIS. A foundation CHASSIS and transportation system that is an integral part of the TINY HOUSE'S structure and cannot be removed without significant structural modifications., to include drawbar, coupling mechanism, frame, running gear assembly and lights; for modular buildings designed to meet the applicable building code.**~~

~~**In use as a permanent foundation system, anchorage of the building to the foundation is provided to resist the uplift and sliding forces that result from the application of the prescribed loads.**~~

His edit.

CHASSIS. The entire transportation system comprising of the drawbar and coupling mechanism, frame, running gear assembly and lights that meets Federal Motor Vehicle Safety Standards and bears a label applied by a manufacturer that is listed with the National Highway Traffic Safety Administration.

His reason.

Chassis: The National Highway Traffic Safety Administration (NHTSA) is the agency that enforces Federal Motor Vehicle Safety Standards (FMVS). They have a program to list manufacturers which are required to apply labels to trailers attesting to their compliance with federal regulation. A local building code official is not equipped to make such inspections or certifications, and model building codes do not address construction that occurs on movable trailer frames. Text was added requiring that manufacturers of frames tiny houses must be listed by NHTSA and comply with FMVS standards. A code official need only to verify that an appropriate label is attached.

Permanent Chassis: these proposed changes simplify this definition. A chassis is already defined and it doesn't need to be restated. This definition only needs to define what makes a chassis permanent, which is the purpose of this revision.

The Crux Of The Issue: Revealing A Disconnect

I agree with Jeffrey's comments regarding NHTSA requirements, but there is no true consensus in the committee, so I sent direct information from NHTSA to the committee members and we had an email exchange that revealed the crux of the matter and a great disconnect regarding the intention of the standard. I have suggested a work group on the topic of the chassis.

The original intent of the standard was to finally address the immediate need for the tiny house industry, to add provisions for tiny houses on wheels, including chassis provisions, to be adopted into the IRC, recognized as a housing type, resulting into financing for tiny houses on wheels, one of our number one barriers for the tiny house industry.

Tiny houses on wheels are built on prefabricated trailers, or the builders are building the trailers themselves, and owner builders are allowed to build homemade trailers in some states. The structure is integrated to the trailer usually in a permanent manner and the axles and tires stay on after they are transported to their destination, unless an AHJ asks for the axles to be removed.

The Disconnect: The Transport Method As Opposed To A Permanent Chassis

How a few voting members interpret a tiny house on wheels to be is a modular structure built off site and transported on a carrier system. It could be a frame on or off. When it is sited, in both cases, the axles are removed, and with the frame on, the I-Beams are still intact.

That is not a tiny house on wheels, and it is not even a wheeled structure. It is a module transported on a carrier system and it is my understanding that the Modular manufacturers use certified recycled axles from manufactured homes for a one time use that are removed before they are sited on a foundation, so in reality it is a tiny home on a foundation, not a tiny house on wheels.

Now that I understand how some of the voting members interpret a tiny house on wheels, it clarifies it even more that there is no need for the standard at all in the direction it is going because frame on and frame off Modular homes have already existed for over 60 years and longer. The Small Residential Unit will even complicate both the Modular And Manufactured Home industry and that is why stakeholders from those industries should be notified. They are the ones already building a Small Residential Unit, without using the new name.

The Small Residential Unit is also putting limitations on the structures regarding size including width and lengths in the standard which have already been determined for decades.

The Small Residential Unit delivered on a carrier system seems to be replacing tiny homes on wheels, though in reality it is a tiny house on a foundation.

Negative Impact

- If the standard stays in the direction of the Small Residential Unit with a carrier system for transport, (As The Committee's Interpretation For A Tiny House On Wheels) this will negatively impact trailer manufacturers that supply trailers for tiny home builders and will give the business to the transport carriers.
- This will also impact tiny home builders that build tiny homes on wheels on a permanent chassis that could negatively impact their business, because the carrier system used by large manufacturers could dominate the tiny house industry and squeeze out small manufacturers.
- The carrier system is a great method, but it will mainly be used for individuals that own land, this could harm the owner builder and consumer because they often cannot afford to buy both land and the tiny home, so they choose the tiny home on wheels that they could permanently place on leased property, though they still need for it to be mobile, in case they sell it, or move in the future, or if a community is sold, or if the space rent becomes unaffordable.
- This could impact transport companies that deliver tiny houses on wheels, if all the business is directed to the transport carriers.
- The small manufacturer would be squeezed out if they have to buy a carrier system for transportation to compete.

- The Small Residential Unit will stifle the growth for anyone that is in the tiny house industry, including third party agencies, designers, components for the chassis, etc.....
- The Small Residential Unit will stop the growth and progress for tiny houses on wheels and the trickle down effect will be less housing during a crisis in our nation.
- The barrier to financing will remain if the Small Residential Unit takes over the standard.
- Small manufacturers will be squeezed out of the tiny house on wheels industry, because they will not be able to compete in costs with the large manufacturers that will build the Small Residential Unit.
- The zoning issues for tiny houses on wheels will remain.

I Am Requesting A New PINS Notification To Be Re- Published In ANSI Standards Action To Include Trailer Manufacturers, Modular Manufacturers, Manufactured Home Manufacturers, Transport Carriers, And Owner Builders In The PINS Because The PINS Left Out These Very Important Stakeholders Or Should ICC Relist The Standard In ANSI Standards Action As A Substantive Change, new PINS Or Both? The Project Needs To Be Addressed As Well.

The Project Need

The current PINS failed to give any reason that the Small Residential Unit needed to be added to the standard for the industry need for the tiny house industry and they did not disclose that they were positioning the Small Residential Unit, a made up term no one is using in a primary position over Tiny Houses, a codified term in the IRC, placing Tiny Houses as a subcategory under the Small Residential Unit

The standard has both substantive changes and a change of stakeholders that will be affected by the Small Residential Unit direction change of the standard. If you compare both the second and the May 15, 2025 PINS notification, the stakeholders remain the same, and if you look at the entire PINS, you will only see the Small Residential Unit has been added to the title and the scope of the standard in contradiction to the April 2, 2025 meeting notes that incorrectly stated-

"ANSI permits title changes to standards as long as changing the title is not a substantive change."

The meeting notes were approved on May 15, 2025 and I objected to the approval of the notes because it was not accurate. Not one committee member asked to see the comment I was objecting to and it was approved and Karl failed to disclose that a new PINS would be published the very next day, he knew because he is the one that submitted it and it was submitted a few weeks before publication.

When I reached out to ANSI, she stated that ANSI does not address titles in standards, and to summarize, when a standard is being developed, it will require a new PINS if there are substantive changes or if the stakeholders have changed. Both have occurred.

[April 2, 2025 Meeting Notes](#)

There was also a PINS announcing the standard on April 7, 2025 that had the term permanent in front of foundation which was removed on the second PINS. One word evoked a new PINS.

[Link](#)

No one on the committee is building, designing, certifying, or enforcing a Small Residential Unit.

April 21, 2023 PINS Notification

ANSI Standards Action - April 21, 2023

BSR/ICC/THIA 1215-202x, Design, Construction, Inspection and Regulation of Tiny Houses for Permanent Occupancy

Stakeholders: Tiny house builders, building code officials, building product manufacturers, architects, engineers, third-party plan review and inspection agencies, consumer advocates, homeowners and renters.

[Link](#)

May 15, 2025 PINS Notification

New Standard

BSR/ICC/THIA 1215-202x, Design, Construction, Inspection and Regulation of Small Residential Units and Tiny Houses for Permanent Occupancy (new standard)

Stakeholders: Builders including tiny house builders, building code officials, building product manufacturers, architects, engineers, third-party plan review and inspection agencies, consumer advocates, homeowners and renters.

[Link](#)

Requesting A Work Group On The Chassis

Because of the disconnect of the chassis provisions, including transport, and the different ideas of what a tiny house on wheels is, could we please create a work group to gain consensus on the topic?

Thank you for the consideration of my views,

Janet Thome President
Tiny House Alliance USA