

October 13, 2025

International Code Council
CEO John Belcik
200 Massachusetts Ave NW
Washington, DC 20001

Regarding: ICC 1215 Is Violating CP#49-21 – Conforming Codes and Standards to United States Federal Law And International Law: ICC 1215 And Is Promoting An Illegal Transport System For Tiny Houses And Overriding Federal Laws On The Chassis And The Chassis That Is The Carrier System.

Dear John,

I was in many meetings and a few work group sessions that discussed the chassis that is integrated with the house and also used as a carrier system.

I have a 27 email exchange with David Tompos Jr. regarding this subject. He has argued that the carrier of a tiny house would NOT need a VIN number, or registration with SAE or follow the FMVSS, hence why they added an exception in the standard for the carrier system. This is under the transportation section.

He is not correct and the standard is still not acknowledging VIN numbers, registration with SAE, NHTSA, and federal laws for labeling and certification of trailers which are considered a motor vehicle with the integrated chassis.

The standard will put building officials, manufacturers, and consumers in jeopardy because applicable laws already codified are being ignored. This will also cause tax evasion, and illegal trailers on the road that are never in the DOT system.

The committee has created a Data Plate that does not follow federal laws. NHTSA allows self certification of the trailer, but that includes labeling which the committee has ignored the need for.

ICC Is Promoting The Violation Of 49 CFR Part 565—VEHICLE IDENTIFICATION NUMBER (VIN) REQUIREMENTS

[49 CFR 565](#)

ICC Is Promoting The Violation Of 49 CFR Part 571 Which Codifies The FMVSS.

[49 CFR Part 571](#)

ICC Is Promoting The Violation Of 49 U.S.C. § 30112 (a) (1)

49 U.S.C. § 30112 (a) (1)

(a) General.—

(1)

Except as provided in this section, sections [30113](#) and [30114](#) of this title, and subchapter III of this chapter, a person may not manufacture for sale, sell, offer for sale, introduce or deliver for introduction in [interstate commerce](#), or import into the United [States](#), any [motor vehicle](#) or [motor vehicle equipment](#) manufactured on or after the date an applicable [motor vehicle safety standard](#) prescribed under this chapter takes effect unless the vehicle or equipment complies with the standard and is covered by a certification issued under [section 30115 of this title](#).

[Entire Law](#)

[NHTSA Regulations](#)

Jeffrey Munstertieger with NAHB and I gave the committee the accurate information regarding NHTSA, labeling and certification, and it was ignored.

Thank you for looking into this matter.

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