

NHTSA Interpretation Letter: Modular Transport

Mr. Gerald A. Schlegel, Transportation Manufactured Housing, P.O. Box 198, Mason, MI 48854;
Mr. Gerald A. Schlegel
Transportation Manufactured Housing
P.O. Box 198
Mason
MI 48854;

Dear Mr. Schlegel: This is in reply to your letter of December 13, 1971, concerning your conversation with Michael Peskoe regarding 'the provisions of Section 566.5, Manufacturer Identification.' You ask two questions which concern that regulation, the Certification regulations, and regulations concerning 'Vehicles Manufactured in Two or More Stages' (49 CFR Parts 567, 568).; Your first question is whether, 'as a manufacturer of Modular Homes which are built in a factory and then transported on a low-bed type trailer to the job site, are we required to label our units the same as a mobile home?' The requirements for labeling are found in Parts 567 and 568, and are part of the requirement that manufacturers certify compliance with all motor vehicle safety standards applicable to the particular vehicle or item of motor vehicle equipment they manufacture.

Modular homes are not motor vehicles under the National Traffic and Motor Vehicle Safety Act (15 U.S.C. S1381 *et seq*.) and accordingly there are no requirements that they be certified or labeled.;

Your second question is as follows: ' . . . we do manufacture some of these low-bed trailers, they **are strictly for our own use in transporting our modular homes**, and in this case are we required to submit this report and also label any trailers we would build in the future?'

Trailers are motor vehicles under the National Traffic and Motor Vehicle Safety Act and are required to comply with applicable standards. They are also required to be **certified by the manufacturer in accordance with the Certification regulations (Part 567)**, and as a **manufacturer of trailers** you are required to submit the information specified in **Part 566**.; A copy of the National Traffic and Motor Vehicle Safety Act, and Part 566, 567, and 568 are enclosed, as is a notice describing how to obtain a copy of the motor vehicle safety standards.;
Yours truly, Richard B. Dyson, Assistant Chief Counsel