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ICC Board Of Directors
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200 Massachusetts Ave NW
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Revised PIN Request 1215

I am respectfully requesting that the ICC 1215 committee submit a revised PINS notification because, as the standard has been drafted, there have been substantive changes to the standard. This request follows both ICC and ANSI policies.

ANSI Essential Requirements

2.5.1 Project Initiation Notification System (PINS)

At the initiation of a project to develop or revise an American National Standard, 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:

- 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
- identification of the stakeholders (e.g., telecom, consumer, medical, environmental, etc.) likely to be directly impacted by the standard; and
- 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 Previous ICC PINS Published In ANSI Standards Action

ICC (International Code Council)

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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.

Project Need: Tiny houses are growing in popularity as communities look to address affordable housing issues and homebuyers are looking for new housing options. This standard will codify existing requirements for the design, construction, inspection and certification of SRUs and tiny houses used as permanent dwellings into a single standard and address identified gaps in available requirements for foundations and chassis. The 2021 International Residential Code (including Appendix AQ), and ICC/MBI Standards 1200 and 1205 will serve as the initial base documents with references to other existing standards.

Interest Categories: Manufacturer, Builder, Standards Promulgator/Testing Laboratory, User, Consumer, Government Regulator, Insurance

This standard will provide minimum requirements for the design, construction, inspection, certification, and regulatory compliance of small residential units (SRUs) and tiny houses used for permanent occupancy to assure public safety, sustainability, and resilience. The standard will include: consensus definitions for SRUs, tiny houses and related terminology; prescriptive and performance-based compliance methods for SRUs, tiny house foundations and chassis; and plan review, inspection, and certification requirements for SRUs and tiny houses constructed on-site and off-site. The standard will address SRUs and tiny houses built on a foundation and those with wheels and a permanent chassis intended for permanent occupancy. The 2021 International Residential Code (including Appendix AQ), and ICC/MBI Standards 1200 and 1205 will serve as the initial base documents with references to other existing standards. The standard will be written in mandatory code-intended language to support use by manufacturers and adoption by jurisdictions globally. This standard will not address SRUs or tiny houses used for temporary or seasonal occupancy, or tiny house community development or microgrids.

Basis Of My Request

The May 16, 2025 PINS failed to include stakeholders from the transportation sector that not only will be affected by ICC 1215, but could offer much needed expertise to the drafting of the standard.

Stakeholders that were not identified include HUD, DOT, NHTSA, SAE, FMCSA, state troopers, chassis fabricators, mechanical engineers, trailer manufacturers, manufacturers of motor vehicle equipment, motor carrier operators, freight companies, dealers, titling and registration authorities, and tax assessors.

All previous PINS notifications have acknowledged stakeholders from the viewpoint of the tiny house as a building only. As ICC 1215 has been drafted, however, the standard has expanded into areas involving permanent chassis, wheeled structures, transportation-related design considerations, inspection, certification, taxation, and regulatory compliance.

These subjects directly impact stakeholder groups that were not identified in the PINS. They also require expertise from disciplines that were not recognized as stakeholders during project initiation.

The omission of these stakeholders is significant because ICC 1215 now addresses subjects for which these stakeholders possess specialized expertise, including transportation, chassis design, motor vehicle equipment, registration, regulatory compliance, and taxation.

The voting committee does not include representation from any of these transportation-related stakeholder groups despite the standard's expansion into matters affecting chassis design, transportation use, motor vehicle equipment, registration, titling, and taxation. Tax assessors possess expertise regarding how these units are taxed as both personal property and real property. Transportation stakeholders possess expertise regarding the manufacture, transportation, inspection, certification, registration, and regulation of wheeled structures.

As ICC 1215 has developed, the stakeholders likely to be directly impacted by the standard have changed substantively from those identified in the May 16, 2025 PINS. ANSI anticipated this circumstance and specifically requires that a revised PINS be submitted and published when the response to subsection (b) changes substantively during development.

Size Of The Small Residential Unit (SRU)

Though it has not been confirmed in ICC 1215 committee notes, there was a vote to change the SRU to only 600 square feet on a public comment. If that is a change throughout the entirety of the standard and its definition, it should be included in an announcement in ANSI Standard Action, and in the committee meeting notes. That is a substantive change that should be publicized.

Thank you for your consideration,

Respectfully submitted,

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