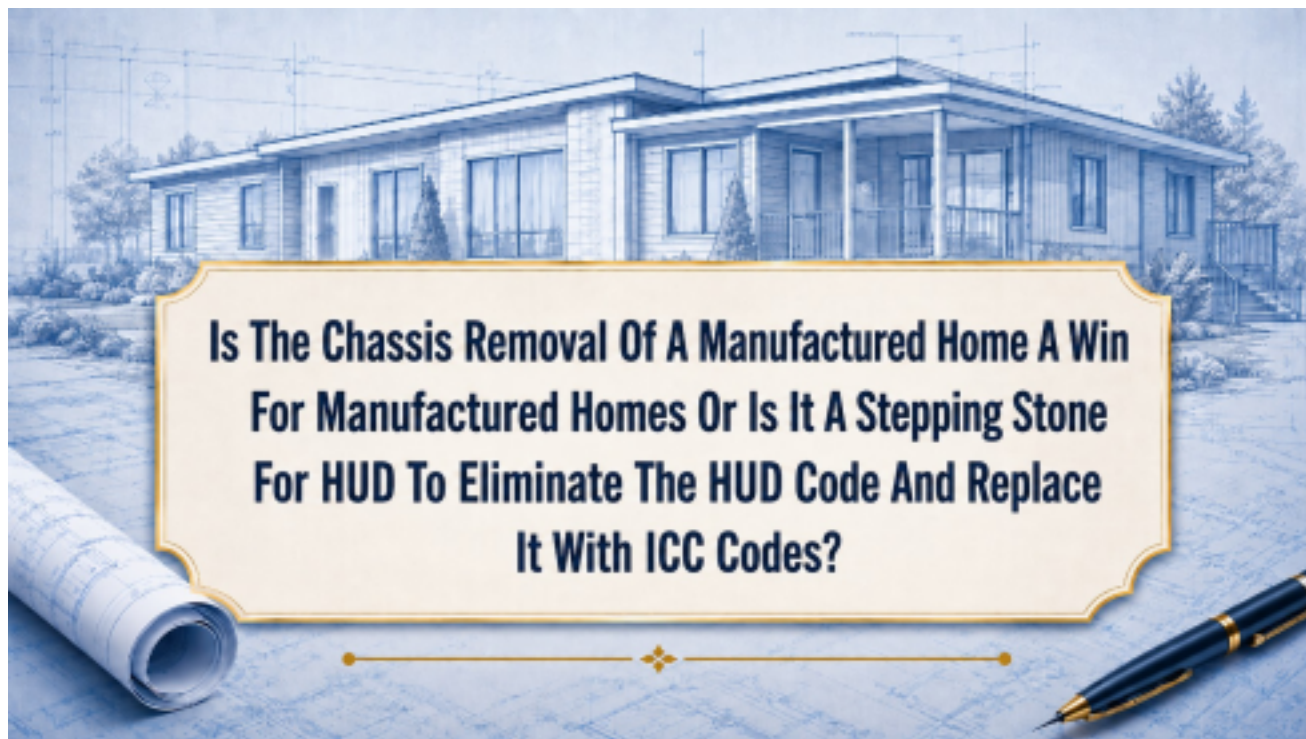




1. THE CENTRAL QUESTION

At first glance, removing the chassis seems like a groundbreaking win for the manufactured housing industry, but I feel it has more to do with actually absorbing manufactured homes under the International Code Council (ICC) umbrella for their absolute market allocation of all housing.

We have a potential of hearing in the future that with the chassis removal and because a manufactured home is already blurring the lines and becoming more like an IRC home, why have 2 types of homes, why have a different certification path, and why not get rid of that big IBTS contract that audits third parties on behalf of HUD, when ICC already has subsidiaries that include certification, accreditation, and that ICCNTA is an IPIA DAPIA approved by the federal government.

It could take years, but in my opinion, it has already been set in motion behind closed doors for at least 8 years that I can trace starting with the 2018 ICC meeting with ICC, NIBS, and MBI to create off-site construction standards. Why are they needed? To rebrand factory built housing to off-site construction for ICC market control with their pay to play system and possibly replace and to **'modernize' the HUD code.**

My opinion comes from direct experience with ICC, ICCNTA, involvement in the ICC 1215, and being a witness to competing standards and standard development that ICC tries to suppress,

The Chassis Removal Should Not Be Viewed In Isolation: It Should Be Considered With My Supportive Documents Alongside:

- **HUD Off-Site Construction Publications:** Promote a **Housing Certification System**, **ICC/MBI 1200-series standards**, and **ICC-ES evaluation reports**; include the recommendation to “**Investigate the relative merits of the HUD Code versus ICC codes for potential regulation of manufactured housing**,” together with the potential for the **HUD Code to be replaced by ICC codes**. These publications also rely on **private organizations with overlapping executives, conflicts of interest, and antitrust concerns**, where the same individuals may help **define the problem, review the research, shape the remedy, and potentially benefit from its implementation**.
- **ICC Motor-Vehicle and HUD Preemption:** ICC’s disregard of **motor-vehicle and HUD preemption**.
- **HUD Complaints and Preemption:** HUD’s failure to address complaints involving **ICC and ICCNTA** or protect HUD preemption from the misappropriation of the HUD Code.
- **ICC 1215 “Ghost Trailer”:** ICC 1215’s promotion of what I refer to as the “**ghost trailer**” while denying the need for VINs and certification labels on the trailer.
- **21st Century ROAD to Housing:** Requires states to treat manufactured homes without a permanent chassis in parity with manufactured homes built on a permanent chassis across financing, title, insurance, manufacture, sale, taxes, transportation, installation, and other areas, and also requires **states to certify that their laws and regulations provide that parity**.
- **National Modular Production Act:** The introduced bill includes a study of a **standardized uniform commercial code for modular homes**, standardized serialization of modules, and coordination with financing incentives—at the same time ICC 1215 is promoting what I refer to as the “**ghost trailer**,” while denying the need for VINs and certification labels on the carrier.

Taken together, these developments are why the chassis removal cannot be treated as a stand-alone technical change and could have much more far-reaching consequences.

[ICC Final Word On Motor Vehicle And HUD Preemption](#)

[ICC 1215 Disregards HUD Preemption](#)

[ICC 1215 Promotes ‘Independent Carrier System’ Ghost Trailer](#)

[ICC 1215: Chassis Silence or Regulatory Coverup?](#)

2. THE FEDERAL HOUSING SYSTEM TAKING SHAPE

HUD NIBS MODX And Pilot Cities That Benefits The ICC Framework

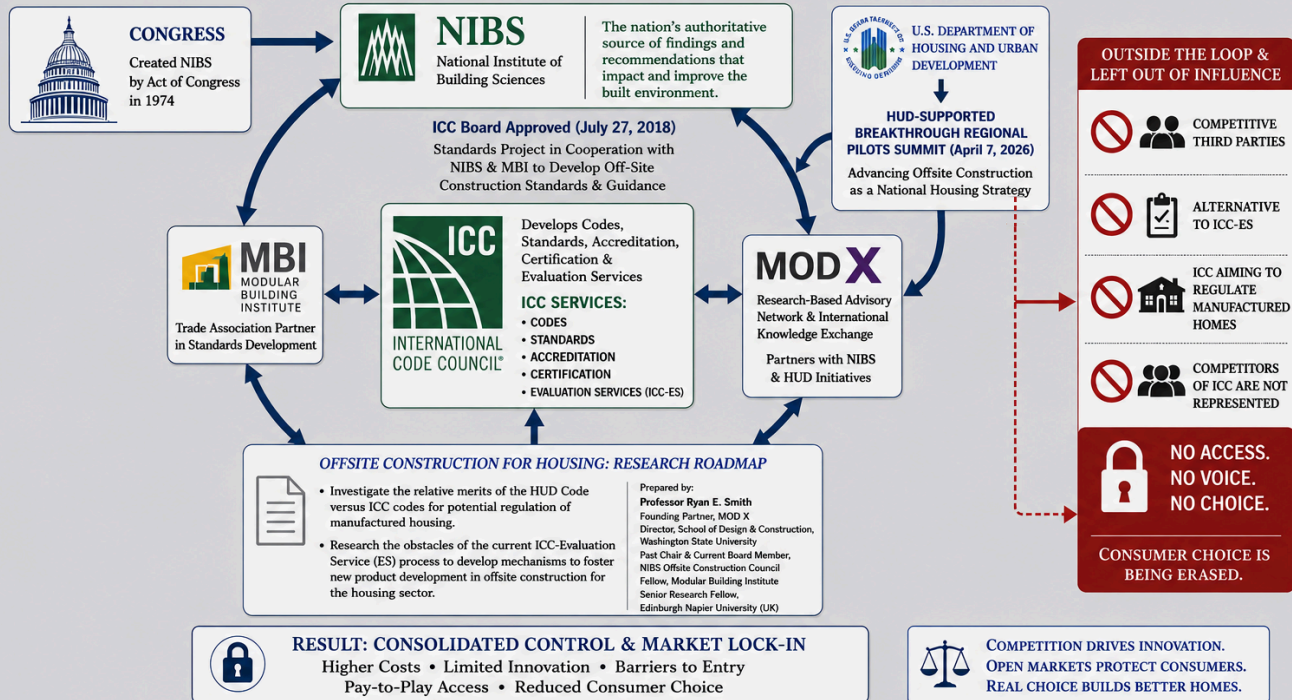
I am not alone in my feelings, and if you want to research this yourself, just follow every move that HUD is making with ICC, NIBS, MODX, and the pilot projects.

You must really keep an eye on the ‘Housing System Certification ‘ that is being promoted through the HUD publications that is promoting NIBS and ICC’s framework with serious conflict of interest and antitrust concerns with overlapping executives. Their plan is lessening consumer choice and leaving out competitors, and where is the cost analysis?

Research The HUD Funded Reports For Off Site Construction

ANOTHER CLOSED LOOP SYSTEM PROMOTING ONLY ICC & THEIR SERVICES

REMOVING CONSUMER CHOICE • CREATING A LOCKED, PAY-TO-PLAY SYSTEM



IT'S TIME FOR TRANSPARENCY, ACCOUNTABILITY & REAL COMPETITION. CONSUMER CHOICE MATTERS.

HUD is fast-tracking ICC/NIBS/MODX dominance with millions in taxpayer-funded reports —Offsite Construction for Housing: Research Roadmap. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, 2023, and HUD's Past, Present, and Future Role in Accelerating U.S. Offsite Construction for Housing: A Comparative Study and Action Plan. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, 2024–2025.2024–2025 Action Plan. These documents, managed by NIBS and authored by MOD X, recommend a new federally sanctioned housing system certification program that expands ICC-ES evaluation services and routes approvals through ICC/MBI 1200 and 1205 standards.

Sole-Source Statutory Advantage Enables Non-Competitive Awards

NIBS benefits from Public Law 93-383 (12 U.S.C. §1701j-2(g)(3)) — a congressional grant of sole-source contracting authority for building-related work. This exempts HUD from standard competitive bidding (FAR Part 6.302-5). positioned to bid.

This statutory edge, combined with personnel overlaps, funnels public money into a self-reinforcing network.

The HUD Off-Site Construction For Housing Research in A Nutshell

Promoting the ICC framework

ICC/MBI 1200 – Standard for Offsite Construction: Planning, Design, Fabrication and Assembly

ICC G5-2019 – Guideline for the Safe Use of ISO Intermodal Shipping Containers

Repurposed as Buildings/Building Components

ICC/MBI 1205 – Standard for Offsite Construction: Inspection and Regulatory Compliance

ICC/MBI 1210 – Standard for MEP Systems, Energy Efficiency and Water Conservation in Offsite Construction CC-ES (Evaluation Service) – the product compliance/testing report process, criticized as slow and costly

ICC Performance Code pathway – the (underused) performance-based code option, discussed at length as a research subtopic

HUD Code — Investigate the relative merits of the HUD Code versus ICC codes for potential regulation of manufactured housing.

New Products — Research obstacles in the current ICC-Evaluation Service (ES) process to develop mechanisms fostering new product development in offsite construction for housing.

Where is the cost analysis?

3. THE FORGOTTEN FEDERAL PRECEDENT: OPERATION BREAKTHROUGH, LEAP, CES AND ASTM E541

The HUD publications did not include crucial successful components of Operation Breakthrough, that included Laboratory Evaluation and Accreditation Program (LEAP) and the Coordinated Evaluation System (CES), was performed under contract to the National Bureau of Standards and finally incorporated into ASTM E 541-75, “Standard Criteria for Agencies Engaged in System Analysis and Compliance Assurance for Manufactured Building.

Building Research at the National Bureau of Standards: See Attachment 1968-1974 • NBS Building Science Series 75

ASTME541 was withdrawn in 2019. I had it revised and reinstated in 2022, and HUD and 11 states reference ASTME541 for third party requirements.

Please see attachments

How The International Code Council Is Weaponizing Certification ASTME541: HUD And State Adoptions Anonymous Third Party Comments And The Acquisition Of NTA , Now Referred To As ICCNTA And The Cost To Change To ICC/MBI 1205 Which Requires ISO Accreditation

The HUD Past, Present, And Future Role In Accelerating U. S. Construction For Housing In A Nutshell

The Report Omits Crucial Data About Operation Breakthrough

The HUD report's Operation Breakthrough case study covers the housing prototype demonstration, the Guide Criteria, HUD-NBS collaboration on certification, and the site/industry partnerships — but it leaves out the parallel regulatory-infrastructure work NBS Series 75 documents in detail:

1. LEAP (Laboratory Evaluation and Accreditation Program) — launched January 1971 under James O. Bryson to accredit the labs and agencies doing compliance evaluation for manufactured buildings. Not mentioned.
2. ASTM E541 (1975) — the national consensus standard that came directly out of LEAP's research reports via ASTM Committee E32 ("Criteria for Evaluating Agencies Engaged in Systems Analysis and Compliance Assurance for Manufactured Building"), piloted in Massachusetts and Maryland. Not mentioned.
3. CES (Coordinated Evaluation System) — headed by Robert D. Dikkers, requested by both NCSBCS and the Executive Office of the President, producing model evaluation/approval/inspection documents adopted by several states. Not mentioned.
4. NCSBCS and the state-regulatory track — the 1967 founding story (Gene Rowland, the Wisconsin meeting), NBS's role as NCSBCS secretariat, and the four model statutes (Manufactured Building Act, Mobile Home Act, etc.). Not mentioned.
5. The 1972 Center for Building Technology reorganization — the org-chart split that formalized these two tracks (Office of Housing Technology under Gross vs. Office of Building Standards and Codes under Rowland). Not mentioned.

Why it matters: LEAP, ASTM E541, and CES were the concrete, standards-body-level mechanisms that translated Operation Breakthrough's performance criteria into durable, adoptable regulatory tools — arguably the closest historical precedent to the "housing system certification program" the HUD report itself recommends reviving in Part A. Citing them would have strengthened the report's own argument by showing that piece already has a working 1970s precedent, not just the Guide Criteria and the eventual 1976 HUD Code.

See Attached

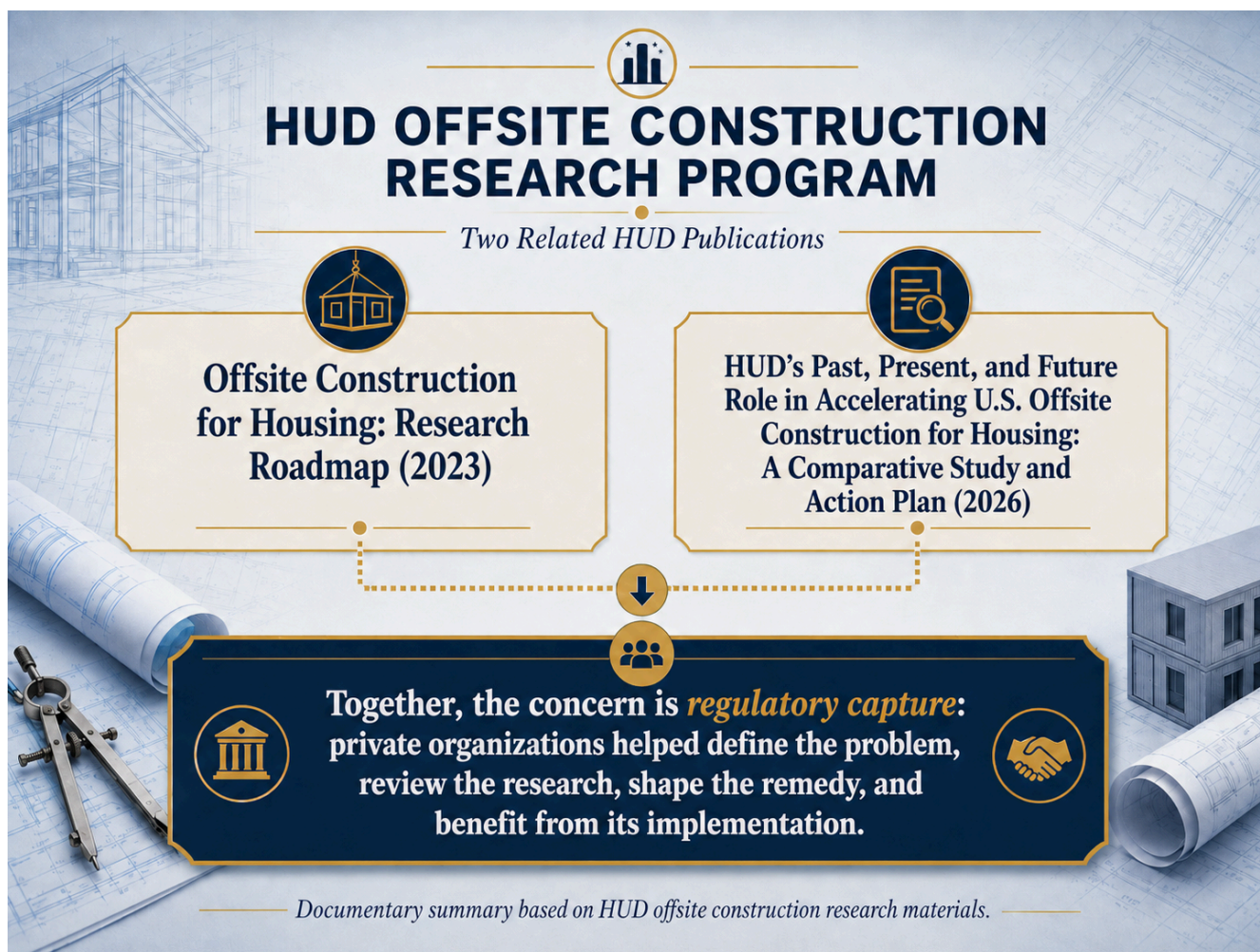
Building Research at the National Bureau of Standards 1968-1974 • NBS Building Science Series 75

4. CONFLICTS OF INTEREST, VERTICAL INTEGRATION AND REGULATORY CAPTURE

Conflicts of Interest in HUD's Offsite Construction Research

The central concern is that the federal government is partnering with and relying on organizations that are already deeply embedded in the very regulatory and certification structure being examined. ICC is not simply a code and standards developer; it is a vertically integrated trade association whose corporate structure includes more services through their subsidiaries with training, evaluation reports, inspection, certification, accreditation, and more. At the same time, ICC representatives David Tompos and Ryan Colker served as both **Project Partners** and **Peer Reviewers** of the 2026 HUD Action Plan.

That creates a serious conflict-of-interest and self-review concern: the same institutional network



that develops and administers private regulatory systems is helping shape federal research and recommendations about how those systems should evolve. MBI adds another layer, because it jointly developed and co-branded the ICC/MBI 1200-series standards with ICC, while MBI Executive Director Tom Hardiman is also listed as a Project Partner in the 2026 Action Plan.

The broader policy concern is lessening competition and consumer choice. The Action Plan recommends federal award criteria built around vertically integrated housing-delivery models, while ICC itself already operates through a vertically integrated structure. If federal policy increasingly favors systems, standards, certification pathways, and delivery models controlled by the same small group of organizations, smaller independent manufacturers, builders, evaluators, and alternative standards systems may face greater barriers to entry. That can reduce competition, narrow consumer choice, and concentrate regulatory influence in a limited private network.

Taken together, the concern is regulatory capture: federal agencies risk becoming dependent on a vertically integrated trade association and its closely connected partners for the expertise, standards, peer review, certification framework, and policy solutions used to regulate the same market. The result is a system in which private organizations with a direct institutional interest in the outcome are positioned to help define the problem, review the research, shape the remedy, and potentially benefit

from its implementation.



“When a regulatory agency becomes ‘captured’ by the organizations it regulates, the public loses.” Regulatory capture occurs when private interests gain outsized influence over the agencies responsible for overseeing them. When regulators become overly dependent on

industry representatives for information and policy direction, the resulting rules can begin to reflect private interests rather than broader public goals.

The deeper concern is who gets to define the problem, provide the expertise, shape the policy response, and influence the rules that govern the market. When the same private organizations occupy multiple roles in research, training, code and standards development, evaluation reports, certification, accreditation, policy advice, and implementation, competition and consumer choice can be reduced while institutional influence becomes increasingly concentrated.

See Attachment: Conflicts of Interest, Vertical Integration, and Regulatory Capture Concerns in HUD’s Offsite Construction Research Program

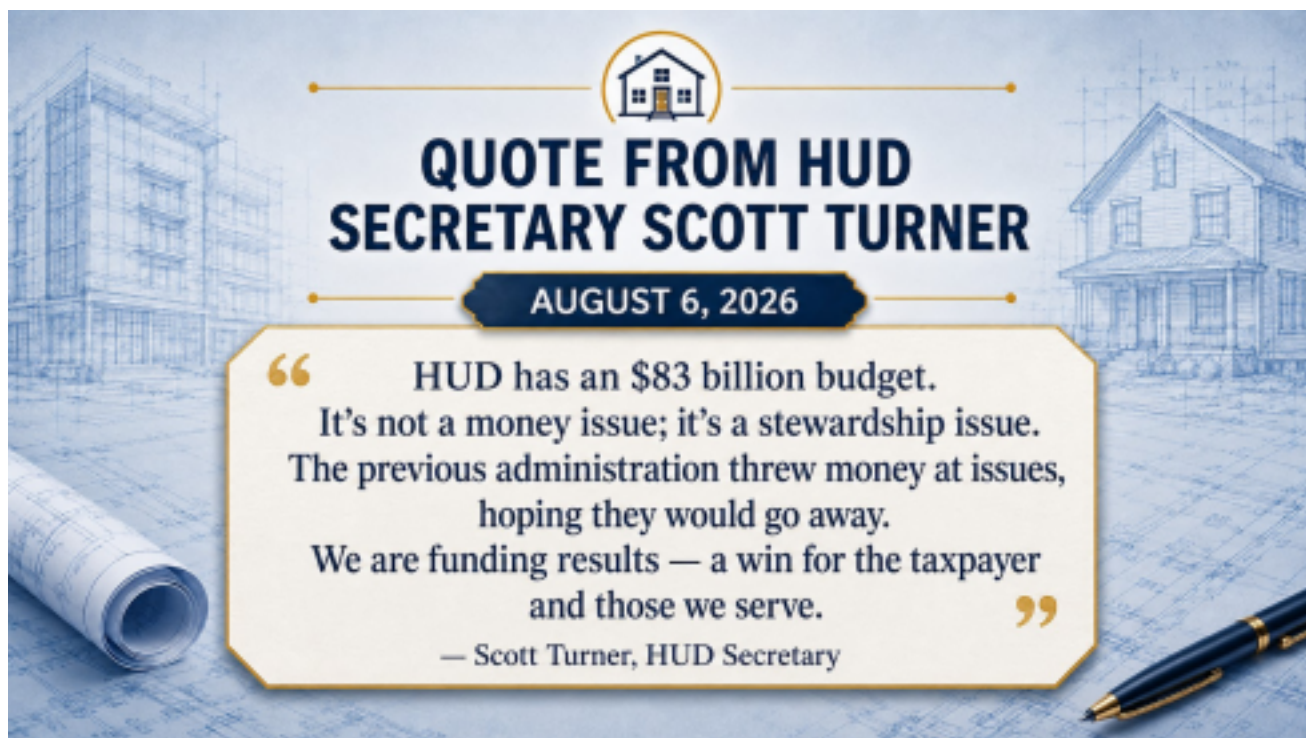


Offsite Construction for Housing: Research Roadmap. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, 2023.

HUD's Past, Present, and Future Role in Accelerating U.S. Offsite Construction for Housing: A Comparative Study and Action Plan. U.S. Department of Housing and Urban Development, Office of Policy Development and Research, 2024–2025.

5. FEDERAL STEWARDSHIP, ACCOUNTABILITY AND RESEARCH FUNDING

HUD Secretary Scott Turner August 7, 2026



On August 6, 2026, HUD Secretary Scott Turner stated on facebook- “HUD has an \$83 billion budget. It’s not a money issue; it’s a stewardship issue. The previous administration threw money at issues, hoping they would go away. We are funding results — a win for the taxpayer and those we serve.”

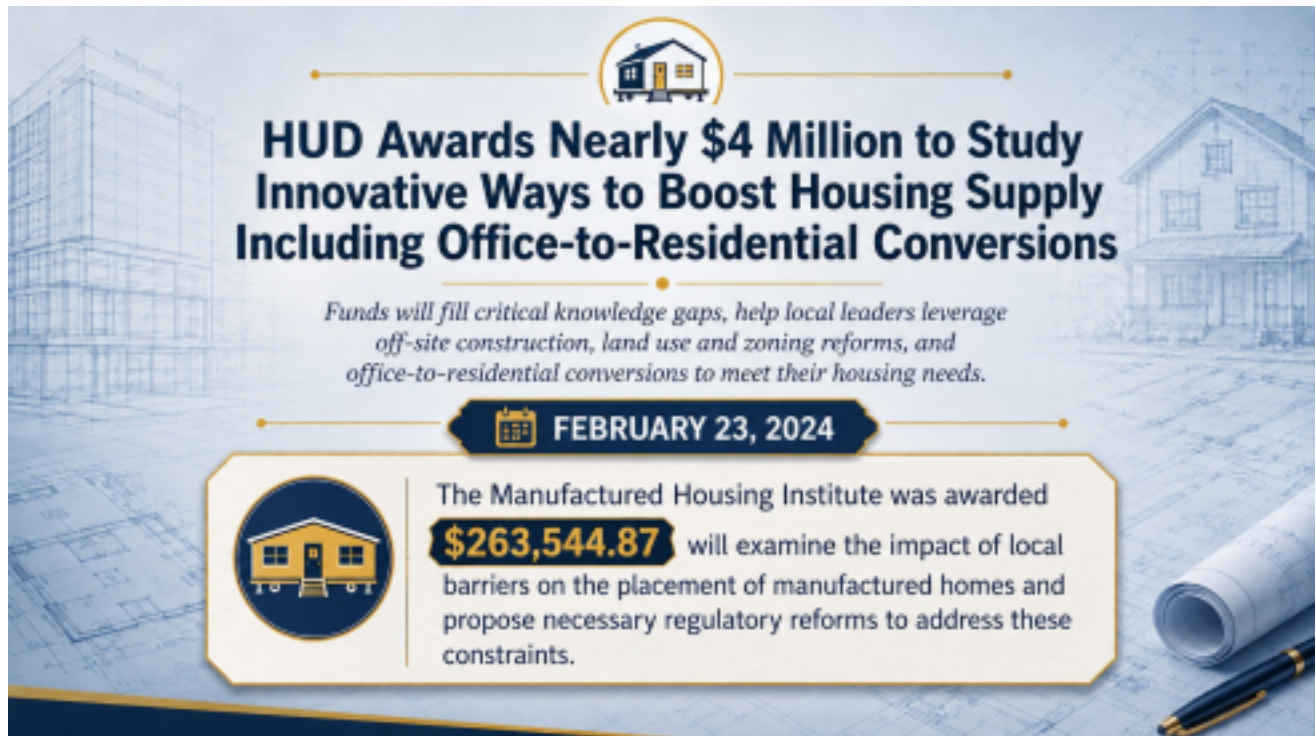
More HUD News

HUD Fails to Address Critical Audit Warnings on Housing Assistance

The Department of Housing and Urban Development is failing to address critical vulnerabilities in how it manages billions of dollars in federal housing assistance, according to a new Government Accountability Office assessment. HUD open recommendations that were flagged as priorities more than a year ago remain unimplemented, creating persistent risks in disaster recovery funding, affordable housing financing, and information technology security.

The GAO letter, released publicly this month, underscores a fundamental accountability gap. HUD has not implemented a single priority recommendation since May 2025, even as the agency oversees programs that touch nearly every American community.

[Source Legis 1](#)



The HUD awards below include funds for MHI for yet more ‘research’ .

HUD Awards Nearly \$4 Million to Study Innovative Ways to Boost Housing Supply Including Office-to Residential Conversion: Feb 23, 2024

[Hud Archive](#)

HUD Announces Research Grant Opportunity to Study Off-site Construction and Land Use Reforms: June 21, 2023

[Hud Archive](#)

MHI Funds From HUD Should Be Scrutinized

Will their ‘**new research**’ reveal anything new regarding manufactured housing that they do not already know that they have already submitted as a trade association to HUD over and over again without change?

Will The Research Finally Revreal That The Tiny House Industry Wants To Carve Out Their Own Lane?

Federal Register Manufactured Home Procedural and Enforcement Regulations;

6. TINY HOUSES: A CASE STUDY OF THE REGULATORY CONFLICT

Clarifying the Exemption for Manufacture of Recreational Vehicles

The HUD final rule for the RV exemption had 5300 comments and a lot were about tiny homes. HUD stated-

“HUD currently regulates as manufactured housing only those structures that are built on a permanent chassis and that “in traveling mode, [are] eight body feet or more in width or forty body feet or more in length or, when erected on site, [are] three hundred twenty or more square feet.” Accordingly, HUD lacks jurisdiction to regulate any tiny home that is less than eight body feet in width, 40 body feet in length, or 320 square feet, or any tiny home that is built on a foundation without a permanent chassis. While this statutorily precludes HUD from regulating many tiny homes, manufacturers can voluntarily opt-in to regulation by HUD (See 42 U.S.C. 5402(6)).

That said, HUD is considering whether it should develop Federal Manufactured Home Construction and Safety Standards to allow manufactured homes with reduced dimensions and design requirements to be built to a national preemptive HUD standard. Additionally, the International Code Council (ICC) has recently considered a “tiny house appendix,” which is incorporated into the 2018 International Residential Code. HUD will consider other appropriate measures, including potential rulemaking related to tiny homes, as it receives new information.”

[HUD Final Rule](#)



Current State Of The Tiny House Industry Snapshot

The tiny house industry is stuck between HUD, RVIA, and ICC. RVIA must lobby against tiny house bills if they are built to RV standards and associated with housing.

HUD has chosen NOT to regulate tiny houses separately from manufactured homes and RVs, and has NOT addressed the needs of small manufacturers that could NOT afford 100% in plant inspection.

Code amendments that would have added chassis provisions to tiny houses have failed 3 times in 10 years, in 3 code cycles. There is an ICC standard currently being drafted that was supposed to progress the tiny house industry, but it will not.

ICC 1215 – Design, Construction, Inspection and Regulation of Small Residential Units and Tiny Houses for Permanent Occupancy

The ICC/THIA 1215 standard was introduced under the banner of regulating tiny houses, but in practice it has redirected and subordinated them beneath an arbitrary category—the Small Residential Unit (SRU). Rather than advancing the existing, codified recognition of tiny houses, the standard elevates the Small Residential Unit into a primary regulatory position, displacing

tiny houses as a subcategory underneath the SRU and severing them from established federal and state compliance frameworks. This detour strips tiny houses on wheels of their lawful motor-vehicle compliance pathway, fragments regulatory authority, and replaces a working, recognized system with a new construct that lacks statutory grounding, uniform adoption, or clear placement authority. The result is not clarity or safety, but regulatory confusion, delayed approval, and the effective hijacking of tiny houses by a category that does not exist in code.

ICC Press Release Introducing The Tiny House Standard

Short summary of the Small Residential Unit issue

There has been a great debate in the OSMT 1215 committee regarding the Small Residential Unit takeover of the standard which is the agenda of ICC.

Definitions In ICC 1215

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.

TINY HOUSE. A SMALL RESIDENTIAL UNIT 400 square feet or less with or without a PERMANENT CHASSIS system

Note: There has been discussion about changing the size down to 600 square feet but that has not been reflected in meeting notes that I have seen. That changes nothing.

ASTM E06.26 Tiny Houses

ICC and the Tiny Home Industry Association (THIA) disrupted the approval of a committee for tiny houses with ASTM International for one year after we had the interest of Colorado, New Hampshire, Canada, Australia, and Europe. The ICC CEO was successful in overturning the unanimous COTCO approved committee on tiny houses after we went through all the rigorous steps and industry consensus to have the committee approved and even had initial collaboration arranged with ICC.

Their claims included an I-code change to Appendix AQ Tiny Houses that was never submitted, duplication and that everything was already accomplished for tiny houses. The ICC CEO stated;

“If a unit is built on wheels and a permanent chassis, and if one of the following conditions is met—greater than or equal to 8 feet wide, greater than or equal to 40 feet in length, or 320 square feet or more— then the HUD Manufactured Home Standards must be followed

unless the manufacturer elects to proactively construct the unit as a modular home. In that case, it must comply with requirements based on a nationally recognized code or equivalent requirements recognized by the HUD Secretary.

The codes currently recognized are the predecessors to the IRC. The requirement specifically calls for a code (not a standard) or equivalent requirements, which by nature would mean duplication of the content covered in the IRC.”

Note: What he was referring to is § 3282.12 Excluded structures—modular homes that I previously wrote about. What he did not cover is that ASTM standards are referenced not only in the IRC, IBC, and state and local codes that become a part of their code and are included in ICC code criteria for referenced standards.

ICC also stated-”If built off-site, ICC/MBI Standards 1200 and 1205 govern the process for plan review, inspection, quality assurance, and certification.”

ICC does not have the authority to police or in force compliance to their own codes and standards. They chose to remove all tiny home terms from the standard after the IBC disapproval. They are voluntary consensus standards that become enforceable after they are adopted.

The first question that was asked at the IBC hearing when ICC/MBI 1200 and 1205 were turned down was: ”Tom, by design, by adopting this particle standard, you intend to disrupt the certification programs that are in the 30 states that have their own program.”

At the time of the ICC objection, I had advocated for the revision and reinstatement of ASTM E541 that had been withdrawn by accident that has now been published in 2022 that is in state statutes in over 10 states and referenced that would supersede an adopted standard, even as a withdrawn standard. HUD also references ASTM E541 for their 3rd party requirements that certify manufactured homes.

ICC does not exclusively ‘govern certification’ as they stated, there are alternatives that have been in place for decades long before ICC/MBI 1205 was developed.

Currently both the state of Virginia and Utah allow for compliance to either ASTM E541 or ICC/MBI 1205.

After a long year of debate and overcoming all their objections, we had a hearing with COTCO, and we were granted a subcommittee for tiny houses.

Shortly after, ICC announced the ICC 1215 committee to develop a tiny house standard, and then the tiny house code failed again.

ICC is duplicating the ASTM tiny house development which raises concerns with WTO Coherence and ANSI Essential Requirements.

ICC is co-branding the ICC 1215 standard with THIA and the committee is dominated by THIA board members. It is important to note that ICCNTA employee David Tompos Sr. was also on the board of THIA and a voting member of ICC 1215 representing the standard developer category when the committee was first established.

[Tiny House Code Turned Down At ICC For 3rd Time](#)

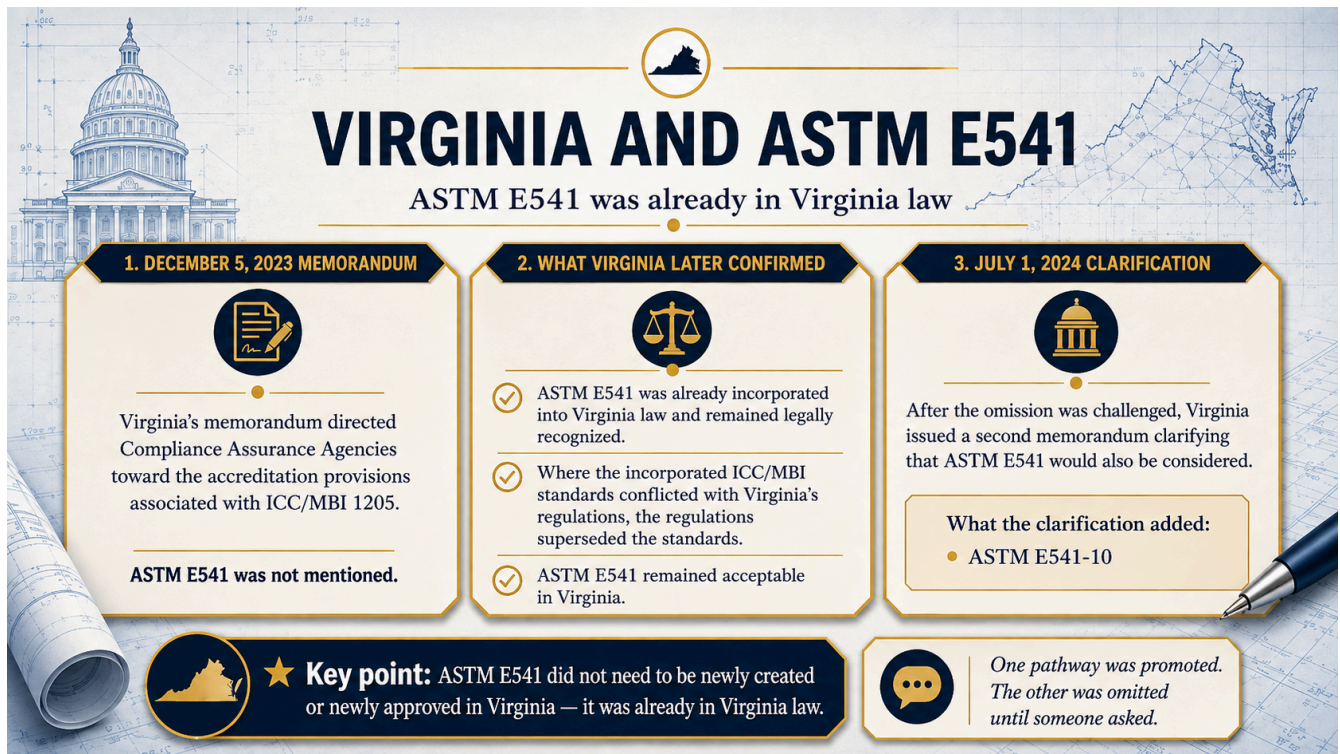
[ICC 1215 Hides Legal Path For Tiny Houses On Wheels](#)

[ICC 1215 Forward Clash With HUD’s Authority On Tiny Houses](#)

Factoring This Altogether

ICC's disregard of motor-vehicle and HUD preemption. ICC is advancing provisions that affect transportation while disregarding federal motor-vehicle requirements and HUD preemption.

- HUD's failure to intervene. HUD has not acted on complaints involving ICC and ICCNTA and, at the same time, has not protected HUD preemption against what you describe as the misappropriation of the HUD Code.
- The proposed National Modular Production Act. Section 4 would authorize a grant to study a "standardized uniform commercial code for modular homes," including standardized serialization of modules and coordination of that code with financing incentives. That adds another potential federal pathway toward nationwide standardization of modular construction.
- The ICC 1215 "ghost trailer" issue. At the same time that federal legislation is considering standardized serialization, ICC 1215 is advancing an independent carrier concept while ICC has denied the need for VINs and certification labels on the trailer. That creates a direct tension between increasing federal interest in serialization and ICC's treatment of the transportation platform.
- The 21st Century ROAD to Housing requirements and the Housing Certification System. Title III requires states to place manufactured homes without a permanent chassis in parity with manufactured homes built on a permanent chassis across financing, title, insurance, manufacture, sale, taxes, transportation, installation, and other areas. At the same time, HUD publications are promoting a Housing Certification System. Those developments belong in the same overall picture because they simultaneously alter the legal distinction of manufactured housing and advance a new certification framework.



Summary

Taken as a whole, the evidence points to a broader restructuring of the regulatory and certification landscape for manufactured housing. The central concern is not any one standard, memorandum, research project, or organization by itself, but the cumulative effect of those developments when they begin to move in the same direction.

What emerges is a system in which regulatory influence, certification authority, and market access can become increasingly concentrated, while established alternatives receive less visibility and smaller participants face greater pressure to conform. That is the broader concern tying the evidence together: whether the direction of federal policy is preserving genuine competition and consumer choice, or gradually narrowing the field around a more centralized private regulatory framework.

Key Points

- HUD-funded off-site construction research is examining the relationship between the HUD Code and ICC codes, identifying ICC-ES and ICC/MBI standards as part of the off-site construction framework, and advancing Housing System Certification concepts through organizations already involved in code development, evaluation, accreditation, inspection, certification, standards development, and implementation.
- The historical record is equally important. Operation Breakthrough did not end with housing prototypes and performance criteria. The National Bureau of Standards developed LEAP and CES, and that work helped lead to ASTM E541 as a national consensus standard for agencies engaged in systems analysis and compliance assurance for manufactured buildings. Those regulatory and certification mechanisms are highly relevant to today's discussion, yet the

modern HUD research examined in this report omits LEAP, CES, and ASTM E541.

- That omission matters because it is not only historical. It continues in the present. ASTM E541 was already incorporated into Virginia law and remained a legally recognized accreditation pathway, yet Virginia's December 5, 2023 implementation memorandum directed Compliance Assurance Agencies toward the accreditation provisions associated with ICC/MBI 1205 and did not mention ASTM E541.
- Virginia later confirmed that ASTM E541 remained acceptable and that where the incorporated ICC/MBI standards conflicted with Virginia's regulations, the regulations superseded the standards. Only after the omission was challenged did Virginia issue a second memorandum clarifying that ASTM E541 would also be considered.
- Had that omission not been corrected, small third-party agencies could have been left believing they had to abandon an existing lawful pathway and incur substantial, and for some unaffordable, costs to change accreditation in order to remain in the program.
- The issue is not only about developing new construction methods. It is also about **who controls the regulatory infrastructure surrounding those methods**. ICC is involved in code development, evaluation services, accreditation, inspection, certification, conformity assessment, and standards development, while ICC representatives and closely connected organizations have also participated in the federal research and policy process examining how off-site housing regulation should evolve.
- This raises broader concerns about competition and consumer choice. If federal policy increasingly favors standards, certification pathways, evaluation systems, and housing-delivery models controlled by the same limited network of organizations, independent manufacturers, builders, evaluators, small third-party agencies, and competing standards systems may face greater barriers to participation.
- The result could be a more concentrated regulatory environment in which the same organizations are positioned to **define the problem, review the research, shape the remedy, and benefit from its implementation**.

Closing

The removal of the permanent chassis matters because it could further blur the regulatory boundary between HUD Code manufactured housing and modular homes. At the same time, a broader ICC-centered Housing Certification System and regulatory framework is being developed and promoted through federal research, while existing systems such as ASTM E541 are being omitted or pushed out of view.

The larger picture also includes ICC's disregard of motor-vehicle and HUD preemption, HUD's failure to address complaints involving ICC and ICCNTA or protect HUD preemption, the proposed National Modular Production Act and its study of a standardized uniform commercial code for modular homes, and ICC 1215's promotion of what I refer to as the "ghost trailer" while denying the need for VINs and certification labels on the trailer.

At the federal level, the 21st Century ROAD to Housing requirements go even further by requiring states to treat manufactured homes without a permanent chassis in parity with manufactured homes built on a permanent chassis across financing, title, insurance, manufacture, sale, taxes, transportation, installation, and other areas. At the same time, HUD publications are promoting a Housing Certification System.

That Housing Certification System could ultimately have a direct effect on ASTM E541 because ASTM E541 is already part of HUD's third-party requirements for the certification of

manufactured homes under the HUD Code. If a new federally promoted certification framework becomes the preferred or dominant system, ASTM E541 could be displaced entirely, removing an existing third-party standard from the HUD manufactured-housing certification structure itself.

Taken together, these developments raise a much larger concern about the future of the HUD manufactured-housing system.

The chassis removal should not be viewed as an isolated technical change, but as part of a broader shift involving certification, transportation, preemption, serialization, financing, competition, consumer choice, the survival of affordable third-party pathways, and who ultimately controls the regulatory framework for manufactured housing.

If that distinction continues to disappear, while a new Housing Certification System also displaces ASTM E541 from the existing HUD third-party certification structure, the question is whether the separate HUD manufactured-housing system will eventually be portrayed as unnecessary.

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Author's Statement and Disclaimer

I was a **proponent who spearheaded the tiny-house effort within ASTM**, working collaboratively to establish the **E06.26 Tiny Houses Subcommittee** under the Committee on Performance of Buildings. I currently serve as **Membership Secretary** for the subcommittee.

Disclaimer: *I do not represent ASTM International, and the views, findings, and conclusions expressed in this document are my own, based on my own experience, experience, public information and independent research. This submission is made in my individual capacity as President of Tiny House Alliance USA, in support of transparency, lawful compliance, and open participation in standards development.*