



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

May 5, 2021

21-IW1-AC
NEW

ALL MANUFACTURED HOME MANUFACTURERS

Dear Manufacturer:

To promote the purposes of the National Manufactured Housing Construction and Safety Standards Act of 1974 (Act), as amended, and assist the manufactured housing industry that is currently faced with the swinging exterior passage door supply chain challenges, the U.S. Department of Housing and Urban Development (HUD) issues this Alternative Construction (AC) letter under the terms and conditions stated herein, where no affirmative action is needed to protect the public interest. In accordance with 24 Code of Federal Regulations (CFR) 3282.14(b), HUD has determined that compliance with specific standards stated herein would be unreasonable due to material shortages and the COVID-19 pandemic. Specifically, the supply chain is currently unable to supply swinging exterior passage doors that conform to certain standards within 24 CFR part 3280 titled "Manufactured Home Construction and Safety Standards" (Standards). These supply chain issues, caused by the COVID-19 pandemic, has resulted in an industry-wide request for HUD to issue an AC letter specific to swinging exterior passage doors.

This AC letter is for the production of manufactured homes at any Production Inspection Primary Inspection Agency (PIPA) certified manufactured home production facility until December 31, 2021, and includes an unlimited number of manufactured homes that may be constructed.

The swinging exterior passage doors will be certified in accordance with the following direct alternative standard:

- ANSI Z97.1-2015, Safety Glazing Materials Used in Buildings - Safety Performance Specifications and Methods of Test

HUD concludes that the above-mentioned standard meets or exceeds the following standard incorporated by reference in 24 CFR §3280.4 of the Standards:

- §3280.113(c) – ANSI Z97.1-2004, Safety Glazing Materials Used in Buildings - Safety Performance Specifications and Methods of Test

The swinging exterior passage doors will further be certified in accordance with the following general standards:

- AAMA/WDMA/CSA 101/I.S.2/A440-17, North American Fenestration Standard/Specification for Windows, Doors, and Skylights, or ANSI/AMD 100-2013, Structural Performance Ratings of Side-Hinged Exterior Doors (SHEDs) and Procedures for Component Substitution - for design, testing and labeling;
- ASTM E283-04(2012), Standard Test Method for Determining Rate of Air Leakage Through Exterior Windows, Skylights, Curtain Walls, and Doors Under Specified Pressure Differences Across the Specimen - for air leakage related to thermal protection;
- ASTM E330/E330M-14(2014), Standard Test Method for Structural Performance of Exterior Windows, Doors, Skylights and Curtain Walls by Uniform Static Air Pressure Difference - for structural performance;
- ASTM E331-00(2009), Standard Test Method for Water Penetration of Exterior Windows, Skylights, Doors, and Curtain Walls by Uniform Static Air Pressure Difference - for water penetration as it relates to materials and methods;
- NFRC 100, 2004, Procedure for Determining Fenestration Product U-factors - for thermal performance (U-values) related to thermal protection; and
- NFRC 200, 2004, Procedure for Determining Fenestration Product Solar Heat Gain Coefficient and Visible Transmittance at Normal Incidence - for solar heat gain and visible transmittance related to thermal protection.

HUD concludes that the above-mentioned standards meet or exceed the following standards incorporated by reference in 24 CFR §3280.4 of the Standards:

- §3280.304(b)(1) – ANSI/AAMA/NWWDA 101/I.S.2-97, Voluntary Specifications for Aluminum, Vinyl (PVC), Wood Windows and Glass Doors, and ANSI Z97.1-2004, Safety Glazing Materials Used in Buildings - Safety Performance Specifications and Methods of Test;
- §3280.405(b) – AAMA 1702.2-95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing;
- §3280.405(c) –NWWDA I.S.4-81, Water Repellent Preservative Non-Pressure Treatment for Millwork;
- §3280.405(e) – AAMA 1702.2-95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing;
- §3280.405(e)(1) –ANSI Z34.1-1993, Third Party Certification Programs for Products, Processes and Service;
- §3280.404(e)(2) – AAMA 1702.2-95, Voluntary Standard Swinging Exterior Passage Door for Utilization in Manufactured Housing; and
- §3280.508(e) – AAMA 1503.1-1988 for test methods for Thermal Transmittance and Condensation.

This AC letter shall no longer be valid on or after January 1, 2022.

As a reminder, all AC manufactured homes built must have the letters “AC” in the serial number stamped on the manufactured home’s chassis and in all official paperwork.

HUD has determined that the issuance of this AC letter is consistent with the objectives of the National Manufactured Housing Construction and Safety Standards Act of 1974, 42 U.S.C. §5401, *et seq.* In accordance with 24 CFR § 3282.14(c) of the Manufactured Home Procedural and Enforcement Regulations (Regulations), HUD will not take enforcement action against the manufacturer for violations of 24 CFR §§ 3280.113(c), 304(b)(1), 405(b), (c), (e)(1)-(2), and 3280.508(e), insofar as these regulations reference a specific referenced standard related to swinging exterior passage doors, as long as the manufacturer meets the following requirements:

1. Before any manufactured homes can be built in accordance with this AC letter, the manufacturer shall inform HUD and its IPIA and Design Approval Primary Inspection Agency (DAPIA) of its need and option to use this AC letter. The notification to HUD, including the specific production facilities to be included, can be sent via email to:

MHSreporting@HUD.gov.

2. This AC letter is not model specific. Reapproval of all model and construction drawings is not necessary as the alternative swinging exterior passage door standards accepted in the AC letter is in lieu of the applicable swinging exterior passage door standards under 24 CFR part 3280. This AC letter only permits nonconformance with of 24 CFR §§ 3280.113(c), 304(b)(1), 405(b), (c), (e)(1)-(2), and 3280.508(e), as they relate to swinging exterior passage doors and does not permit nonconformance with any other regulations. The swinging exterior passage doors will be certified in accordance with the following standards:
 - ANSI Z97.1-2015, Safety Glazing Materials Used in Buildings - Safety Performance Specifications and Methods of Test;
 - AAMA/WDMA/CSA 101/I.S.2/A440-17, North American Fenestration Standard/Specification for Windows, Doors, and Skylights, or AMD 100-2013, Structural Performance Ratings of Side-Hinged Exterior Doors (SHEDs) and Procedures for Component Substitution - for design, testing and labeling;
 - ASTM E283-04(2012), Standard Test Method for Determining Rate of Air Leakage Through Exterior Windows, Skylights, Curtain Walls, and Doors Under Specified Pressure Differences Across the Specimen - for air leakage related to thermal protection;
 - ASTM E330/E330M-14(2014), Standard Test Method for Structural Performance of Exterior Windows, Doors, Skylights and Curtain Walls by Uniform Static Air Pressure Difference - for structural performance;
 - ASTM E331-00(2009), Standard Test Method for Water Penetration of Exterior Windows, Skylights, Doors, and Curtain Walls by Uniform Static Air Pressure Difference - for water penetration as it relates to materials and methods;

HUD's decision does not affect any rights that manufactured home purchasers may have under the Act. This decision is limited solely to the subject request and only applies to the manufacturer's manufacturing operations that have been certified to build manufactured homes.

Please reference HUD File No. 21-IW1-AC in any correspondence about this specific AC approval. If you have any questions concerning this matter, please contact Mr. Jason McJury of this office at (202) 402-2480 or by email at Jason.C.McJury@hud.gov.

Sincerely,

5/5/2021

X 

Teresa B. Payne, Administrator
Office of Manufactured Housing Programs
Signed by: TERESA PAYNE

Enclosures

cc: IBTS; ALL SAAs; ALL IPIAs; ALL DAPIAs

