

Teresa B. Payne, Administrator
Office of Manufactured Housing Programs, Office of Housing
U.S. Department of Housing and Urban Development
451 7th Street SW
Washington DC 20410

RE: Manufactured Home Construction and Safety Standards Proposed Rule (FR 2020-01473)

Dear Administrator Payne,

On behalf of the Board of Directors and members of the Modular Building Institute, I am writing to you today to request an extension to the public comment period associated with the Manufactured Home Construction and Safety Standards Proposed Rule (FR 2020-01473)(Proposed Rule). Due to the current Presidentially-declared National Emergency in response to the outbreak of COVID-19, the Department of Housing and Urban Development should extend the comment period for this Proposed Rule for an additional 60-days to give stakeholders ample opportunity to coordinate their comments as state governments mandate the implementation of social distancing guidelines provided by the Center for Disease Control and Prevention (CDC).

As the international trade association for the modular building industry, we have a number of concerns that the Proposed Rule is an unwarranted encroachment into our industry's sector. However, due to the current public health crisis, our members are currently working with their state and local governments to offer additional available modular and relocatable building structures to support hospitals and public officials with patient surge capacity. As such, our capacity to offer substantive comments is limited.

Thank you for your consideration of this request. Finally, we reserve our right to submit additional comments to the docket.

Sincerely,



Tom Hardiman
Executive Director