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Cooper, Kathy

From: Lieffrig, John <John.Lieffrig@modspace.com>
Sent: Wednesday, August 20, 2014 10:49 AM
To: IRRC
Cc: Sheets, James; Lieffrig, John; Wagner, Ron
Subject: Regulation # 3063 – Industrialized Housing Components

2014 AUG 20 AM 11: 05

August 20, 2014

Mark A. Conte, Chief,
Commercial Buildings Division,
Department of Community and Economic Development,
400 North St. 4th Floor,
Harrisburg, Pennsylvania 17120-0225.

Re: Regulation # 3063 – Industrialized Housing Components

Dear Mr. Conte,

As a resident of Pennsylvania and Vice President of Sales for Modular Space Corporation, I must express my concerns regarding the proposed rules about coding for industrialized housing components.

Our corporate headquarters is in Berwyn, PA and largest manufacturing facility is down the road in Elizabethtown, PA. We employ more than 300 people across the Commonwealth in addition to working with several hundred more contractors and vendors. Our company has 3,000 modular buildings valued at nearly \$40 million here that are used to support new construction projects, Marcellus Shale exploration and extraction, public and private education and much, much more.

A single statewide administrative program would be beneficial for Pennsylvania, but there must be provisions for industrialized buildings constructed prior to the adoption of any new regulations. If passed as it is currently written, this regulation would make now code-compliant buildings illegal for use and cause significant hardship for our employees, contractors and the many companies, individuals, industries and projects throughout the state that rely on them.

The passage of these regulations would result in a costly loss and additional expenses that would force ModSpace to consider relocating our entire fleet of modular buildings as well as our business operations to another state.

At a minimum, Section 145.31 needs to be amended as follows:

§ 145.31. Requirement of certification.

- (a) No person may sell, lease or install for use on a site in this Commonwealth newly constructed industrialized housing, buildings or housing or building components unless the industrialized housing, building or housing or building component is certified and bears insignia of certification issued by the Department. The insignia of certification issued by the Department shall be attached to the industrialized housing, building or housing or building component under this chapter, and they shall be subject to subsequent removal in accordance with this chapter. The sale, lease, and installation of industrialized housing, buildings or components constructed prior to the adoption of these regulations are not prohibited shall be permitted subject to approval by the local authority having jurisdiction.

This language is consistent with other state programs, and more importantly would prevent these regulations from being interpreted to apply retroactively to existing code-compliant buildings.

Pennsylvania is home to our employees and our business. I implore you to consider this and amend the regulations as noted above before their impact is felt throughout the state.

Sincerely,



John Lieffrig

Vice President Sales

Modular Space Corporation

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