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Mr. Mark Conte, Chief Housing Standards Division
Department of Community and Economic Development
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225
mconte@state.pa.us

Re: Comments on Draft Final-Form Rulemaking, Annex A, Title 12, Part V, Subpart C, Chapter 145.
Industrial Housing and Components

Dear Mr. Conte,

As Mobile Modular / McGrath RentCorp is a company licensed in PA, and as Director of Engineering and Legislative Affairs, please consider the following comments:

1. The revisions and updates to Chapter 145 are inconsistent with relocatable building / modular building programs in surrounding states.

a. The inconsistencies include apparent limits to the use and relocation of existing units built prior to this program effective dates, as allowed in surrounding states

b. Certification of units to be labeled which were built prior to this program's effective date, as allowed in surrounding states

2. Ability to move labeled units within the State

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a. 145.2 (3) allows the movement of units within the State, but does not address the existing units, legally built and installed prior to this programs effective date.

3. Certification / use of units labeled by valid out of state manufacturer

a. 145.104 Reciprocal Agreements appears to address this topic for new buildings, and needs to be inclusive of existing units presently installed with the State

4. Permanent Foundation requirements

a. Remove prescriptive requirements to allow any foundation system designed by a Professional Engineers, properly licensed in the State of PA.

Your consideration of these comments, vital to those operating in the industry within the State of PA, is appreciated.

Regards,

Daniel G. Arevalo

Director of Engineering and Legislative Affairs
Mobile Modular / McGrath RentCorp

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