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July 26, 2015

Mr. Mark Conte  
Department of Community and Economic Development  
Commonwealth Keystone Building  
400 North Street, 4<sup>th</sup> Floor  
Harrisburg, PA 17120-0225  
[mconte@state.pa.us](mailto:mconte@state.pa.us)

**Re: Comments on the Draft Final-Form Rulemaking, Annex A, Title 21, Part V, Subpart C, Chapter 145, Industrialized Housing and Components**

Dear Mr. Conte,

**NRB(USA), Inc.** is a **Pennsylvania modular building manufacturer** located in Lancaster County. We specialize in permanent off-site construction used for schools, prisons, hospitals, government buildings and many other types of structures. All of our buildings use not only our own labor workforce, but use local Pennsylvania licensed sub-contractors in the Lancaster area as well to construct our product.

In review of the draft as set forth, NRB has concerns with certain portions of the revisions and updates to Chapter 145 as they are inconsistent with modular building programs established in other surrounding states and imposes hardships on modular manufacturers, their Dealers, and ultimately the consumer.

The program addresses only new modular structures or units when there is a dire requirement for the program to accept:

- a) the use of previously manufactured and labeled (by other states) units in the Commonwealth,
- b) the seal (from another state which has a modular compliance programs) by local jurisdictions through an approved PA licensed third party for issuance of a PA label for the relocation of these previously approved and certified units,
- c) a foundation or foundation system in conformance with the UCC buildings codes which can be reviewed, stamped and approved by the licensed PA engineer versus the current language in the regulations which have requirements for a permanent foundation that seems far reaching and costly.

**NRB(USA), Inc. • 191 Quality Circle • New Holland, PA 17557 • Telephone: 717-354-7770 • Fax: 717-354-7774**  
**Website: [www.nrb-inc.com](http://www.nrb-inc.com) • Toll Free: 877-455-2160 • Email: [inquiries@nrb-inc.com](mailto:inquiries@nrb-inc.com)**



As a member of the Modular Building Institute, the National Institute for Building Sciences –Off-Site Construction Council, the Pennsylvania Industrialized Housing/Building Advisory Committee, and the Industrialized Building Commission Rules and Regulations Committee, I request that the dialogue be re-opened to resolve these important and outstanding issues.

Sincerely,  
**NRB (USA), Inc.**

A handwritten signature in black ink, appearing to read "D.F. Engle", is written over a horizontal line.

Donald F. Engle, Jr.  
General Manager

Cc:

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