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July 24, 2015

Pennsylvania Department of Community and Economic Development
400 North Street, 4th floor
Harrisburg, PA 17120-0225

Att: Mark A. Conte, Chief

RE: Advanced Notice of Final Rulemaking, 12 PA CODE Chapter 145, Industrial Housing and Components

Dear Mr. Conte,

As previously communicated in August of 2014, we routinely communicate with state and local code officials regarding modular unit construction and the associated approval processes throughout the countries we transact business in. We operate one of the largest leased fleets of industrialized commercial buildings in the United States today.

We are requesting the final form regulations are withheld, until consideration is given to all final rulemaking comments or the opportunity to meet with the fleet stakeholders specifically regarding commercial (non-residential) structures is considered.

The regulations as written do not address a number of issues related to commercial industrialized buildings/structures in the state today. Unlike residential housing for which these regulations were originally generated, commercial industrialized buildings are relocated often, for leased clients throughout the state. Our maximum average lease term as indicated prior in Pennsylvania today is less than 23 months. The final rulemaking revisions are currently inconsistent on how to address commercial industrial buildings that are relocated.

These units may be a single small mobile office or larger projects relocated to support infrastructure and construction projects throughout the state.

The regulations as written do not address the approval method or ability to relocate commercial industrial buildings in the state following application of the "new" unit approval/insignia for the initial installation location.

Our units are leased, returned to the branch, and re-leased to another client. The entire purpose of the fleet is temporary/non-permanent space for generally 24 months or less.

Additionally, clear direction to the local official on approval for industrial units produced prior to the issuance of this final regulation has not been addressed. The vast majority of commercial lease fleet units are multi-coded with state approvals in place from other program states. (There are approximately 37 industrial/modular building program states in the US today). Reciprocity for existing fleet should be considered and addressed.

As written, the regulation specifically excludes methods used routinely today on leased fleet commercial, non-permanent structures. Excluding these methods will incur substantial increases on installation fees on the leased fleet structures to business owners in the State of Pennsylvania, who routinely lease industrial/commercial buildings.

Requirements for any foundation system should be designed, specified under a state licensed professional engineer, including any method the engineer certifies and deems appropriate for the building installation.

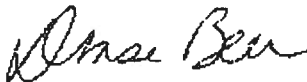
Several states in the vicinity (Virginia, New Jersey) have provisions to provide insignias on existing fleet units as well as re-certify units within their programs. Not only would this approach provide additional revenue to the State of Pennsylvania, it allows a means to provide re-assurances to the local officials through the third party inspection network and insignias provided.

Other state programs, (LA for example) has separate insignias to differentiate between an existing unit approved versus the newly manufactured unit approved.

Williams Scotsman locations currently in the State of Pennsylvania, have operational expense in excess of five million dollars. We annually pay near one million dollars in real property, sales and use taxes.

We would kindly request consideration of our concerns and would appreciate a written response.

Sincerely,



Denise Beer

NA Fleet Manager
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Williams Scotsman, an Algeco Scotsman company is headquartered in historic Fell's Point, with over 200 employees currently employed in the State of Maryland. Williams Scotsman offers space solutions for the construction, education, energy, industrial, commercial/retail, healthcare, and government markets, with operations in the United States, Mexico, and Canada. Williams Scotsman has been solving space needs since 1955 with a fleet of approximately 100,000 units.

Algeco Scotsman is the leading global business services provider focused on modular space and secure portable storage solutions. Operating as Williams Scotsman in North America, Algeco in Continental Europe, Elliott in the United Kingdom, Eurobras in Brazil, Ausco in Australia, and Portacom in New Zealand, the company manages a fleet of more than 340,000 units, with operations in 38 countries including Australia, Austria, Belgium, Brazil, Canada, China, Czech Republic, Finland, France, Germany, Hungary, Italy, Lithuania, Luxembourg, Mexico, Netherlands, New Zealand, Poland, Portugal, Romania, Russia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Ukraine, United Arab Emirates, United Kingdom, and United States.