



July 23, 2026

Home Innovation Research Labs
Attn: John Peavey, Director of Building Science
400 Prince Georges Blvd.
Upper Marlboro, Maryland 20774
mhcc@homeinnovation.com

RE: Notice of Federal Advisory Committee Meeting; Manufactured Housing Consensus Committee (MHCC) Docket No. FR-6549-N-03

Dear MHCC Members:

We, the undersigned manufactured home builders, write to express our strong support for the energy-efficiency standards recommended by the MHCC in 2022 and to urge the Committee to again recommend their adoption by HUD.

Today's manufactured housing industry is already building homes that significantly exceed the energy-efficiency requirements contained in the current HUD Code. The fact that the Code's energy provisions have not been meaningfully updated in decades does not reflect current industry practice and contributes to the inaccurate perception that manufactured housing is built to outdated standards. The reality is that modern manufactured homes are among the most energy-efficient housing options available to American homebuyers.

The MHCC's 2022 recommendations provide a practical, cost-effective, and carefully vetted path to modernizing the HUD Code. Developed through the consensus process established by Congress, the recommendations improve energy performance while preserving affordability and consumer choice. They reflect years of technical review and remain the most appropriate framework for updating the federal standards.

Most manufacturers already construct homes that meet or exceed the performance levels reflected in the 2022 recommendations. HUD should move forward with modernizing the Code so that the written standards align with the homes being built today.

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We respectfully urge the MHCC to reaffirm its 2022 recommendations and transmit them to HUD with a recommendation that they be adopted as the updated energy-efficiency standards for manufactured housing.

Sincerely,

Adventure Homes

Cavco Industries

Champion Homes

Clayton Homes

Deer Valley Homebuilders

Jessup Housing

Kabco Builders, Inc.

Live Oak Homes

Timber Creek Housing