

MOBILE-COMPONENT HOUSING AND SOLAR ENERGY: THE POSSIBILITIES

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ABSTRACT

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Mobile-Component Housing and Solar Energy: The Possibilities

This paper is part of a body of work directed at enhancing the acceptance of photovoltaics in various sectors of the U.S. economy. The focus here is on residential applications. The work is funded by the U.S. Department of Energy as part of its photovoltaics program. Earlier work has considered the nature of institutional forces in the housing sector generally, including a study of several housing developments incorporating solar thermal technologies with the assistance of the HUD-DOE Solar Heating and Cooling Demonstration Program. This earlier work resulted in a series of papers summarizing the application of institutional analysis methods to housing, including a research design (Nutt-Powell, 1979), and preliminary sector explorations covering housing production (Swetky and Nutt-Powell, 1979), governmental involvement in housing (McDaniel and Nutt-Powell, 1979), research and socialization in housing (Furlong and Nutt-Powell, 1979), energy provision in housing (Reamer, Heim and Nutt-Powell, 1979), and standards in housing (Parker and Nutt-Powell, 1979). The housing development case studies are reported in three papers (Nutt-Powell et al., 1979; Nutt-Powell, 1979b; Parker, 1980.) Additionally a separate analysis was undertaken of the HUD-DOE program, focused on implications for program design of PV acceptance in the housing sector (Nutt-Powell, 1980). This analytic work has paralleled and contributed to development of specific approaches to residential acceptance, including a Residential Application Implementation Plan (MIT EL/LL, 1979).

The various studies and plans completed to date have taken a very broad view of the housing sector. As the technology develops, coming closer to cost and production feasibility on a large scale, it is appropriate to begin more detailed analyses of the housing sector. Among such detailed analyses are those considering the possibilities for acceptance of PV among different modes of housing construction. This paper is one such analysis. The focus is on that form of housing production defined as "mobile-component housing," a type of housing built in a factory to a single national construction standard administered by the U.S. Department of Housing and Urban Development.

There are four sections in this paper. The first section describes the structure of the manufactured housing industry. It provides definitions and terminology necessary to a discussion of mobile-component housing.

It then reviews the production activity and approach, distribution, consumer and financing for this mode of housing. The second section presents the product characteristics of mobile-component housing. The third section reviews solar technologies, and discusses their relation to mobile-component housing. The fourth section focuses specifically on factors influencing receptivity to solar by the mobile-component housing industry. The conclusion to this paper summarizes the analysis as it relates to the possibilities for photovoltaics in mobile-component housing. Acknowledgements

We are appreciative of the assistance of several individuals in providing information useful to our studies of M-C housing and solar technology. In particular we would like to mention Howard Snider, President of the Western Manufactured Housing Institute, who has been most gracious in facilitating access to the industry. A group of marketing and produce development executives provided useful insights to factors influencing solar acceptance, including Chuck Smedley of Guerdon Industries; Gary Pomeroy of Golden West Homes; Bob Barnes of Pacific Living Systems; Jon Nord and Don Wichman of Fleetwood Enterprises. Jon Rosenbaum of Fleetwood was helpful in providing pertinent marketing data.

CONTENTS

Abstract	i
Acknowledgements	ii
Contents	iii
Introduction	1
The Structure of the Manufactured Housing Industry Definitions and Terminology Production Activity Production Approach Distribution Consumer Financing	1 3 7 9 11 19
Product Characteristics Structural Properties Factory Assembly Product Role	25 25 27 28
Solar Energy Technologies Definitions Solar Technologies and Building Design Solar Technology and M-C Housing	30 30 30 32
Factors Influencing Receptivity to Solar by the M-C Housing Industry	37
Conclusion	40
References	47
Tables 1. M-C Housing Shipments and Sales, 1950-1978	5
 Comparison of M-C House Shipments and Sales of Single Family Site-Built Houses 1975-1978 Comparison of Single and Multiple Component M-C House 	6
Shipments, 1972-1978	6
4. Mobile Home Households, 1976	13
J. Aye of Head of Household by Household Size M.C. House Comment	15
7. Total Annual Family Income, by Household Size and Age of	Τρ
Head of Household, M-C House Owners	17
8. Placement of M-C House, by Household Size, Age of Head of	
Household and Total Annual Income, M-C House Owners	18

1

•

9.	Cost and Size of M-C House, 1973-1979	21
10.	Value of Mobile Home Retail Paper Outstanding and Number of Accounts of Reporting Institutions	23
11.	FHA and VA Financing of M-C Housing	24
Fig	ures	
1.	Floor plan examples of 1-4 component M-C houses	4
2.	Architectural renderings of contemporary M-C houses	26
App	endices	
Α.	Summary of Shipments to States, 1978	49
в.	Comparison of Design Criteria for Single Family Dwellings,	
	Federal Mobile Home Standard and Uniform Building Code	51

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THE STRUCTURE OF THE MANUFACTURED HOUSING INDUSTRY

Definitions and Terminology

Manufactured housing is a generic term meaning housing produced in a factory. It is distinguished from regular site-built housing, which is constructed mostly at the building site. The distinction is not rigid, however. While there is a certain amount of site work needed on most maunfactured housing, certain parts of site-built housing (roof trusses or preassembled/prehung windows and doors, for example) may be manufactured.

There are two broad distinctions in manufactured housing, which define two housing types. The first housing type is built to state-adopted building codes, which, in turn, are generally modelled on national or regional model codes such as the Uniform Building Code (UBC). The second housing type is built to a single national standard, embodied in the Federal Mobile Home Construction and Safety Standards administered by the U.S. Department of Housing and Urban Development. This latter is known as the HUD Code.

The National Association of Home Manufacturers has nine product classifications for manufactured homes which apply to housing built to state codes:

i Pre-cut and/or shell homes

ii Components

iii Panelized homes

iv Mechanical or utility cores

- v Modular or sectional homes
- vi Log homes
- vii Geodesic dome homes
- viii Multi-family homes
 - ix Commercial structures

These classifications are based on differences in the extent of completion at the factory, on construction style, and on use of the manufactured structure.

Manufactured housing built to the HUD code is often referred to, albeit inaccurately, as "mobile homes," as a result of its evolution from travel trailers, through truly <u>mobile</u> homes, to include an entirely new product. In this paper the term "mobile-component housing" (M-C housing) will be used to refer to housing built to the HUD code. The term M-C housing reflects two basic characteristics of this form of housing. First, it involves three-dimensional components which are themselves mobile. Second, it becomes housing when the components are joined together at the site of occupancy and connected to appropriate services and utilities. Single-component M-C housing is structurally complete on leaving the factory. (Figure 1 shows an example of M-C housing of from one to four components.)

An essential part of any mobile-component is a sub-component which serves both as a chassis for transporting it <u>and</u> as an integral structural element. Thus, the components are mobile <u>per se</u>; they do not require additional transportation capability. However, after the initial move from factory to site the M-C house is, in most cases, no longer mobile.²

The components of M-C houses tend to be built to widths which conform to maximum permissible highway loads. Most states permit fourteen foot widths on their highways, some permit sixteen. California, however, allows only twelve foot modules, while Nevada allows twenty-eight. This width control had led to the industry terminology, "single-wides" and "double- (or multi) wides." A parallel usage is "single-section" and "multi-section." Figure 1 shows various combinations, including a twocomponent M-C house in which the second component is a small expansion of the living room.³

Production Activity

During the 1970s the number of M-C houses built has varied between 200,000 and 600,000 units per year, the divergence reflective of economic conditions in any given year. Table 1 summarizes manufacturer shipments during the time period 1950 through 1978, with estimates of the aggregate sales volume for each year. Nineteen-seventy-eight sales are estimated at nearly \$4.5 billion. M-C homes have constituted about one-quarter of the new single-family dwelling market for the past several years. Table 2 provides a comparison for 1975-78. The relative proportion of single to multiple component M-C houses has steadily shifted toward the larger, multiple component unit. Table 3 provides a comparison of proportion of total shipments from 1972-1978. In 1972 about one-sixth of shipments were multiple component M-C homes, while in 1978 such homes constituted one-third of shipments. Shipment activity varied by state. Data for 1978 shipments is found in Appendix A.

K/0 L B. B c. doublewide d. double. Hide -expandable e. type. wide f. quadruple. Wide FIGLRE 1. TYPICAL FLOOR PLANS

b. single wide -expandable

a. single.wide



Table 1 M-C Housing Shipments and Sales 1950-1978

	Manufacturers'	
	Shipments to	Retail Sales
Year	Retailers in U.S.	(ESTIMATED)
1978	274,901	\$4,378,000,000
1977	265,145	3,765,000,000
1976	246,120	3,136,616,000
1975	212,690	2,432,661,000
1974	329,300	3,213,681,000
1973	566,920	4,406,382,000
1972	575,940	4,002,783,000
1971	496,570	3,297,225,000
1970	401,190	2,451,271,000
1969	412,690	2,496,775,000
1968	317,950	1,907,700,000
1967	240,360	1,370,052,000
1966	217,300	1,238,610,000
1965	216,470	1,212,232,000
1964	191,320	1,071,392,000
1963	150,840	862,064,000
1962	118,000	661,000,000
1961	90,200	505,000,000
1960	103,700	518,000,000
1959	120,500	602,000,000
1958	102,000	510,000,000
1957	119,300	596,000,000
1956	124,330	622,000,000
1955	111,900	462,000,000
1954	76,000	325,000,000
1953	76,900	322,000,000
1952	83,000	320,000,000
1951	67,300	248,000,000
1950	63,100	216,000,000

Prior to 1950, production varied from 1,300 in 1930 upward to 46,200 in 1949.

SOURCE: MHI, 1979.

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Table 2 Compariso Single	n of M-C House : Family Site-Bui	Shipments lt Houses	and Sales 1975-1978	of
	All Prices			
Site-Built Houses Houses Sold Percent of total Site-Built Houses sold M-C Houses Shipped	1975 550,000 72%	1976 647,000 72%	1977 820,000 76%	1978 817,000 75%
M-C Houses Houses Shipped Percent of Total Site-Built Houses Sold & M-C Houses Shipped	212,690 28%	246,120 28%	265,145 24%	274,901 25%
Total New One-Family Site-Built Houses Sold & M-C Houses Shipped	762 , 690	893,120	1,085,145	1,091,901
SOURCE: MHI, 1979				
Table 3 Compariso M-C H	on of Single and House Shipments	 Multiple 1972-197	Component 8	
Single Component 85.28 Multiple Component 14.88	2 1973 1974 8 81.6% 77.5% 8 18.4% 22.5%	1975 74.1% 7 25.9% 2	1976 197 2.8% 70.0 7.2% 30.0	7 1978 % 69.0% % 31.0%

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SOURCE: MHI, 1979

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Production Approach

Analysis of the residential building industry is typically restricted to site-built housing. Such analyses consider the requisite skills of the labor pool, the seasonality of construction activities, the variability of applicable regulations, the multiplicity of entrepreneurs, and the disaggregation of the market. It is useful to compare site-built and mobile-component housing in relation to each of these factors. Skills: Site-built housing involves skilled labor, especially to the extent that the house is custom built. Moreover, if a given builder is producing any volume of units annually, many tasks will be sub-contracted to a specialty trade (plumber, electrician, roofer, and so on). Though M-C housing involves similar building processes, the regularity with which these processes occur permits training of crews to repeat only certain tasks, and to repeat them under factory-supervised conditions. Thus any given worker need not be skilled in a trade. The differences in skill requirements is reflected both in the trade unionization of those working on site-built housing versus the industrial unionization of employees in the M-C housing industry, and in the fact that labor input in a sitebuilt home runs to 55% of the total production cost, while for M-C housing it is only 11%. (Realtors Review, May 1978, p. 9).

<u>Seasonality</u>: Site-built housing tends to proceed in seasonal spurts, more being produced in the warmer seasons than in winter. By comparison M-C housing can proceed irrespective of weather conditions because construction occurs inside. Thus, those fluctuations in production which do occur are more a function of normal business cycles.

Regulations: The 1974 legislation which led to the June 15, 1976 implementation of the HUD Code means that M-C housing construction is subject to a single standard. This contrasts sharply with the situation applying to site-built housing, which must meet a different code in each state, and must deal with differing interpretations of codes by building inspectors at different jurisdictional levels. The regularity of application of the HUD Code is ensured by a process which first involves approval of the design and specifications for a new M-C housing model, and then has in-plant inspectors at each factory monitoring construction. In-plant inspection permits immediate review on completion of a construction stage. While the site-built home also has prior approval of home plans, it is given separately for each home, with only periodic inspection of the site, scheduled to approximate estimated completion of activities. Entrepreneurs: Housing, especially single-family housing, is cited as an economic activity which provides for ease of entry for the entrepreneur. The National Association of Home Builders estimates that there are 127,000

The National Association of Home Builders estimates that there are 127,000 builders, with 40 percent of them building 10 or fewer units per year. By comparison, there are only about 190 firms producing M-C housing from about 450 factory sites (MHI, <u>Quick Facts</u>, p. 3). Production of M-C housing is a much more corporate activity, with the major firms in the industry trading their stock publicly. Several of the largest firms are listed among <u>Fortune</u>'s 500. While the corporate dimension of M-C housing limits ease of entry, it does provide for more secure financing, internal planning, research and development, and the ability to benefit from economies of scale.

Market disaggregation: Perhaps the single most significant aspect of the building industry is its fragmentation, a consequence of the highly disaggregated nature of the market. Consumer preferences are said to vary highly among localities, requiring a close connection of producer and consumer. This then leads to undercapitalization, discontinuities of production team activity, limited capability for research and development (or even for learning from experience) and general inefficiencies. All of these limitations are passed on to the consumer in housing price. By comparison M-C housing depends on market aggregation. Plant efficiencies demand production of at least four components daily (1,000 annually). Routines of production necessitate similarities in design and materials. Given an economically optimum transportation distance of no more than 350 miles, M-C housing manufacturers can build for regional and sub-regional markets, and respond to consumer preferences by providing for variations in basic floor plans, addition of optional elements (for example, fireplace, central air conditioning), and choice among a limited array of furnishing materials (carpeting, for example).

Distribution

M-C housing reaches its market through a network of dealers. The units are located in a variety of settings, with different land tenure arrangements. This section briefly reviews the dealer system, and the various land/unit relationships.

Dealers: Most M-C housing is purchased from retail dealers, of which there are approximately 12,000 in the U.S. The system is quite similar

to that which serves the automobile industry. The vast majority of dealers operate from a single outlet, typically having franchise arrangements with several manufacturers. A dealer will have a range of display homes, though most sales are orders to the manufacturers resulting from particular consumer specifications. Outlets are located in commercial zones, and often have conspicuous site advertising. Dealers will arrange financing with financing institutions. They will also arrange unit setup. Many maintain service departments, and also stock parts and materials. Service requirements are the result of the inclusion of M-C housing sales under various product warranty statutes, partly because the interstate sales nature of this housing form permits federal government intervention. In addition to active monitoring by the Federal Trade Commission, HUD's standards program provides a complaint system through its network of State Administrative Agencies.

<u>Parks:</u> The best known form of land tenure for M-C housing is the "mobile home park." The prevailing, essentially negative, park image is a vestige of the trailer tradition of the industry, and is supported by the frequent location of parks adjacent to sales outlets in "commercial" rather than residential sections of towns. Though there are parks which fit this negative image (small lots, high densities, narrow streets, limited parking and so on), the contemporary park is usually well designed and maintained, and provides a variety of services. Most parks rent lots to persons owning their own M-C home, though some do rent units as well. Conditions of tenure vary, as do lot rentals. Some parks cater to specific clientele, the most frequent example being the elderly.

<u>Individually-owned sites</u>: According to data from the 1976 Annual Housing Survey 51% of M-C houses were located on a site owned by the unit owner. The opportunities for individual siting in residential zones are often limited by local zoning regulations. Many jurisdictions prohibit M-C housing altogether in residential zones, limiting it to zoned park areas. Others exclude M-C housing altogether.

<u>M-C housing developments</u>: Despite zoning restrictions, the most rapidly growing type of location of M-C housing is the M-C housing development. Essentially this is no different from any other large-scale housing development effort (subdivision, Planned Unit Development, horizontal condominium and so on) except for the exclusive use of mobile components. A developer (often a dealer, sometimes in a joint venture relationship with a manufacturer) will develop and sell the house and lot together. In most respects this locational type, as with the individually-owned site, is indistinguishable from the conventional single family dwelling. The houses are usually built on foundations (sometimes with crawl-spaces or basements) and on regular sized lots.

Consumer

The data from which a useful consumer profile could be derived are severely limited in terms of availability, uniformity of definition, and gaps in time. This section briefly reviews such as are available.

Given the rapid changes in the nature of the M-C housing industry, Census data are of very limited use. The 1970 Census counts those who live in "mobile homes and trailers" (MH/Ts). These are defined purely in terms of the perception of the interviewer, or of the respondent.

If the MH/T is of the modular-component variety, and is perceived as a permanent home, it may not be recorded as a "mobile home or trailer." Insofar as this definition limits the validity of the data it gives no clear indication of the true size, or demographic characteristics of the occupancy of M-C housing. The 1980 definition will continue this confusion, even when these data are available.

The Annual Housing Survey, also conducted by the Bureau of the Census, presumably would provide more current data. Unfortunately, its definition of MH/T is based on the same methods as are used for the decennial census Consequently AHS data have limitations similar to Census data. The most recent AHS data available are for 1976. Table 4 provides a brief summary. Of the 3.6 million occupied MHs, about one-third were in urban areas. The most pertinent demographic comparison is the median income of owned and rented MH/Ts compared with the tenure status of all households. The median income for owner-occupied MH/Ts was \$10,000, compared with \$14,400 for all owner-occupied households. For renter-occupied households the comparison is \$6,900 for MH and \$8,100 for all renter-occupied households. Data of this type suggest that the average MH/T occupant belongs to a lower income group than the average site-built home occupant, contributed to by the large proportion of retirees and young couples, as well as by the inclusion of trailers and the absence of some of the "best" M-C houses from the AHS.

A detailed consumer profile was compiled for Fleetwood Industries, based on survey responses by purchasers in the 2nd through 4th quarters of 1978. Because Fleetwood is a large manufacturer selling a full range of M-C housing nationally, the profile has some presumptive validity.

Mobile Home Households: 1976

Location Urban	
Siting Group of 6 or more (Rental Park or Subdivision)	
(Rental Park or Subdivision)	
Individual	
Home Ownership Home Owned	
Home Rented	
Home Acquired (Owned Homes)	
Resale	
Land Ownership	
Site Cwned	
Income of Owner Renter	
Nousenora neaus Occupied Occupied	
Less than \$5,000	

Source: AHS, 1976.

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A very rough comparison is possible between certain of the categories for the AHS and Fleetwood data. Two categories -- income and age of head of household -- stand out. The more recent data, Fleetwood's, would suggest that there is an increase in ownership among the middleage cohorts (Table 5). In Fleetwood's data both under 25 and 25-34 proportions are smaller compared to AHS figures for 1976. Moreover, an analysis of age of head of household by household size shows that nearly one-quarter of all households of three or more persons (that is, families with children) are headed by persons 35-44, though heads of household of this age constitute only 13% of the sample. Nearly two-thirds of all households of three or more are headed by persons age 25-44, though this group is less than one-half of the sample (Table 6). The Fleetwood data also show a much higher income profile (Table 7). The median income of \$15,170 is much higher than that of the AHS, even allowing an increase for inflation and assuming definitional comparability. Only one-fifth of the sample had an income less than \$10,000, while one-quarter of the sample had an income of \$20,000 or more. About one-eighth of the sample had an income of \$25,000 or more. Thus, it would appear that the income profile of the average M-C home consumer is shifting upwards. The locational trend toward private siting is also led by families. Two-thirds of households of three or more live in private sites or M-C home developments, while nearly two-thirds of households of 2 or less live in "mobile home parks" (Table 8).

Age of Head of Household M-C House Owners AHS & Fleetwood

Fleetwood

	90
under 25	14.4
25-34	23.6
35-44	13.1
45-54	15.7
55-61	13.0
62 and over	20.1

AHS

(owner occupied, 2 or more person households male head, wife present, no non-relatives)

under 25	* 15.9
25-34	28.4
35-44	13.3
45-64	26.2
65 and over	16.2

Sources: Fleetwood, 1978 AHS, 1976 .

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Age of Head of Household by Household Size M-C House Owners

	Å11	Househo	ld Size	
	Respondents	Two or Less	Three or More	
Sample Size	1869	1053	772	
Under 25 Years	14.4%	15.1%	13.6%	
25 to 34	23.6	12.2	39.3	
35 to 44	13.1	6.6	22.1	
45 to 54	15.7	14.3	17.0	
55 to 61	13.0	18.9	4.8	
62 and over	20.1	33.0	3.1	
No Answers	32	19	7	
Median	43.15	54.68	33.33	

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Note: Percentages are based only on those responding.

Source: Fleetwood, 1978

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Total Annual Family Income, by Household Size and Age of Head of Household, M-C House Owners

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		Household Size		Age of	Age of Head of Household		
	All Respon- dents	Two or less	Three or more	Under 35 yrs.	35 to 54 yrs old	55 yrs or over	
Sample Size	1869	1053	772	699	529	609	
Under \$8,000	11.3%	17.0%	4.0%	4.3%	4.7%	26.2%	
\$ 8,000 to \$ 9,999	8.5	10.8	5.6	7.6	5.8	12.2	
\$10,000 to \$11,999	11.2	12.8	9.0	13.9	7.2	11.4	
\$12,000 to \$13,999	11.7	10.8	12.8	15.8	• 9.9	8.0	
\$14,000 to \$15,999	12.6	9.8	16.0	15.0	14.0	3.2	
\$16,000 to \$17,999	9.3	7.8	11.4	10.8	10.5	6.2	
\$18,000 to \$19,999	9.1	7.0	12.0	12.1	9.5	5.0	
\$20,000 to \$24,999	13.2	12.0	15.0	13.2	17.7	8.8	
\$25,000 and over	13.2	11.8	14.4	7.3	20.6	14.0	
No Answers	230	148	70	53	44	109	
Median	\$14,170	\$13,724	\$16,475	\$15,113	\$17,588	\$12,050	

Note: Percentages are based only on those responding.

Source: Fleetwood, 1978

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Placement of M-C House by Household Size, Age of Head of Household and Total Annual Income

		Hou	sehold Size	e Age o	of Head of H	ousehold	Total An	nual Income	2
	All Respon- dents	Two or less	Three or more	Under 35 yrs.	35 to 54 yrs old	55 yrs or over	Less than \$12,000	\$12,000/ \$19,999	\$20,000 or more
Sample Size	1869	1053	772	699	529	609	508	698	433
Mobile Home Park	50.2%	58.9%	38.8%	48.1%	43.1%	59.2%	62.6%	46.1%	44.1%
Private Property	43.9	35.1	55.8	48.3	50.2	32.7	33.0	49.1	45.5
Mobile Home Subdiv.	5.9	6.0	5.4	3.6	6.7	8.1	4.4	4.8	10.4
No Answers	36	22	10	9	7	16	8	6	9

Note: Percentages are based only on those responding.

Source: Fleetwood, 1978

Financing

Financing, and financial institutions, have impacts on M-C housing at two levels. First, the financial community deals with the large manufacturers of the relatively consolidated M-C housing industry quite differently from the way it deals with the numerous small producers in the highly fragmented site-built housing industry. On the other hand, while the M-C producer is relatively well treated in the financial marketplace, the M-C home consumer is not quite so well off, although this situation is changing.

<u>Manufacturers</u>: While the M-C housing industry, like the rest of the housing industry, can be subject to large fluctuations in production, reflecting changes in the economy, it is, by virtue of its industrial structure, capable of avoiding the worst of the effects of external forces. It is certainly able to avoid many of the seasonal impacts suffered by site-built housing producers. Moreover, even the effects of broad shifts in the economy can be cushioned somewhat by the ability of the industry to shift its production mode quickly, with almost no effect on the plant as an institution. It is also able to make long-term corporate financial plans, hence anticipating and smoothing the effects of shifting circumstances in the financial market. The ability to change product line quickly in response to market demand means that there is relatively little inventory-swallowing capital. This permits capital investment in production facilities, which is vastly more appealing to the financial community.

<u>Consumers</u>: Historically M-C housing has been financed as personal rather than as real property. Perceptions of mobility, lower-income occupancy, and absence of durability (exacerbated by the historical annual introduction of "new and better" models) all contributed to a financial pattern based on the assumption that this form of housing was "consumed" (hence, depreciated rapidly) rather than maintained (hence, appreciated).⁵ The continuing impermanence of land tenure arrangements, exemplified by the "mobile home park" system, reinforces these negative perceptions and, therefore, this financing system, despite current evidence of technical durability and practical immobility.

However, the increase in numbers of M-C homes located on self-owned sites and in M-C housing developments has been accompanied by the beginnings of a shift in financing practices. The increase in average price, and the increased frequency of combined financing of unit and land have made the M-C home investment attractive in dollar volume and durability. Table 9 presents cost and size data on M-C homes for the period 1973 to 1979. Both average square footage and total cost have increased during this time period.

By the end of 1979, the total value of M-C housing retail paper outstanding was just over \$17.4 billion. Based on Federal Reserve Board reports, the distribution of this paper by lending institution type is as follows:

- * Commercial banks 57%
- * Finance companies 19.4%
- * Savings and Loan Associations 20.3%
- * Federal credit unions 2.9%.

The Manufactured Housing Institute does an annual sample survey of financial

Cost and Size of M-C Houses 1973-1979

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	1973	1974	1975	1976	1977	1978	1979
Average Sale Price (All Lengths & Widths)	\$ 7 , 770*	\$ 9,760*	\$11,440*	\$12,750*	\$14,200*	\$15,925*	\$17,700
Cost Per Square Foot	\$8.84*	\$10.63*	\$11.98*	\$13.09*	\$14.20*	\$15.77	\$16,80
Average Square Footage	882 sq.ft.	910 sq.ft.	952 sq.ft.	966 sq.ft.	1,000 sq.ft	.1,010sq.ft.	1,050 sq.ft.

*Includes furniture, draperies, carpeting and appliances but excludes land as well as costs of steps, skirting, anchoring, and any other applicable set-up charges (approximately 15% of home cost)

Source: MHI, 1979.

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institutions, to assess financing trends. Table 10 summarizes the results of the most recent survey, and presents data on the previous four years. S&Ls are showing the most rapid increase in financing, with a 33% increase in 1979 over 1978. The trend analysis also shows a large increase in average account value over the five-year period.

One reason for the increase in S&L activity in M-C housing was a liberalization, in 1979, by the Federal Home Loan Bank Board of the terms and conditions of lending by these institutions. Similar improved conditions for loan guarantee programs by the FHA and VA have increased use of these programs. (Current terms are found in Table 11.) Increases in interest rates, loan maturities, guarantee amount, and related costs have made these programs more attractive to the financial community. Moreover, FHA and VA insured loans can be pooled by lenders and sold on the secondary mortgage market.

In addition to improved financial conditions for puchase of M-C housing, the federal government has improved its rental subsidy programs, notably by providing for use of Section 8 subsidy funds for lot rental. Some states provide for financing of rental housing using this housing type through their housing finance agencies, while others provide ownership or renter subsidy programs on a state-funded basis.

Nevertheless, in comparison to site-built housing, the cost, conditions, and means of acquiring financing for M-C housing remain less attractive (in most cases).

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VALUE OF MOBILE HOME RETAIL PAPER OUTSTANDING AND NUMBER OF ACCOUNTS OF REPORTING INSTITUTIONS

Total of All Institutions	<u>s: 1979</u>	1978	1977	1976	1975
Reporting Institutions Dollar Value Average Account Value Accounts Outstanding	389 10,085,252,000 13,905 725,294	406 8,230,671,000 12,373 665,195	425 6,613,352,000 9,975 662,948	449 6,319,908,000 9,518 664,068	419 5,368,556,760 7,769 690,595
Accounts Outstanding Fina	anced by Banks,	Finance Companies, a	nd Savings and Loan	Associations	
BANKS	<u>1979</u>	<u>1978</u>	<u>1977</u>	<u>1976</u>	1975
Reporting Institutions Dollar Value Average Account Value Accounts Outstanding FINANCE COMPANIES	285 3,683,167,000 12,748 288,920	309 3,316,223,000 11,978 276,851	307 2,045,515,000 10,279 199,431	315 2,258,628,000 8,963 251,861	321 2,297,150,000 7,949 288,685
Reporting Institutions Dollar Value Average Account Value Accounts Outstanding	28 5,185,802,000 14,561 356,139	22 3,893,833,000 12,329 315,817	29 .3,474,297,000 9,143 379,971	40 3,254,333,000 9,245 351,545	34 2,624,485,000 7,190 364,801
*SAVINGS AND LOAN ASSOCIA	TIONS				
Reporting Institutions Dollar Value Average Account Value Accounts Outstanding	76 1,216,283,000 15,159 80,235	75 1,020,615,000 14,072 72,527	89 1,093,540,000 13,018 83,546	94 806,947,000 13,229 60,662	64 446,921,000 12,079 37,109

Number of Loans Made in 1979 by Banks, Finance Companies, and Savings and Loan Associations

	Total	<u>%</u>	Banks	<u>%</u>	Finance Companies	<u>%</u>	Savings & Loan Associations	<u>%</u>
Reporting Institutions	337		245		22		70	
Total Loans Made in 1979	151,256	100.0	53,392	100.0	80,689	100.0	17 175	100 0
Total Direct Loans	23,972	15.8	19,345	36.2	429	0.5	4 198	26.6
Total Indirect Loans	127,287	84.2	34,050	63.8	80,260	99.5	12,977	75.6

*Savings and Loan Associations are relative new-comers to mobile home financing. This is the most probable reason for the high average account value. SOURCE: MHI, 1980

FHA & VA FINANCING OF M-C HOUSING

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Ne	w M-C Homes	VA	FHA
0	Single-C Term	No maximum	\$18,000
		20 Years	20 Years
~	Multi-C Torm	No maximum	\$27,000
0	Mulci-C leim		327,000
		20 lears	20 lears
0	Maximum Guarantee	\$17.500 or 50% of	
-		loan amount	
		whichever is less	
0	Rate Ceilings	16 1/2% simple	16 1/2% simple
	2		, <u>-</u>
0	Down Payment	None required	5% of first \$3,000
			10% over \$3,000
M-0	C Home Plus		
Im	proved Land		
~	Single-C Term	\$20,000	\$23 500
0	Single-C leim	15 Yoorg	\$23,500
		15 lears	IJ IEALS
~	Multi-C Term	\$27 , 500	\$31,500
0	Marci-C leim	20 Years	20 Years
0	Rate Ceilings	15 1/2% on package	11 1/2%
~	Doum Doumont	None mained	En of first \$10,000
0	Down Payment	None requirea	5% of first \$10,000
			TOS Over \$10,000

PRODUCT CHARACTERISTICS

The contemporary M-C house is, to all intents and purposes, visually indistinguishable from conventional single family detached housing (see Figure 2). Though this is the only market for which M-C housing is currently built, there is no intrinsic reason why it cannot be used in a variety of structural configurations. Indeed, a recently published major work focused on this possibility (Bernhardt, 1980).

Structural Properties

While the completed M-C house may appear to be indistinguishable from a site-built house of the same design, its structural system is radically different. Each mobile-component is not only designed to support the same loads as (or heavier loads than) the regular house, it must also be capable of resisting the constantly changing shear forces which it suffers in its moves from factory to site. It is, in effect, "with its large crosssectional dimensions, (a) box beam design especially resistant both to twisting or lateral buckling (in transport) and to wind or roof forces... at the owner's site" (Bernhardt, 1980, p. 98). In the case of the mobilecomponent the skin doubles as an enclosure and a load distributing element, unlike the site-built house in which load is carried by its frame. A comparison of the HUD code with those applied to site-built housing reveals similarities in specific standards (See Appendix B).

Thus, the perception that mobile components are of inferior construction is false, whatever its history and the reasons for its persistence. To some extent these perceptions may result from the use of certain materials, which, while contributing to the structural quality of the stressed skin, are unlike those used in a regular house. The M-C house is therefore



FIG. 2 MOBILE-COMPATIENT HAGANGI

perceived as structurally inferior (instead of structurally superior) not because of any knowledge about its structure, but because it does not look like a regular house or because, even if it does, it is <u>known</u> to be an M-C house. The perception derives from the emotionally laden assumption that difference implies inferiority.

Factory Assembly

Mass produced housing is not new; witness tract housing. The difference between tract mass production and M-C housing production is that materials, equipment and workers are brought together at the tract site rather than at a factory. In essence it is the "factory" which moves. In the case of M-C housing the product moves. It travels along a production line and work is performed by specialized teams of workers sequentially. Only on completion is the mobile-component brought to the site.

Many of the advantages of factory assembly, which are so well-known in the automobile industry, have been applied in the M-C housing industry. However, the factory system as an institution is quite different in this industry because of the use of work teams, and the dispersed locations of factories. The economic limitation on how far a completed mobile-component can be moved for siting precludes the centralized location of the industry in one or a few sites, $\underline{\lambda}$ <u>la</u> Detroit. On the average, each module is transported about 350 miles, with the result that many relatively small factories are needed. Thus, in M-C housing the routinization of the separate tasks rarely, if ever, descends below the "work team" concept. Groups of men and women work on producing a side or end wall unit, install a bathroom or kitchen, and so on. One worker does not spend a working day connecting, for example, faucets to sinks. Thus the M-C producer, compared

. 27

to the site-built producer, enjoys many of the benefits of industrial production while avoiding many of the problems, such as worker boredom.

Unionization of the M-C housing industry is limited. Where it does occur, it is primarily along industrial lines, thus permitting workers to be classified as assemblers rather than craftsmen (Bernhardt, 1980). In addition to the lower average wage level for industrial <u>vs</u>. craft workers the assembler work teams can be shifted among tasks without regard for possible jurisdictional disputes or cost impact.

Product Role

For decades there have been "schools" of architecture which have sought to develop a viable system of industrialized housing. In most cases they restricted themselves to the two-dimensional component so as to lessen the constraint on form which a three-dimensional module was felt to inflict. Moshe Safdie, in his early design for Habitat '67, introduced a module in three dimensions which fit a separate structural frame. This idea was abandoned, however, for a module with inherent structural properties, effectively destroying the concept of industrialized standardization, because each module had to bear different loads.

While designers sought, in vain, to develop a workable industrial housing system, the M-C housing industry, almost unintentionally, evolved one successfully. Its system is based on "vernacular" (or anonymous) design, rather than on "grand" (or architectural) design. This is, in fact, the source of most marketable design - for the pragmatism of the vernacular is so strong that in the marketplace it filters out much of the conceptualism of grand design.

This pragmatism, insofar as it applies to the M-C housing industry, together with the structural properties of the industry's product and its means of production, suggests that there is a growing role for M-C housing. The present favorable cost comparison, coupled with the industry's capability to respond to market preferences in design, suggests that there are real potentials here.

SOLAR ENERGY TECHNOLOGIES

Definitions

"Solar" architecture is an attempt at minimizing dependence on external energy sources, other than sunlight, for the maintenance of human comfort in buildings. A solar building is defined as "passive" when the methods of energy collection, storage, and distribution are totally independent of mechanical systems. "Active" solar energy, on the other hand, relies on mechanical systems to bridge the gaps between collection, storage and consumption. A system is <u>hybrid</u> when <u>one</u> of these two gaps is bridged mechanically. A more "active" hybrid system links collection and storage mechanically; it is more "passive" when the mechanical link is between storage and the locations of energy consumption.

Solar Technologies and Building Design

While "passive" solar design is unquestionably a more architectural approach, the facility with technical knowledge on the part of the architect which is required for the integration of collection, storage and distribution into the fabric of the building is considerable. The extent of the technical facility required for solar design is clear when one compares it with the architect's normal design routine in relation to heating and cooling. In essence prevailing practice cedes responsibility to a mechanical engineer, who fits an HVAC system to a "picture" of the structure, thus establishing certain structural constraints on the final design. By comparison, "passive" solar design is absolutely integrated into architectural design. It cannot be handed over to an expert external to the design process. Unless an architect acquires the requisite technical facility, s/he cannot do "passive" solar design, as "passive" solar design entails

much more than the application of a few rules of thumb to a "regular" design. It is for this reason that many architects have found it easier to "go solar" with "active" systems.

If the building is small, and the architect is designing the "active" system the result will be a building with a mechanical system similar to the one it replaces or supplements, with (for example) pipes and pumps used in the same way. The major difference is the impact on building form of the flat plate collector, which is not a difficult design constraint, as powerful as its impact may be. If the building is large, the "active" solar system will be designed by an engineer. Within the constraints of this routinized setting, the architectural impact of the flat plate collector is basically similar to other technological impacts (elevator housing, cooling vents, and so on). The architect designs around an "add on" technology, the understanding of which can be left to the technical expert. The innovation of "active" solar energy is, thus, immediately routinizable at the level of the design professions.

In contrast, "passive" solar energy is a completely architectural concept. Because of the integration of energy collection, storage, and distribution with the structure, function and aesthetic aspects of the building, "passive" solar energy building design separates the architect from routine reliance on external technical experts.

Photovoltaic (PV) solar technology is a solar/electric technology. It has application in any setting where electricity is used, and is, unlike "active" and "passive," not simply a technology for controlling comfort in buildings. But PV is a particularly effective energy technology system for buildings in several respects. First, the energy can be used for any purpose

requiring electricity, not just for heating and cooling. Second, most buildings (especially smaller residential structures) have a solar collection area which has an acceptable relationship to the energy demands of the volume enclosed by the skin. Third, PV can combine effectively with the latest "passive" solar technology and with energy conservation design approaches.

Solar Technology and M-C Housing

For reasons to be discussed later, it appears that the ideal solar system in M-C housing is a PV/passive hybrid. However, to place this assessment in context, it is necessary first to consider the requirements of "active" systems in relation to M-C housing.

"Active" systems are quite compatible with M-C housing, with three crucial exceptions: (1) storage, (2) roof loads, and (3) plumbing. <u>Storage</u>: An "active" system collects heat in one area, transports it to another for storage and, when needed, transports it to yet another for use. "Active" systems typically use a relatively large volume of rocks, or a smaller (though still large) volume of water, for thermal storage in a wellinsulated location. Storage is invariably beneath the house. Water storage involves a large tank area while dry storage calls for an even larger volume of rocks. Rock storage is incompatible with both production and siting of M-C housing, as is water storage if it involves "basement" space. If the water storage is not "basement," it demands a large floor area, reducing available space for other household purposes and calls for structural changes to support the load.

Roof loads: "Active" systems, particularly those using water for heat transport, require higher load-bearing capacity from roofs. Beyond the additional loading, the slope for winter heat collectors is ideally latitude plus 15°, a pitch much steeper than that of present M-C houses. While changes to accommodate both loading and slope are possible, external factors (for example, bridge heights) establish other limiting constraints. Moreover, the cost implications of such changes would have to be assessed. Plumbing: M-C housing provides heating and cooling by air duct systems. Plumbing is limited to household uses (kitchen, bathroom, laundry and so on). Thus, any "active" system using water would require major additions to the unit's plumbing system, in both size and distribution. Thus, the distribution, as well as collection and storage systems, are additions to current design and materials. Moreover, assuming that the collection, storage and distribution systems could be incorporated into the mobile components, they would also have to be engineered to meet the stress of transport.

This review of the three areas in which "active" solar technologies are incompatible with the present routines of M-C housing shows the extent of incompatibility. Adoption of "active" systems would entail major restructuring of the industry.⁶

"Passive" solar technologies, using neither mechanical heat transportation nor thermal storage separate from the structure, do not present the sorts of problems in M-C housing that "active" systems present. It was noted earlier that "passive" solar design demands that architects have a technical capability not presently considered an essential quality for designers to have. The site-built house is often individually designed or, where a design

is repeated, it must be modified for particular situations. This demands further technical input, as the impact on energy consumption of structure, function, aesthetics and location must be considered for each design. A consequence is either higher cost because of added design activity, or (more usually) the forgoing of the solar technologies. By comparison the M-C house can absorb the higher initial design effort because its impact can be spread over many repetitions. Indeed, because M-C housing must undergo DAPIA review for compliance with design and engineering criteria, it is not at all clear that there would be <u>any</u> increase in design cost because of "solar."

As noted in the discussion of structural properties of M-C housing, the HUD code already makes this form of housing more readily responsive to energy conservation criteria than site-built housing is. Because of this, the integration of "passive" solar technologies into M-C housing is already close to the industry's routine, for the demands of the "passive" system are reduced by the insistence on energy conservation already reflected in the HUD code's concentration on insulation and infiltration.

Recent shifts in "passive" solar technology make this integration with existing routine an even more likely possibility. "Passive" systems attempt to maximize thermal potential, collecting and storing it as heat in cold weather, and "cool" in warm weather. Thermal potential gain is achieved by the controlled exposure of large areas of glass in windows and clerestories. Keeping the heat inside or outside (depending on the season) is usually handled by some non-conveying barrier. For example, movable insulation for cloudy days and night time has been used, requiring someone to move it as needed. Storage for release of heat to maintain comfort

34

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levels typically has demanded large spaces. Large volumes of water in tanks exposed to insolation, (thereby obscuring views) were sometimes used. Such technologies call for a shift in aesthetic values, to say nothing of living habits, and have tended to cause "passive" solar approaches to be identified with atypical housing consumers. However, recent changes in materials (such as glazing with inherent thermal barrier qualities, and storage materials which can be installed in ceiling and floor spaces) have minimal impact on aesthetics, make no demands on space, and require no changes in living habits.⁷ Insofar as such materials merely replace existing materials, and require minimal (if any) changes in production technology, the potential for "passive" solar acceptance in M-C housing is significantly enhanced.

A hybrid PV/passive system provides a particularly appealing mix for M-C housing.⁸ The size requirement for the PV array is decreased by the efficiency of the passive system and the conservation techniques used.⁹ The regularity of unit design and defined market areas of M-C housing provides for an optimization in the relationship of structure, function, aesthetics and the climatic demands of the region.

The most complicating aspect of the hybrid is the placement of the PV array. If the different demands for energy to both heat and cool a building are roughly similar, the ideal slope for an array is the latitude of the site. U.S. latitudes range from 25° to 49°. In cold climates, where limited cooling is required, latitude plus 15° is ideal. In hot climates, where heating demands are infrequent, the ideal slope is latitude minus 15°.

In warm regions the slope poses minimal constraints, requiring as little as 10°. But cold climates can require a slope of as much as 65°. Insofar as arrays maintain their current material configurations (approximately 2'x3'), this necessitates roofs pitched to the maximum angle. This in turn creates transportation problems, with height limitations imposed by overhead barriers such as bridges. Similarly, if present array configurations and materials remain constant, there are additional roof load concerns. Though M-C housing already meets certain loading standards (often higher than site-built), substantial weight additions could create some difficulty.

Either of these issues could be resolved by materials development focusing on design requirements. For example, a ribbon technology (silicon crystals in a continuous ribbon, rather than small circular cells sliced from crystal rods) would allow, as an architectural solution, a number of rows of ribbons in a saw tooth array behind a screening fascia, providing the appearance of a flat roof while meeting slope requirements. Similarly, advances in materials could incorporate the cells into the basic roofing structure. Insofar as M-C housing is now shifting its approach to roof materials and appearance, with sloped and composition roofs only recently becoming common, there is considerable potential to experiment with new materials consistent with this industry-wide shift.

FACTORS INFLUENCING RECEPTIVITY TO SOLAR BY THE M-C HOUSING INDUSTRY

The preceding sections have described the structure of the M-C housing industry, reviewed the characteristics of the product, and discussed various solar technologies in relation to this form of housing. This section briefly reviews and summarizes those factors which will most influence the receptivity of the industry to solar technology of whatever form, and to the PV/passive hybrid in particular.

Price sensitivity. Though the changing profile of the M-C buyer indicates that the average consumer belongs to a higher socio-economic category than was once the case, the bulk of the market for this form of housing remains in the low- to middle-income bracket. Indeed, a primary sales argument has always been lower price. Thus, the impact on housing price of structural or material changes is a matter of considerable importance to both producer and consumer. Given a lower average sales price, the marginal impact of an additional dollar of cost on potential market share is much more severe than it would be on higher priced site-built housing. Any of the solar technologies discussed earlier has the potential of increasing unit production cost (and therefore purchase price), particularly "active" solar systems. What is not clear is the extent to which housing cost will be affected by solar technology. Any of the solar technologies reduces demand on external energy sources. Thus, to the extent that home purchase considerations involve a calculus of monthly housing costs (principal, interest, taxes, operating expenses) as opposed to initial cost, the impact of higher production costs of solar will be lessened.

Production Process. Quite apart from the direct impact on unit price of solar technology materials, their potential impact on the production process is important. There are two dominant considerations in a manufacturing approach to housing: simplicity and speed. Though the work team does not go as far as the repetition of a single task characteristic of auto assembly processes, M-C housing production still requires simplicity of construction tasks. Any material or production change which entails a complication in the assembly procedure will, therefore, be resisted. Similarly an uncomplicated but time-consuming task will also be resisted, as the industry routine and pricing structure requires regularity in component completion. For example, although it is a simple process, spray coating of ceilings has not been readily accepted because the drying time which is needed significantly slows down the total production process. Thus, one can see that the latest "passive" systems, which involve significant substitution of one material for another, will readily fit industry production routines. PV systems which involve new equipment and complicated wiring might be resisted, while those which replace current roofing with PV roofs, and which are "plugged in" to existing electrical systems, might be more readily accepted. Finally, the plumbing and storage requirements of "active" solar thermal systems clearly complicate current production approaches, and increase the probability of resistance.

Single code. The presence of a single code governing construction of M-C housing throughout the nation should prove to be a positive factor in enhancing the probability of acceptance of any innovation, not just solar. Where most building industry innovations follow an unwieldy and protracted dissemination path through "leader" states, in terms of building codes, the HUD code and its related administrative structure provide a single source

and a focused mechanism for determination of innovation acceptance. This has advantages not only in definitiveness of decision, but also in ability to produce a product in volume, because it need meet only one standard.

Industry aggregation. Compared with the fragmented site-built housing industry, M-C housing is an enormously aggregated industry. There are relatively few manufacturers, and of this limited set an even smaller number accounts for a large volume of all M-C production. Thus, acceptance by a single manufacturer means rather substantial market penetration. Given the competitiveness of the industry, advances in materials or processes are quickly adopted by all. Acceptance by any manufacturer means a sizable order from materials suppliers, enabling both to enjoy the concomitant economies of scale. Industry-wide acceptance increases those economies to an even greater extent.

<u>Quality control</u>. Factory assembly increases the probability of proper construction and installation and avoids the system breakdowns which are not uncommon in individual site-built housing. Because of in-plant inspection, and subsequent manufacturer liability (through both HUD and FTC processes), manufacturers tend to be hesitant about changes. While, initially, this is a barrier to acceptance, it eventually contributes to product confidence once changes have been accepted. Since one of the difficulties encountered in consumers' acceptance of solar thermal has been uneven system performance, variously attributable to design and installation, this assurance of quality, once consumers become aware of it, should be a desirable feature of M-C housing.

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CONCLUSION

The intent of this paper was to describe one segment of the housing industry -- mobile-component housing -- and to discuss the possibilities for acceptance of photovoltaics in this housing form. The preceding sections have described the structure of the M-C housing industry, reviewed the product characteristics of this housing form, assessed solar technologies relative to M-C housing, and considered factors influencing receptivity of solar in M-C housing. This section summarizes the body of the paper in the form of a set of conclusions on the possibilities for PV in M-C housing.

The possibilities for PV in M-C housing are greater than are the possibilities for "active" solar thermal. Further, these possibilities are even greater when combined with "passive" solar in a PV/hybrid. This ranking is the result of the extent to which these three general forms of solar technology mesh with existing routines of the M-C housing industry. Solar thermal has the fewest possibilities as its use would entail new and complicated systems for the M-C housing unit, requiring training for new skills on the production line and the probable increase in initial housing costs. PV would not require new systems, especially if one can assume sufficient development of the technology to provide for interaction with the grid, and simplified inverter systems enabling the DC production to be converted to AC. Passive solar is ranked highest in its possible acceptance by the M-C housing industry because it would involve minimal change in design or production approaches. Moreover this industry is already attuned to energy efficiency in its product. To the extent that either PV or "active" solar thermal are combined with "passive," their possibilities

for acceptance will be enhanced by the more favorable disposition of the M-C housing industry to "passive."

A number of characteristics of M-C housing and its industry bode well for the possibilities of PV acceptance, while some other characteristics tend to decrease the possibilities. Both the opportunities and the constraints derive from the <u>industrial</u> characteristics of this segment of the housing sector. Specifically, industry aggregation, single standard for construction, and design capability are all characteristics which increase the possibilities of acceptance. Price sensitivity, and the labor and time demands of the production process constrain them.

Because the M-C housing industry has relatively few producers, with those producers manufacturing houses for aggregate markets, the possibilities for rapid acceptance of PV in large quantities is enhanced. A positive decision by a single manufacturer can mean initial annual orders for PV materials for hundreds or thousands of housing units. Volume production, even for a single producer, can provide for economies of scale generally not attributable to the housing industry. Such economies are made even more possible because of the single construction standard for M-C housing. A frequent constraint on introduction of new products in housing construction is the limitation of differential standards. Though state codes tend to be somewhat regularized by their derivation from national or regional model building codes, each state code is different, or, at least, administered by a different body. Thus even though a product may meet industry standards (say an ANSI code for glass), its incorporation into housing construction may vary. By comparison the single construction standard and administering authority for M-C housing reduces the uncertainties created by potentially

differing code standards. Finally because M-C housing is produced in volume at central locations by manufacturers with staff functions for design and production control, the design, engineering and production monitoring difficulties inherent in any new product (and especially true for either PV or solar thermal) are reduced. Simply put, M-C housing manufacturers, by virtue of the nature of the industry (and its regulation), have the capability to deal with technically demanding new products. Thus, other factors being equal, technical complication will not be a barrier to acceptance of PV.

Because M-C housing has tended to be oriented to a lower-income market and make a major part of its selling pitch its price advantage, manufacturers are very sensitive to impact on unit price. The marginal impact of a dollar of additional cost is greater for M-C housing than site-built housing. Thus any product which increases first cost has a reduced possibility of acceptance. This will remain so for solar technologies, even though they may reduce annual energy consumption, so long as the routines for home lending do not consider life-cycle costing. Apart from the cost impact of new products, their potential impact on the production process also is a potential obstacle. In the case of PV the impact is not yet clear. Insofar as PV increases the need for sophistication in the labor force, or prolongs the amount of time needed to complete mobile-component, it will be a factor reducing the possibilities of acceptance. Improving the ease of installation and reducing the skill requirement for the installer will each enhance the possibilities of acceptance. Of course, this is as true for other forms of housing as well, though the precise implications of ease of installation

and labor-force skill requirements will vary among segments of the housing industry.

Though the general nature of the M-C housing industry suggests there are many attributes which increase the possibility of acceptance of PV, this conclusion is reached only by comparing PV and M-C housing attributes in the broadest sense. A more precise conclusion can be reached only after the nature of PV for specific housing use evolves. However, this analysis has suggested areas for the development of PV (in both product characteristics and in the approach to the M-C housing industry) which would enhance the probability of rapid acceptance.

NOTES

- 1. NAHM defines the nine classifications in the following way:
 - i. Pre-cut and/or shell homes -- the most basic package for small builders and the handyman who wants to save money by doing most of the work himself.
 - ii. Components -- wall panels; roof and floor trusses for builders of residential and commercial projects.
 - iii. Panelized homes -- open or closed wall, complete home packages built either to the customer's design or from one of the manufacturer's designs.
 - iv. Mechanical or utility cores -- modules which generally contain the home's kitchen and bathroom fixtures, heating equipment and electrical service panel.
 - v. Modular or sectional homes -- three dimensional living units shipped to the customer's foundation nearly 95% complete.
 - vi. Log homes -- log home packages.
 - vii. Geodesic dome homes -- spherically-shaped structures formed from a series of triangular-shaped panels.
- viii. Multi-family homes -- apartments, condominiums and townhouses.
 - ix. Commercial structures -- schools, churches, offices, restaurants, and all other commercial structures.

NAHM (1980), pp. 66-67.

2. Of course, it is technically feasible to move a mobile-component home, assuming retention of wheels and axle. However, such mobility has dramatically decreased in the recent past with the growth of multi-component houses, and is almost exclusive to single-component M-C houses. Recent data suggest only 1-3% of M-C homes are moved other than from factory to site.

3. This is a slight exception to our definition. This second component is not itself mobile, but is carried within the first. Such a two-component M-C house is referred to as an "expandable."

4. A further limitation in AHS data is the fact that vacant MH/Ts are not considered housing units, nor are those which are used for vacation homes.

(Fleetwood Industries data suggest this use to be about 6% of current sales.) Moreover, the Census Bureau itself reports, in Appendix B of the 1976 AHS, inefficiencies in the listing procedure for finding "mobilehomes" placed outside "mobile home parks." Since such units constitute an estimated 50% of all M-C homes occupied, this deficiency seriously biases AHS data.

5. The best M-C houses are "invisible" as M-C houses <u>per se</u> and so cannot contribute to a perception of their equivalence to site-built housing, as they are perceived as site-built houses.

6. A Colorado firm, Suntrek, has developed and recently introduced an "active" solar system for mobile-components which can either be incorporated into the original component, or retrofitted to an existing M-C house. It consists of vertical exterior collector panels which are used on a south-facing wall. An air-to-air system, Suntrek's collectors heat air for interior distribution, and a storage option is available. Although the efficiency is reduced at this angle they are reported to contribute as much as 30% of the annual heat requirement.

A major problem, which reflects the incompatibility of "active" with M-C housing is that this sort of efficiency could be improved by the use of storage facilities, but the structural changes, or site-work, necessary for this make it too complicated or prohibitively expensive. Without storage, when the panels raise the interior temperature to uncomfortable levels, the heat is ventilated out (i.e. wasted).

7. The solid state "passive" solar energy system works in the following way.

a. Collection. A double pane glass window with one of the interior surfaces coated with a transparent material which <u>reflects</u> heat (unlike normal glass which absorbs it) permits light to enter. Once the light has been transformed into heat, which happens when it is absorbed by solid materials, the window acts as the equivalent of a stud wall with 2 1/2" of fiberglass insulation. Unshaded windows, therefore, act to gain heat over a day, rather than lose it. This glass is expected to be on the market by the end of 1980 at an incremental cost over regular glazing such that, (in Boston) the payback period will be under three years. (Exact square foot costs are not available yet.)

b. Storage. The storage system (which "stores" both heat and cool, depending on the season) is based on the heat of fusion of a eutectic salt. When a substance melts or solidifies it does so at a constant temperature, absorbing or releasing a relatively enormous amount of energy to change state. (For example, a pound of water solidifying or thawing at a constant freezing point uses 144 times the energy it needs to rise or fall 1°F after the state change.)

Eutectic salts follow this pattern, and a mixture based on Glauber salt (NaSO₄.10H₂O) has been developed which changes state at 72°F. A quarter inch thick pad absorbs 180 BTU per square foot, equivalent to the heat capacity of nine inches of concrete of the same area with the additional advantage that heat is reused or absorbed at a constant temperature in the center of the human comfort range. The relationship between the window areas, the amount of salt storage, and the external climate can be calculated to hold the interior temperature fairly constantly near this point, except for periods of extremely bad weather, when an efficient fireplace can supply most of the back-up heat needed. (If any further heat is called for, electric resistance coils can put it directly into the salt storage from where it is released, again at 72°f. Photovoltaics and storage batteries can supply this energy.)

The salt is stored in flat plastic bags, or pads, in the ceiling, at an additional load of 5 lbs. per sq. ft. The pads are marketed at a cost of \$1.80/sq. ft. and, in a house in Massachusetts equivalent in size and design to a two-component M-C house, the total cost of the solar components <u>plus</u> the electrical back-up system was \$6,000 (1979), an amount <u>equal</u> to the cost of a gas-fired warm air system. Using off-peak electric resistance as back-up (and no fireplace) the 1980 electricity bill for heat is estimated to be less than \$200. Without taking into account the contribution from the kitchen, the lights and the people the fraction of heating energy required, which is contributed by the sun is 60%. (An additional benefit is that shading devices, working with the "mass equivalent" storage, will keep the house relatively cool in summer. The storage system is equally effective using a back-up cooling method, which in turn could be run from a P.V. array.)

8. A PV system is composed of an array of silicon cells which, when exposed to light, transform it into direct current (DC) electricity. This electricity can be further transformed into alternating current (AC) for household use. Excess DC current can be stored in batteries. Excess AC current can be sent into the regional power grid, with appropriate modifications in the household electric bill. An interactive grid-household system assumes the possibility of some household use of power from the grid.

9. While the same argument holds for site-built housing, the argument from economies of scale in design and installation costs for M-C housing make the PV/passive hybrid especially compelling for this housing form.

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1978 SUMMARY OF SHITHEMAS TO STATES

APPENDIX A

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Aladama Alaska Arizona Arizona California Compado Consisticut Iterang Plorida Georgia	422 52 286 134 465 257 11 72 709 410	120 2 261 26 1,859 105 1 11 1,137 265	542 54 547 160 2,324 362 12 83 1,846 675	531 64 325 167 381 219 18 69 693 411	85 268 25 1,562 129 0 15 1,035 258	616 69 593 192 1,943 340 10 84 1,720 669	ú6 3 71 396 184 449 265 21 119 729 521	145 11 265 35 1,958 136 1 17 1,089 357	208 82 661 219 2,407 401 22 136 1,818 878	569 * 87 324 205 367 252 36 116 614 477	163 10 244 38 1,573 69 0 16 929 359	732 97 560 243 1,940 341 36 132 1,543 836	714 40 359 242 445 263 33 125 616 542	157 3 2% 42 1,710 118 0 20 1,044 320	671 40 629 284 2,155 381 33 145 1,660 862	627 73 306 253 493 331 331 303 403 616 568	155 12 307 37 1,623 110 1,623 110 1,10 1,141 5,336	782 85 613 290 2,056 441 30 113 1,757 904	3,526 307 1,996 1,105 2,540 1,587 155 604 3,977 2,929	025 48 1,615 203 10,285 607 4 89 6,375 1,895	4,351 435 3,611 1,366 12,825 2,274 159 693 10,352 4,824	
IDNIO ILLINOIS INDIANA IGHA KANSAS KERTIKKY LOJISLANA MAINE MARTIAND MASSACIRGETTS	181 189 171 107 215 769 38 64 8	94 32 20 14 38 50 66 0 7 1	275 221 191 215 265 835 38 71 9	176 241 263 99 173 241 745 67 64 34	77 59 24 13 30 60 51 0 4 2	253 300 287 112 203 301 796 67 68 36	196 331 442 169 220 368 1,002 135 105 47	122 78 59 20 45 69 104 3 10 2	320 409 501 209 266 457 1,106 138 115 49	216 345 436 183 197 431 1,006 142 107 48	305 92 66 16 43 95 93 2 14 3	321 437 502 199 240 526 1,099 144 121 51	203 436 521 205 . 205 621 1,089 176 91 78	113 88 65 34 51 164 89 6 13 4	316 524 506 239 256 785 1,169 182 104 82	171 411 609 201 226 609 1,072 166 123 82	119 99 87 26 69 116 98 3 15 3	290 510 696 227 295 725 1,170 183 138 85	1,145 1,953 2,442 984 1,198 2,505 5,674 738 554 297	630 448 321 123 277 554 501 14 63 15	1,775 2,401 2,763 1,107 1,475 3,059 6,175 752 617 312	
KICHIGAN MINESOTA MISSISSIPPI MISSOURI MINIANA NEHRASKA NEMRASKA NEMRASKA NEMRASKA NEMRASKA NEMRASKA NEM MEXICO	30 3 208 226 207 182 123 128 43 31 348	38 18 35 65 27 32 146 1 11 80	341 226 261 272 209 155 274 44 42 428	500 277 235 214 172 94 95 43 340	42 25 57 47 30 22 120 5 10 65	542 302 292 261 202 116 215 50 53 405	751 313 352 296 243 114 127 86 69 435	79 59 46 108 58 25 180 5 18 80	830 372 390 404 301 139 307 91 87 515	688 336 298 343 214 74 130 98 59 406	96 75 74 91 54 37 185 9 16 71	784 411 372 434 268 111 315 107 75 477	830 334 343 366 272 128 105 116 67 384	124 60 73 106 58 32 175 8 18 83	954 394 416 472 330 160 200 124 85 467	881 360 396 205 123 82 121 66 315	125 56 61 111 61 36 183 4 17 90	1,006 416 462 50 296 159 265 125 83 405	3,953 1,828 1,850 1,765 1,765 656 667 509 335 2,228	504 293 351 528 288 184 989 32 90 469	4,457 2,121 2,201 2,293 1,606 840 1,656 541 425 2,697	F 43
NEW YORK N. CARCELINA NORTH DAKOTA CHIO OKLANKPA ORECON PERSYLWANIA RICOE ISLAND S. CARCELINA SOUTH DAKOTA	134 701 70 230 368 326 261 2 334 59	8 192 10 50 44 387 55 0 183 4	142 693 80 280 432 713 316 2 517 63	129 636 70 368 307 312 380 5 335 92	16 183 15 50 45 363 59 0 162 3	145 819 85 410 352 665 439 5 497 95	333 783 99 475 418 311 564 6 363 68	43 245 17 100 44 415 73 0 153 19	376 1,020 116 575 462 726 637 6 516 87	376 664 132 472 476 281 635 12 379 100	59 216 20 110 66 364 103 0 155 14	435 880 152 582 542 645 738 12 534 114	432 850 142 661 484 282 795 14 397 99	60 268 30 108 54 470 117 0 182 24	492 1,118 172 769 538 752 912 14 579 123	431 700 150 646 522 241 764 5 430 103	45 274 42 163 46 440 119 0 186 15	476 1,054 192 809 568 681 883 5 616 118	1,835 4,414 663 2,852 2,595 1,743 3,399 44 2,238 521	231 1,378 134 581 299 2,439 526 0 1,021 79	2,066 5,792 797 3,433 2,694 4,182 3,925 44 3,259 600	
TERRESSER TEXAS UTNI VERMONT VIRGINIA WASUINGTON M. VIRGINIA MISCOLGIN WISCOLGIN WOMING DC & US TERR.	227 1,818 103 16 242 478 121 155 115 . 0 24	50 218 55 1 62 508 27 12 28 0 0	277 2,036 158 17 304 906 148 167 143 0 24	245 1,610 106 226 469 147 197 105 0	52 225 58 0 57 496 33 15 26 0	297 1,835 164 12 283 965 100 212 131 0 0	348 2,190 99 50 379 571 329 294 130 0 3	96 303 48 0 83 553 47 28 21 0 0	444 2,493 147 50 462 1,124 376 322 151 0 3	365 1,091 85 50 326 477 359 221 128 0 1	100 253 57 0 101 528 74 26 24 0 0	465 2,144 142 50 427 1,005 433 247 152 0 1	476 2, 161 107 72 408 475 477 359 143 0 4	101 293 56 0 142 633 102 29 45 0 0	577 2,454 163 72 550 1,108 579 308 188 0 4	445 2,047 112 53 437 437 473 351 159 0 1	112 310 61 2 114 628 89 38 45 0 1	557 2,357 173 55 551 1,065 562 309 204 0 2	2,106 11,717 612 261 2,018 2,907 1,906 1,577 780 0 33	511 1,602 335 3,346 372 148 109 0 1	2,617 13,319 947 264 2,577 6,253 2,278 1,725 969 0 34	
DEST. PEND.	50	4	54	20	6	26	35	7	42	39	5	44	23	5	28	47	6	53	214	33	247	
TOTAL	12, 390	6,460	18,850	12,757	5,989	18,746	17,109	7,490	24,509	16,281	6,933	23,214	18,001	7,772	26,573	18,582	7,853	26,435	95,920	42,487	138,407	
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SOURCE: NCSBCS

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SUMMARY OF SUITMENTS TO STATES

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		JULY			ALGUST	•	S	EPTH IN	R		0010	DUER		NOVI	MER		DECEMBER		TOTAL		
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ALANAMA ALASKA NRIZZAVA ANGULISAS CALIFORNIA COLEMAJO COLEMAJO COLEMAJO DELAMARE FILORIDA GEORGIA	495 24 249 167 336 259 37 67 479 441	106 7 239 33 1,227 81 3 11 745 251	601 31 408 200 1,563 340 40 78 1,224 692	802 7 313 212 465 301 51 97 805 552	169 6 365 36 1,576 133 4 26 1,380 358	970 13 678 248 2,041 434 55 123 2,105 910	644 17 356 207 367 1 292 34 118 694 1 434	158 5 402 47 ,236 119 1 14 ,278 309	802 22 758 254 1,603 411 35 132 1,972 742	509 5 437 247 413 312 40 127 7/3 490	165 3 422 44 1,328 116 0 16 1,413 332	754 8 859 291 1,741 420 40 143 2,186 922	546 11 432 193 291 351 19 61 939 301	143 2 455 28 1,110 106 1 1 1,397 266	689 13 887 221 1,401 457 20 72 2,336 647	403 3 448 134 239 235 18 48 913 273	98 1 409 26 904 98 0 2 1, 303 196	501 4 857 160 1,143 333 18 50 2,216 469	3,479 67 2,235 1,160 2,111 1,750 199 518 4,603 2,571	838 24 2,292 214 7,301 653 9 80 7,516 1,731	* 4, 317 91 4,527 1, 374 9,492 2,403 208 598 12,119 4,282
TENKO II J.IRDIS IRDIARA IOMA KANSAS KIMTUCKY IOUISIANA HAINE RATYI AND HASSACHUSETTE	149 336 545 125 143 382 834 159 72 53	76 77 60 21 38 87 73 2 8 4	225 413 605 146 181 469 907 161 60 57	171 498 693 221 204 538 1,129 197 93 80	135 87 88 27 57 122 92 2 17 3	306 585 781 248 261 660 1,221 199 130 83	101 399 604 157 217 463 882 147 100 82	80 63 25 38 93 98 4 14 10	261 479 667 102 255 556 980 141 114 92	179 409 610 100 229 451 1,136 116 108 66	85 90 72 26 47 74 81 2 10 10	264 499 602 214 276 535 1,217 110 110 110 76	184 336 457 138 215 344 932 69 95 41	89 56 54 28 38 59 112 1 2 9	273 392 511 166 253 403 1,044 70 107 50	156 166 267 125 151 227 762 52 87 25	65 35 28 12 41 31 71 1 9 3	221 201 295 137 192 258 833 53 96 28	1,020 2,144 3,176 954 1,159 2,415 -5,675 730 555 347	530 425 365 139 259 466 527 12 70 39	1,550 2,569 3,541 1,093 1,418 2,081 6,202 742 625 386
MICHIGAN MIRMENTA MISSISSITPI MISOURI MINTINA NERRASKA NIVA N N. IVASPILITZ NEW JEISFY MEW JEXICO	754 317 307 242 215 84 85 76 41 275	88 47 55 77 53 33 139 8 17 50	842 364 362 319 268 117 224 84 58 325	1,009 379 373 340 250 122 119 102 110 337	104 67 71 89 60 36 218 10 33 78	1,113 446 444 429 310 158 337 112 143 415	838 275 323 358 184 67 111 84 84 94 381	97 73 59 99 44 42 148 10 23 82	935 348 302 457 228 109 259 94 107 463	856 275 376 393 182 112 140 77 75 333	125 66 66 110 48 33 181 1 27 81	981 341 442 503 230 145 321 78 102 414	612 157 262 348 159 89 111 55 78 324	103 29 62 81 29 21 175 4 27 65	715 105 324 429 188 110 286 59 105 369	417 132 238 205 118 67 63 57 51 278	59 27 45 59 11 15 160 2 13 65	476 159 283 264 129 82 223 59 64 343	•4,486 1,535 1,879 1,886 1,108 541 629 451 439 1,928	576 309 358 515 245 180 1,021 35 140 421	5,062 1,844 2,237 2,401 1,353 721 1,650 486 579 2,349
NEW YORK N. CARCE INA NDIRTI DAKOTA CHIO OKLANKAA ORIXIXI PENNSYLVANIA INKIDE ISLAND E. CANOLINA SOUTH DAKOTA	280 630 115 471 399 231 576 8 337 86	54 181 27 105 42 354 86 1 144 16	334 811 142 576 441 585 662 9 1 481 102	413 855 127 745 633 295 816 7 472 103	57 273 32 134 56 477 118 0 199 18	470 1,128 159 879 639 772 934 7 671 121	296 764 94 635 540 237 706 10 374 65	46 250 28 119 56 466 106 0 369 14	342 1,014 322 754 596 703 012 30 543 79	278 855 92 653 547 240 590 10 444 94	41 268 31 132 71 434 75 2 198 16	319 1,123 123 705 610 674 673 15 642 110	191 758 66 474 486 247 425 1 380 65	21 285 28 80 01 345 56 0 219 8	212 2,043 94 562 567 592 481 1 599 73	148 542 45 270 354 172 289 2 319 35	24 101 8 55 35 276 36 0 154 7	172 723 53 325 309 448 325 2 473 42	1,606 4,404 539 3,248 2,959 1,422 3,410 41 2,326 448	243 1,430 154 633 341 2,352 477 0 1,003 79	1,849 5,842 693 3,881 3,300 3,774 3,887 44 3,409 527
TENDESSEE TEXAS UTAI VENEART VINGINIA WASHINGTON W. VINGINIA WISCORS IN WACHING LC & US TERR FXIORT	328 1,636 106 51 307 334 305 259 111 1 0	92 262 49 25 474 76 33 25 0	420 1,698 155 53 402 808 381 292 136 1 0	305 2,190 92 65 440 483 476 346 177 0 0	104 357 71 201 584 93 34 35 0	489 2,547 163 67 541 1.367 569 00 2.12 0 0	360 1,917 115 53 348 409 361 295 170 0 0	90 313 43 2 91 577 74 19 38 0 0	450 2,230 158 55 439 986 435 314 208 0 0	451 2,220 97 55 367 464 314 280 137 1 0	101 043 64 96 561 54 20 09 0	532 2,571 161 56 463 1,125 368 300 176 1 0	325 1,953 108 23 293 481 226 174 174 177 0 0	101 209 36 0 75 505 46 10 25 0 0	426 2,242 144 23 368 1,086 272 184 202 0 0	249 1,458 78 17 219 302 165 121 96 0 0	43 238 40 53 418 25 14 22 0 0	292 1,696 118 17 272 720 190 135 118 0 0	2,099 11,002 596 264 1,974 2,473 1,847 1,475 660 2 0	531 1.002 303 7 511 3.419 368 130 184 0 0	2,629 13,104 899 271 2,485 5,692 2,215 1,605 1,052 2 0
DEST. TEND.	41	16	57	39	20	59	50	1.2 7 774	· · · · · · · · · · · · · · · · · · ·	hy	45	115	207	54	261	298	5.1	359	704	220	924
TCTAL.	14,360	5,850	20,210	19,729	0,313	28,042	16,889	1,4/4	£97,193	111,031	7,767	(3, 790	15,290	5,945	22,235	11,537	5,479	17,016	95,8.6	41,628	137,464
SOURCE: Na	DURCE: National Conference of States on Building Codes																				

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1978 SOURCE: NCSBCS

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APPENDIX B

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COMPARISON OF DESIGN CRITERIA SINGLE FAMILY DWELLING FEDERAL MOBILE HOME STANDARD UNIFORM BUILDING CODE

Design Elements

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Design Criteria

CODES	Federal Mobile Home	UBC 1976
	Construction and	UPC 1976
	Safety Standards	NEC 1978
ZONING		
Occupancy	One Family Dwelling	R-3 (residential single family)
Type of Construction	Per local jurisdictions	V-N (wood frame construction combustible)
Fire Zone	Per local jurisdictions	3 (residential)
Location on Property	Per local jurisdictions	Over 3' to prop. line for unprotected opening in walls
STRUCTURAL DESIGN LOADS	(1)	(1)
Roof Live Load	20 PSF (1)	$20 \text{ PSF}^{(1)}$
Wind Load - horizontal	15 PSF	15 PSF
Wind Load - uplift	9 PSF	11.25 PSF
Floor Live Load	40 PSF	40 PSF
Horizontal Load on		
Int. Walls	5 PSF	None specified
Live Load Deflections:		*
Floor	L/240	L/240
Side Wall	L/180	L/120
Roof/Ceiling	L/180	L/180
Test Load Requirements	2.5 x L.L.	2.5 x L.L.
ARCHITECTURAL DESIGN -		
BUILDING PLANNING		
Glazed Area	8% of floor area	10% of floor area
Vent Area	4% of floor area	5% of floor area
Minimum Room Size:		
One Room	150 sq uare fee t	150 square feet
Bedroom (2 persons)	70 square feet	70 square feet
Bedroom (min.)	50 square feet	70 square feet
Min. Room Dimension	5 feet	7 feet
Closet Depth (required in		
each bedroom)	22 inches	None specified
Toilet Compartment	30" wide with	30" wide with
•	21" clear	24" clear
Hall Width	28 inches	None specified
Ceiling Height - General	7 feet	7 feet, 6 inches
Exterior Wall Covering	Weather resistive	Prescribes minimum
	and corrosion	materials and
	resistant fasteners	fasteners

Comparison of Design Criteria Page 2

Design Elements

Design Criteria

FIRE SAFETY 2 1 Exit Doors No Yes Specify Ext. Door Locations Yes Bedroom Egress Window: Yes 5.7 square feet Min. Size 5 square feet 36 inches 44 inches Min. Sill Height Gyp. bd. + 25 FS max. Not specified Furnace Compartment Lining Gyp. bd. + 25 FS max. Not specified Water Heater Comp. Lining Not required Required or use Furnace/Water Heater sealed combustion Compartment - Sealed from living area environment appliance Not specified Gyp. bd. + 50 FS max. Kitchen Range Back Wall Yes Protect Cabinets Above Range Yes Yes Yes Smoke Detector(s) 10 feet 8 feet Fire Blocking in Walls Flamespread in Living Areas: Class III ⁽²⁾ 200 or less (Class III) Walls Class III ⁽²⁾ 200 or less (Class III) Ceiling THERMAL ENERGY CONSERVATION Condensation Control: Vapor barrier Vapor barrier Walls Vapor barrier Not specified Ceiling Specified Not specified Air Infiltration Control Specified Not specified Max. Heat Loss Double Glazing or Not mandatory Storm Windows Mandatory Yes Requires Listed Appliances Yes Required Interior Heated to 70°F Required PLUMBING Hot and Cold Supply: No. of fixtures No. of fixture units Pipe Sizing No Yes Plastic Pipe DWV System: Comparable Comparable Drain Pipe Size Yes No Horizontal Wet Vent 135° total Cleanouts Over 45° each, 360° total Listed Materials and Yes Yes Fixtures Comparable Comparable Gas Piping Yes Yes Vertical Wet Venting

Comparison of Design Criteria Page 3

	Design Criter	ria
Yes		Yes
Not permitted		Permitted
Comparable		Comparable
Comparable		Comparable
Yes		No
Per local juris	dictions	Specified
Per local juris	dictions	Specified
Specified		Specified
	Yes Not permitted Comparable Comparable Yes Per local jurise Per local jurise Specified	Design Criter Yes Not permitted Comparable Yes Per local jurisdictions Per local jurisdictions Specified

(1)

Building official or home manufacturer may adopt higher loads to meet local conditions.

(2)

Not applicable to finishes in kitchen or bathroom.

SOURCE: Fleetwood Enterprises.

Work reported in this document was sponsored by the Department of Energy under contract No. EX-76-A-01-2295. This report was prepared as an account of work sponsored by the United States Government. Neither the United States nor the United States Department of Energy, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product or process disclosed or represents that its use would not infringe privately owned rights.

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