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Division of Codes and Standards - Administrative Office  
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## Information Bulletin MH 85-12 (MH)

TO: COMMERCIAL COACH MANUFACTURERS, COMMERCIAL COACH DEALERS and  
DIVISION STAFF

SUBJECT: PLAN APPROVAL REQUIREMENTS

This Information Bulletin is issued in order to clarify requirements for manufacturing commercial coaches for sale, rent, lease or use in California. Both out of state and California manufacturers of commercial coaches as defined in Health and Safety Code, Section 18001.8 are subject to the following requirements:

1. Manufacturers must hold a valid commercial coach manufacturer's license issued by the department.
2. Manufacturers must only sell to dealers licensed by this department for the sale, rent or lease of manufactured homes, mobilehomes, and/or commercial coaches. Commercial coaches held out for rent or lease may only be offered by a licensed dealer.
3. Manufacturers must obtain plan approvals prior to manufacturing commercial coaches. Plan approval procedures are explained in detail herein.
4. Manufacturers must obtain inspection by the department of commercial coaches during the manufacturing process.
5. Unless otherwise permitted by the department, all commercial coaches shall bear department insignia prior to leaving the manufacturing facility.

The California Administrative Code, Title 25, Chapter 3, Subchapter 2 provides for two approaches to obtaining department insignia of approval. First, a manufacturer of repetitive models may submit and obtain Model Plan Approval. Secondly, a manufacturer of custom units where model plan approval may be too time consuming and comprehensive, may submit and obtain approval of a Structural and Floor Plan Approval. Following is a detailed explanation of both methods:

## MODEL PLAN APPROVALS

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For manufacturers who are manufacturing repetitive designs, plan approval may be obtained under the model plan approval method in which complete plans contain details of the construction, fire safety, plumbing, mechanical, or electrical systems and equipment. In addition, the manufacturer must obtain approval for a quality control program. The manufacturer may then apply to the department for insignia via the model plan approval and conduct a quality control program and benefit from a lower frequency of inspection than the Structural and Floor Plan Approval method.

The Administrative Code permits a manufacturer of models to construct one prototype of each model intended for production prior to obtaining approval for the structural system. However, prior to commencing construction, the manufacturer shall submit a written request to the department and have obtained approval for the construction of a prototype. Plan approvals, as described herein, must be obtained prior to the issuance of a department insignia.

## STRUCTURAL AND FLOOR PLAN APPROVAL

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Should a manufacturer not choose to obtain Model Plan Approval, the manufacturer must have at least a plan of the structural system approved by the department for any commercial coach to be manufactured. Additionally, the manufacturer must have an approved floor plan if the commercial coaches to be manufactured exceed 1000 square feet in gross floor area or will contain toilet facilities. From the floor plan, compliance with fire safety, occupancy and handicap requirements may be determined.

The California Administrative Code provides that if a manufacturer chooses, he/she may, after obtaining the structural system and floor plan approvals as previously described, obtain plan approval for any plumbing, mechanical, or electrical systems and equipment or have such systems and equipment visually inspected by the department. However, visual inspections will be made of the entire system regardless of how many inspections are needed to inspect the complete system.

All construction must be in accordance with the approved plans. When changes become necessary, the manufacturer must submit and obtain approval for the proposed change prior to manufacturing. When a plan for a structural system is to be changed which requires engineering analysis and signature by a California licensed engineer or architect, and the engineer or architect designing the change is not the original designing engineer or architect, the new design engineer or architect shall review, stamp and sign the original design package as the responsible designer for the complete design.

No manufacturer shall commence construction of any commercial coach or portion thereof, without first obtaining approvals as described herein. Should the department discover units on a production line without plan or prototype approval, as required in the California Administrative Code, such units will be red-tagged and ordered to be held for department inspection after the approvals are obtained and available at the manufacturing facility. If a manufacturer continues the construction of a red-tagged unit and conceals structural components, any plumbing, mechanical or electrical system or equipment, those concealing materials will be required to be removed to facilitate the department's inspection.

Should further clarification be necessary, please contact Richard Weinert Manufactured Housing Program Manager at (916) 445-3338.

John Ventura, Chief