



1896 Preston White Drive
Reston, VA 20191
T 703 620 6003
F 703 620 5071

March 25, 2019

Senate Committee on Business and General Government

RE: Please Support Senate Bill 410; Relating to exclusions from state building code regulation.

Chairman Riley, Vice Chair Girod and members of the Senate committee on Business and General Government,

My name is Nicholas Rudowich and I am a Manager of Government Affairs for the RV Industry Association. The RV Industry Association is the national trade association representing the diverse manufacturing businesses which manufactures more than 98 percent of all recreational vehicles (RV) produced in the United States—including motorhomes, travel trailers, fifth-wheel travel trailers, folding camping trailers, park model RVs, and truck campers. We are the unifying force for safety and professionalism within the RV industry and work with federal and state policymakers to promote and protect the RV industry and its members.

I write you today to ask for your support for Senate Bill 410. Senate Bill 410 in its current form will eliminate the Department of Consumer and Business Services from the regulation of Recreational Vehicles. This would align Oregon with a vast majority of states which do not regulate the manufacturing of RVs in any way. With this elimination, there will be no further need to attach an additional and duplicative Oregon insignia of compliance or seal to a Recreational Vehicle or Park Model Recreational Vehicle (PMRV). This process was a hinderance to the industry. Oregon was the only state where a state insignia of compliance or seal was needed to sell or resell a RV in that state. The RV Industry Association members place a RV Industry Association seal on their vehicles after manufacturing. These seals represent that the vehicles have been certified to be built in accordance with the nationally recognized NFPA 1192 Standard for RVs and the ANSI A119.5 standard for PMRVs.

The RV Industry Association has worked for over 50 years to develop these nationally recognized manufacturing standards for RVs. The National Fire Protection Association 1192 Standard for RVs and the American National Standards Institute A119.5 Standard for PMRVs are both considered by many to be benchmarks of vehicle industry. Both standards have gone through and continue to use the rigorous certification programs. These programs bring together industry, building, and safety leaders to develop robust and time-tested building and safety standards.

In addition, on November 16, 2018 the Federal Department of Housing and Urban development issued a final rule exempting RVs and PMRVs built to the NFPA 1192-15 and the ANSI A119.5-

15 standards from its per-view. This once again re-enforced just how robust and thorough these RV Industry Association developed standards are.

To conclude, we have been engaged with important stake holders in the state of Oregon, such as Building Codes Division Director Mark Long, to see that this process is done correctly and treats the RV Industry fairly. Mark and his division have been a great partner to the RV industry and the RV Industry Association for over 20 years, and our most recent interactions have been no different.

The changes that Senate Bill 410 would implement are common sense and help promote not only the national but in-state RV industry which as of 2015 contributed 1 billion dollars in total direct economic output and supported almost 6,000 jobs in the state of Oregon. For this and the other reasons I mentioned above, I urge you to support and pass Senate Bill 410.

Nicholas Rudowich
Manager, Government Affairs
RV Industry Association