



AMERICAN ARCHITECTURAL  
MANUFACTURERS ASSOCIATION  
TECHNICAL INTERPRETATION

INTERPRETATION  
NUMBER

#49

Addendum Added:  
3/14

**DATE OF INQUIRY:**

November 30, 1993

**PERTINENT AAMA SPECIFICATION(S):**

AAMA 1704-85, "Voluntary Standard Egress Window Systems for Utilization in Manufactured Housing"

**SECTION(S) IN QUESTION:**

2.4.1, 2.4.5, 4.4

**INTERPRETATION REQUESTED:**

The request for interpretation is divided into two parts as follows:

1. Under AAMA 1704-85, are the primary window sash permitted to be removed to obtain the required egress opening dimensions?
2. If the answer to the first question is 'yes', then under AAMA 1704-85 can the weight of the primary window sash being removed exceed 20 pounds?

**INTERPRETATION MADE:**

1. AAMA 1704-85 does not prohibit removal of the primary window sash. Therefore, the primary window sash is permitted to be removed to obtain the required minimum egress opening dimensions, provided all other requirements of the standard are met, and the operating instructions required in Section 2.4.1 describe in detail how sash removal and re-installation is to be performed.
2. Paragraph 2.4.5 requires that the single vector force required to complete each egress sequence of the system not exceed 20 pounds. This does not prohibit the primary window sash from weighing more than 20 pounds. However, Paragraph 4.4 requires that in appurtenances, removable panels requiring "set-aside" not exceed 20 pounds maximum weight. Therefore, primary window sash which are removed to obtain minimum egress dimensions are permitted to weigh more than 20 pounds provided all other requirements of the standard are met, and it can be demonstrated that the single vector force required to complete each egress sequence, including removal, does not exceed 20 pounds. Such demonstration must follow exclusively the directions provided in the operating instructions required by Section 2.4.1. Removable panels which require "set-aside" in appurtenances are not permitted to exceed 20 pounds maximum weight.

**APPROVAL ACTION:** Approved by the Manufactured Housing Council – 2/28/94

**ADDENDUM (March 6, 2014):** Recent rulemaking by the Department of Housing and Urban Development (HUD) has rendered moot the interpretation above. Final rules were adopted 12/9/13 for the Manufactured Home Construction and Safety Standards 24 CFR Part 3280. While continuing to recognize AAMA 1704-85, Standard Section 3280.404 will be updated effective 6/9/14 to add the following language: "**(3) Windows that require the removal of the sash to meet egress size requirements are prohibited.**" While not specifically cited in the standards language, it is assumed as of this writing that the new language will also apply to appurtenances, even though those appurtenances are not prescriptively required to meet the requirements of or be certified to AAMA 1704.