



FEMA

January 31, 2012

Mark Weiss
Senior Vice President
Manufactured Housing Association for Regulatory Reform
1331 Pennsylvania Avenue, NW, Suite 508
Washington, DC 20004

Dear Mr. Weiss:

Thank you for your January 10, 2012 letter concerning the United States Fire Administration's fact sheet entitled: *Live Safely in Your Manufactured Home -- A Fact Sheet on Manufactured Home Safety*. We are committed to ensuring publications and other information resources we provide for our stakeholders and the public are accurate. I appreciate you bringing this matter to my attention.

We removed the publication from our website, as well as its companion fact sheets, while we review, analyze and update the information. We will re-post the fact sheet(s) to the website once our analysis is complete.

Please feel free to contact Sandy Facinoli, Prevention and Information Branch Chief, if you have additional questions or suggestions concerning our publications or website. You can reach Ms. Facinoli at sandra.facinoli@dhs.gov or 301-447-7569.

Sincerely,

A handwritten signature in black ink, appearing to read "Ernest Mitchell".

Ernest Mitchell
Fire Administrator
United States Fire Administration



Manufactured Housing Association for Regulatory Reform

1331 Pennsylvania Avenue, NW • Suite 508 • Washington, DC 20004 • 202-783-4087 • Fax 202-783-4075 • mharrdg@aol.com

January 10, 2012

VIA FEDERAL EXPRESS

Hon. Ernest Mitchell, Jr.
Administrator
U.S. Fire Administration
16825 South Seton Avenue
Emmitsburg, Maryland 21727

Re: Misleading Manufactured Housing Fire Safety "Fact Sheet"

Dear Chief Mitchell:

I am writing on behalf of the members of the Manufactured Housing Association for Regulatory Reform (MHARR). MHARR is a Washington, D.C.-based national trade association representing the views and interests of producers of manufactured housing regulated by the U.S. Department of Housing and Urban Development (HUD) pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974, as amended by the Manufactured Housing Improvement Act of 2000 (42 U.S.C. 5401, et seq.).

MHARR has obtained a copy of a United States Fire Administration (USFA) document entitled "Live Safely in Your Manufactured Home -- A Fact Sheet on Manufactured Home Safety." This document, posted on the USFA internet website, has recently been publicized extensively in the media. The "Fact Sheet," however, which was "last reviewed" by USFA on December 28, 2006, contains -- and is based upon -- data that is outdated and inaccurate. Moreover, the "Fact Sheet" omits significant relevant information, making it highly misleading for consumers and extremely prejudicial to the manufactured housing industry.

First, the "Fact Sheet" fails to mention anywhere that "manufactured homes" are comprehensively regulated under federal construction and safety standards promulgated and enforced by HUD, including specific "fire safety" standards (see, 24 C.F.R. 3280.201, et seq.) that must be met by each new manufactured home. Consumers should know -- and have a right to know -- that fire safety in today's manufactured homes is

subject to federal regulations designed to protect occupants and the public against any “unreasonable risk of death or injury” due to fire, including an industry-leading smoke alarm standard.

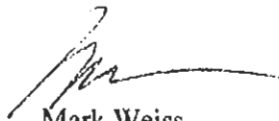
Second, and even more importantly, the USFA “Fact Sheet” fails to distinguish between the fire safety record of pre- and post-HUD standard manufactured homes. By simply lumping these two categories together, the “Fact Sheet” distorts and misrepresents to the general public and especially potential homebuyers, the fire safety track record and performance of modern, post-HUD standard manufactured homes, which equals or exceeds that of other one or two-family homes.

Specifically, according to the latest report on manufactured home fire safety published in July 2011 by the National Fire Protection Association (NFPA), manufactured homes have a lower incidence of fire per 1,000 homes than other occupied one or two-family dwellings. Similarly, manufactured homes have “a lower rate of civilian fire injuries per 100,000 occupied housing units than other one or two-family homes” and post-HUD standard manufactured homes are more likely than other homes to have fires confined to the room of origin (see, NFPA, “Manufactured Home Fires,” John R. Hall, Jr., July 2011 at pp. 5, 10). Most significantly, though, according to an October 14, 2011 NFPA update to this report (copy attached), among post-HUD standard manufactured homes, the fire death rate per 100,000 occupied homes is “comparable” to that of other one or two-family homes.

Consequently, the most recent data shows: (1) that the HUD manufactured housing fire safety standards work; and (2) that the key assertion contained in the “Fact Sheet,” that “manufactured homes have a fire death rate ... 32-50 percent higher than the rate for other dwellings” (emphasis added), is misleading and inaccurate.

Given these serious omissions and errors, the USFA “Fact Sheet” is not factual and should be withdrawn. Manufactured housing provides truly affordable, non-subsidized home ownership accessible to all Americans. Homebuyers and current residents deserve correct information that accurately portrays today’s manufactured homes. The fire safety “Fact Sheet” fails to meet this standard. As a result, it should be expressly retracted and removed from all USFA and Federal Emergency Management Agency (FEMA) sources.

Sincerely,



Mark Weiss
Senior Vice President

Attachment