



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

September 18, 2012

Honorable Barack Obama
President
The White House
1600 Pennsylvania Avenue, N.W.
Washington, D.C. 20500

Dear President Obama:

We are writing to you 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 comprehensively regulated under federal law by the U.S. Department of Housing and Urban Development (HUD). MHARR's members are primarily independent producers of manufactured housing, located throughout the United States.

Manufactured homes – constructed in a factory and transported to a purchaser's home-site or a manufactured housing land-lease community – are America's most affordable type of housing. Without government subsidies or grants, a typical manufactured home, adaptable to either rural or urban use, costs less than half the structural price of an average site-built home and is even more affordable than rental housing, as determined by a HUD study. More than any other type of housing available today, manufactured housing has the demonstrated capacity to help families at every rung of the economic ladder achieve the American Dream of home ownership.

Yet, the manufactured housing industry, a uniquely American industry comprised predominantly of smaller family-owned businesses – businesses that provide much-needed job opportunities across the United States -- is struggling as never before, along with millions of mostly lower and moderate-income Americans who want nothing more than to live in a home of their own and rely on the availability of safe, decent and affordable manufactured homes.

The numbers are startling. Over the past decade, manufactured home production has declined by more than 86% (from 373,143 units in 1998 to 51,606 in 2011). Over the same period, more than 70% of the industry's production facilities have closed (from 430 to fewer than 120), as have more than 7,500 retail centers, with more than 200,000 jobs lost throughout the entire manufactured housing sector. Sadly and inexplicably, the chief reason for this massive decline and its corresponding negative impact on job creation and affordable housing opportunities lies with federal government policies that either ignore manufactured housing altogether, or needlessly discriminate against manufactured housing and manufactured housing consumers.

At HUD, the nation's housing agency, manufactured housing is effectively excluded from the policy mainstream concerning both housing opportunity and financing. Despite longstanding pleas, there has been no effort by HUD to incorporate manufactured homes as a component of any of the numerous

housing programs it administers. Because of the inherent affordability of manufactured housing, even a minor investment to include manufactured housing within those programs would produce disproportionately positive returns for Americans. Yet, in HUD's latest Strategic Plan, manufactured housing – the most affordable housing in America -- is virtually ignored as a resource in fulfilling HUD's mission to "create strong, sustainable, inclusive communities and quality affordable homes for all."

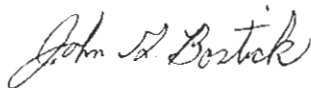
This is particularly ironic, since the value of manufactured housing as an affordable housing resource for all Americans and the role of the industry as an engine of job creation has united lawmakers on both sides of the aisle in support of manufactured housing for decades. As a result, Congress has passed – on a virtually unanimous basis each time – good laws designed to help the industry and its consumers, and expand the availability of affordable manufactured housing for the nation's homebuyers. Yet, these good laws have been squandered by government agencies at all levels that have either ignored them or twisted their meaning beyond recognition. For example, HUD has failed to fully and properly implement not once, but twice – in 1974 and 2000 – manufactured housing laws passed by Congress with unanimous bi-partisan support designed to pave the way for the transition of manufactured homes from the "trailers" of yesteryear to legitimate modern "housing" and ensure parity for manufactured homes and manufactured housing consumers with other types of homes. This, in turn, has provided a green light for other governmental entities to discriminate against manufactured homes and manufactured homebuyers.

Clearly, though, the most devastating government actions have blunted the ability of lower and moderate-income consumers to finance the purchase of an affordable manufactured home. For example, discriminatory policies adopted by the Government Sponsored Enterprises (under the de facto control of the Federal Housing Finance Agency since 2008) have limited manufactured housing loans to less than 1 per cent of their total portfolios. Meanwhile, discriminatory federal securitization criteria have sharply curtailed government-insured manufactured home loan originations – particularly through a crucial Federal Housing Administration (FHA) program. These policies, based on conjecture and "perception" rather than any hard data concerning current-day manufactured housing loans, have undermined the availability of both public and private financing for manufactured homes, effectively excluding millions of lower and moderate-income consumers from home ownership altogether.

To ensure the American Dream of home ownership, or simply a safe, decent and affordable place to live for every American family, regardless of income, affordable, non-subsidized manufactured housing needs to be – and should be -- part of the solution. But that will take leadership from the nation's Chief Executive, which is why we are writing. Following the upcoming election, we will seek a dialogue and engagement with your office designed to bring positive change to this major housing issue.

We thank you in advance for your consideration of these critical matters which affect the well-being of millions of lower and moderate-income American families.

Sincerely,



John G. Bostick
Chairman



Danny D. Ghorbani
President



Manufactured Housing Association for Regulatory Reform

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September 18, 2012

Honorable Mitt Romney
Republican Nominee for President
585 Commercial Street
Boston, Massachusetts 02114-9756

Dear Governor Romney:

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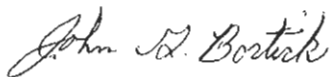
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John G. Bostick
Chairman



Danny D. Ghorbani
President