

Mr. Sweigart,

"I read your article, "Deadly home fires spark fight over regulations". After reading your article, the only thought that came to my mind is 'who is fooling whom?'.

I am a licensed engineer in Ohio and president of Criterium-Cincinnati Engineers. Two of the services that we offer are Federal Housing Authority (FHA) structural inspections and the Ohio Manufactured Homes Commission (OMHC) inspections. I personally have done nearly 2000 FHA inspections and my employees and I have done over 1000 OMHC inspections. We have been doing the OMHC inspections since 2007 when the OMHC rules were enacted that requiring manufactured homes installation inspections.

The structural inspection requirements of both the FHA and OMHC are similar. And why not? They both have the same origins. While the FHA inspection focuses only on the manufactured home foundations, the OMHC inspection also includes the home's electrical system, fire alarms and weather protection.

But, I want to focus first on the FHA inspections. I have inspected a wide range of manufactured home installations of a wide range of ages, on different foundation types and in many different areas in southern Ohio and northern Kentucky. I have seen a significant difference between the installations of different age. With older installations, I have no idea what I will find because who inspected the homes and the criteria that was used was not standardized—other than homes that required FHA inspections. Since 2007, I have rarely failed homes for an FHA inspection. Why? Because of the OMHC rules.

I have also seen proof that manufactured homes are safer when installed according to the OMHC rules. The proof came when a number of homes that my employees inspected in a manufactured home park in Wilmington experienced a direct hit by an F1 tornado. NONE of the homes that met the OMHC installation rules were pushed off of their foundations despite experiencing damage to the home exterior.

This action by our Ohio representatives and endorsed by the state fire officials is misguided and just plain wrong. Manufactured homes HAVE gotten safer—MUCH safer. I cannot help believe that the fire officials have mixed homes built and installed prior to the formation of the OMHC and those built and installed afterward. I have to ask. Where are the statistics that show that homes are no more safer today than before the formation of the OMHC? State fire officials are putting blinders on our state representatives and possibly themselves by focusing attention on only fire issues of manufactured homes. The OMHC rules cover much, much more of the safety of manufactured home installations.

So, let's sum up what disbanding the OMHC will accomplish:

- The state will be breaking up a state agency that pays for itself.
- The state will be ending established inspections overseen by an agency that has made manufactured homes safer in our state.
- The state will be terminating an agency that constantly monitors and updates rules that make manufactured homes safer.
- The state will be putting the duties of an agency that has government and private industry cooperation rules into multiple parts of another agency.
- The state will be ending an agency that is striving to make manufactured home parks safer and not eyesores for their local community.

And I could detail more benefits of the OMHC, as Mr. Atkinson did in your article. So, why would our state politicians want to blow all of that up?

I think, however, that the greatest irony not stated in your article are statements by our state fire protection officials that the rules do nothing to prevent manufactured home fires. For you see, the current rules governing manufactured home installations were ultimately (and are still being) developed by a committee composed of government, trade and private industry persons under the leadership of the National Fire Protection Association. (Check that fact out here: <http://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards?mode=code&code=501&tab=about>.)

So, how exactly will breaking up the OMHC and merging it into two or more parts of the Department of Commerce save the state money? And, exactly how will this action benefit the people of Ohio. Who is fooling whom?

Matthew Klein, PE
Business Owner