

7.9.2017

Honorable Melvin Watt  
Director Federal Housing Finance Agency (FHFA)  
Eighth Floor  
400 7<sup>th</sup> Street, S.W.  
Washington, D.C. 20219

**Re: Duty to Serve Underserved Markets – Implementation Plan Evaluation**

Dear Director Watt,

We bring a unique perspective to this discussion of the Duty to Serve (DTS) by the Government Sponsored Enterprises (GSEs, Enterprises) of Fannie Mae and Freddie Mac.

We:

- are the industry's leading public- and professional-focused trade media,
- have over 2 decades experience in high-volume manufactured home retail that includes,
- management of multiple land-lease communities,
- have been involved and managed/coached/consulted the sales of thousands of manufactured homes,
- HUD Code manufactured housing industry expert consulting,
- witness the impact of public policies on consumers and professionals,
- have had thousands of personal customer encounters, plus interviews with consumers,
- and provide various professional services to the industry.

You can sum up our perspective as being pro-consumer, pro-industry and pro-free enterprise.

While my thoughts are mine and reflect the experience of our organization, they're forged through years of hand-on experience, as briefly outlined above. These views are mindful of interviews and dialogue with lenders, retailers, communities, producers, association and other professionals – and those thousands of all-important home owners and home shoppers.

As the top trade publishers, we also routinely get comments from industry professionals and the public. Many of these are off-the record, and are thus candid reflections of what people really think, as opposed to some public posturing.



**"Most men appear never to have considered what a house is, and are actually though needlessly poor all their lives because they think that they must have such a one as their neighbors have."  
- Henry David Thoreau**

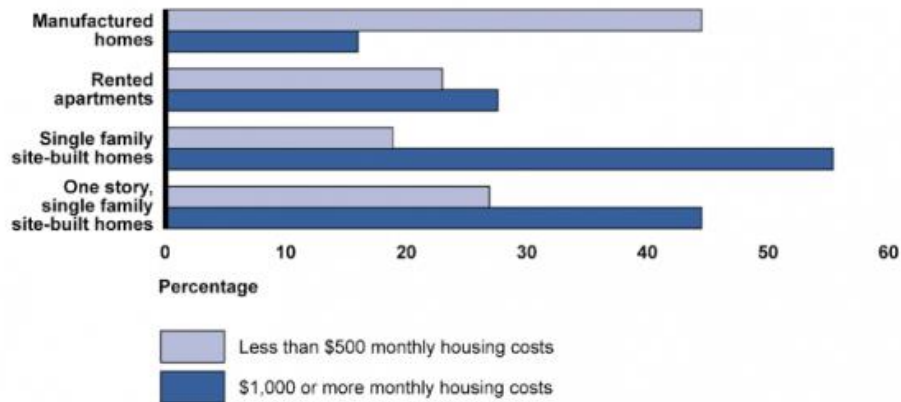


Against that backdrop, please consider the following with respect to the GSEs and their DTS.

- I) The **executive summary** is this. DTS can and should be robustly implemented in a sustainable, prudent, proven, and profitable fashion. DTS is also the law. Duty means a mandate; it's not a suggestion or request. To this point, the argument could be made that the law has been ignored. Avoiding full implementation has and continues to create an uneven playing field between conventional housing and manufactured homes. There are forces within the industry - and those outside of it - that cause this injustice to continue. This comments letter will outline those below, in no particular order of importance.

This will conclude with links to resources for learning more about the industry's realities – often through third-party research – as opposed to mere opinions. While we are pro-industry, we are also pro-truth. We believe that the facts matter. Facts, not opinions or fears, ought to be the drivers of public policy, and should drive DTS to full, robust, and successful implementation.

**Figure 10: Monthly Housing Costs for Owners of Occupied Manufactured Homes, Single Family Site-Built Homes and Apartment Renters 2011**



Source: GAO analysis of American Housing Survey data. | GAO-14-410

*From GAO report on manufactured housing, linked in resources, below.*

- 1) Over the years, my colleagues and I have worked with lenders in loss mitigation, re-marketing and other aspects of manufactured home sales and lending.



**Allen Cole**

Senior VP at oxford Bank and Trust

September 6, 2010, Allen worked with L. A. 'Tony' but at different companies

Tony "gets it" when it comes to manufactured housing. He has worked or been involved in almost all phases of the business. Best of luck to Tony in creating more awareness and understanding in this often misunderstood industry.

*Comment via LinkedIn, [click here](#) or above for more.*

- 2) We are also aware that 21st Mortgage's CEO, and MHI Chairman - Tim Williams - allegedly stated in an MHI meeting room that they had not turned over the data that the GSEs had requested, which other MH lenders stated they have provided.



**Mary McBrady**  
Executive Director Mass.  
Manufactured Housing Assn  
May 17, 2016, Mary worked with  
L. A. 'Tony' but at different  
companies

L.A. Tony is tireless in his quest to promote the HUD code factory built home industry and manufactured housing in general. Thanks for all of your outreach and on-going enthusiasm.

*Comment via LinkedIn, [click here](#) or above for more.*

3) MHI Chair Williams, per those sources, also stated why he did not turn over their 21st lending data. Williams wanted to make sure that if the GSEs got into the lending on manufactured homes, that they would take prospective buyers from **'each of the various tiers of credit tranches.'**



**Steve Reyenga**  
Director Of Business  
Development at American  
Homestar Corporation  
August 31, 2010, Steve worked  
with L. A. 'Tony' but at different  
companies

Follow and Read Tony's insights. His research will keep you informed and you will keep CURRENT with this ever changing industry. :)

*Comment via LinkedIn, [click here](#) or above for more.*

4) To rephrase that close paraphrase and/or quote by Williams above, per those sources, 21<sup>st</sup> wanted to limit their entry into the MH Chattel marketplace at a minimum. It is also safe to presume that 21<sup>st</sup> understand that their decision not to share data could be used by the GSEs as a reason not to do chattel lending at all. It should also be noted that 21<sup>st</sup> has allegedly suspended the use of FHA Title I. If so, doesn't that suggest that federal programs authorized by Congress - designed to benefit the public, retailers and communities - are being sidelined by that lender?



**Ron D'Ambra**  
National Program Manager  
at 2-10 Home Buyers  
Warranty  
December 27, 2014, Ron worked  
with L. A. 'Tony' but at different  
companies

Tony is the "Voice" of the manufactured housing industry, his knowledge and skills has propelled him as a leader and innovator for contributing to positive growth and the "go to" source for what is going on in our industry. Tony is always thorough with his skills to investigate and gather all the facts when addressing new idea's and confirming the news and current topics that are related to the manufactured housing industry. His forums are consistent with current events, informative and accurate while maintaining positive recognition of the industries perception by the both the public and private affiliates representing the manufactured housing industry. Tony has achieved both domestically and foreign recognition for his contributions and dedication to be the best of the best when reporting the industries current news and events, I call him my friend, and I refer to him as "Voice"!

*Comment via LinkedIn, [click here](#) or above for more.*

5) Yet MHI's SVP Leslie Gooch has stated publicly - and to the knowledge of most of their members - expressed that they want the GSEs to do chattel and other MH Lending. Aren't those two realities clearly contradictory?

5a) Doesn't those two realities – Gooch's claims vs. MHI Chairman Williams' authority – reflect at a minimum, a disconnect?



**Sue Frost**  
Sacramento County  
Supervisor - District 4  
May 20, 2010, Sue worked with L.  
A. 'Tony' but at different  
companies

I highly recommend Tony Kovach, Editor of MHMSM Magazine. His magazine is informative and addresses important and current issues relating to the Manufactured Home Industry. Tony is a great resource and he is wonderful to work with.

*Comment via LinkedIn, [click here](#) or above for more.*

5b) Or could it be that it reflects something else? Namely, an unspoken agenda to stop - or slow walk - the GSEs more robust entry into the manufactured home chattel marketplace? Should one consider if their involvement in this DTS process represents a conflict of interest with that of much of the industry at large?

5c) Warren Buffett's Berkshire Hathaway annual letter indicates that financing is a significant part of the profitability of manufactured homes for that company. Isn't what Williams – and by extension, MHI – doing just protecting Berkshire's corporate profits?



*In a discussion with dozens of residents at this PA manufactured home community, Kovach asked if they wanted a more level playing field on manufactured home lending. Every hand in the room shot up.*

6) That said, the GSEs could deepen their role in the MH Lending market **without MHI's blessings.**



**Doug Gorman**

Owner, Home-Mart, Inc.

August 29, 2010, Doug worked with L. A. 'Tony' but at different companies

Tony is one of the best go-to guys in our industry that I have had the pleasure of working with. He is consistently upbeat and appears to have an endless source of energy. His efforts have helped to improve our industry.

7) The above (6) says “**deepen**” because the GSEs have in the past - and still are according to some sources – doing and servicing loans in manufactured housing, both on a chattel (home only, personal property lending), plus mortgages in leaseholds, as well as lending on a fee simple basis.



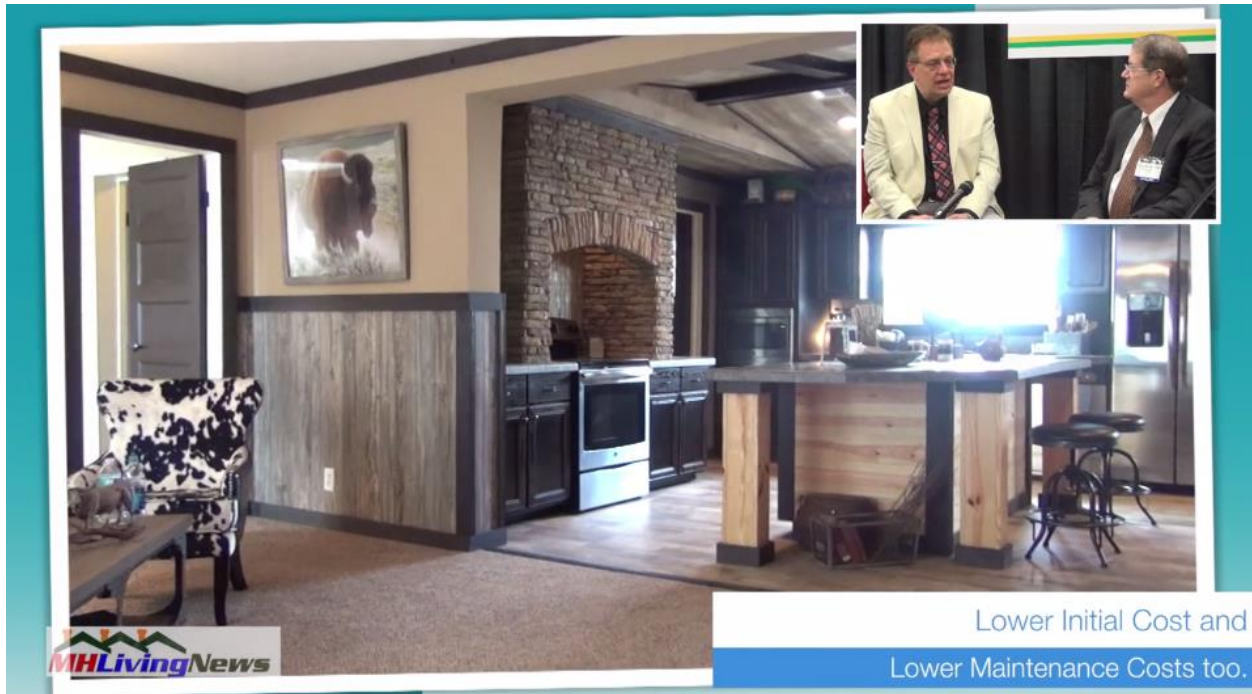
Garage Addition to Manufactured Home

MHLivingNews.com

8) The GSEs could do more mortgage lending and personal property loans in responsible and sustainable ways. No one save the 'repo man' and their colleagues - long term - would benefit from a repeat of the MH Industry's credit debacle of the 1990s and early 2000s. We as pro-Industry trade publishers and as pro-consumer and pro-business service providers, we have no desire to see the past lending mistakes in the MH industry lending be repeated. My colleagues and I believe that sustainable, prudent, profitable lending that serves the public and most professionals is the correct path.

8a) The video interview with the two lenders, linked among the resources below, ought to prove these points to be valid and sound.





*Kovach with former HUD Code Manufactured Home Program Director, Bill Matchneer. Still from a video posted in an article linked below.*

9) We also believe, as HUD Secretary Dr. Ben Carson has suggested, that education can be a useful tool to help broaden the numbers who may qualify and do so successful. Making risky loans is a bad idea, but making loans to those who go through proper education and training is a proven way, say third party reports, to work.

9a) In my own experiences, we coached customers at closing, and we had lenders tell us that our loans performed better as a result, because properly instructed otherwise 'marginal' credit customers treated the home purchase as a serious obligation.

10) At present, the playing field between manufactured housing and conventional construction is clearly unlevel.

"I DO SEE MANUFACTURED HOUSING PLAYING AN IMPORTANT ROLE IN PROVIDING AFFORDABLE HOUSING IN RURAL AREAS. I THINK IT'S IMPORTANT TO ENSURE HUD'S POLICIES PROMOTE ACCESS TO THIS VALUABLE RESOURCE."

"WE HAVE MUCH WORK TO DO IN ENHANCING EVERY ASPECT OF OUR NATION AND ENSURING THAT OUR NATION'S HOUSING NEEDS ARE MET."

- DR. BEN CARSON  
HUD SECRETARY



11) By accident – hopefully not by design - the GSEs are treating manufactured housing and their owners as second-class citizens, when compared to how conventional housing is handled.



*One of the photos from a project Kovach worked with, an upscale land-lease community setting.*

12) Given there has been some 9 years gone by since HERA 2008 and DTS was made law, the proposal by the GSEs seems tepid and inadequate to the ever-growing need for affordable housing.

13) **Part of the reason for the GSEs hesitation, per our sources, are fear of losses.** It's that fear of losses that drive part (but clearly not all) of the GSEs concerns.

14) Yet we and others know from first-hand experience that HUD Code manufactured homes that are properly sited and installed can increase, decrease, or hold its value due to much the same factors as conventional housing. See interviews, articles, and video, linked below.



15) The other factors that are slowing the GSEs, per our sources, includes, but aren't limited to:

- Relatively low volume of new HUD Code manufactured home sales,
- The complexity of navigating the industry's politics and interlocking relationships (note the MHI related discussion points, above),

- and the industry's past experiences in lending that caused major lenders to leave manufactured home lending in the late 90s and early 2000s,
- insufficient experience.

15a) But aren't these bullets interlaced, self-fulfilling prophecies? When you cut lending, you cut value. When you limit lending, sales are limited, and so on.

15b) MHVillage (MHV) claims they get some 20 million unique visits a year. If that is accurate, then that proves there is a huge interest in manufactured housing. Yet only a tiny fraction of a percent actually purchases. Lending and the issues discussed and referenced below are among the obvious reasons.

***"I know the benefits of purchasing a manufactured home because, as a millennial myself, I live in a residential style manufactured home that I purchased last year."***

***-Lindsey Bostick  
Sunshine Homes***



15c) But this MHV point is made to bely the concern among the GSEs that there is sufficient interest. The potential demand is mammoth. If one reads studies by Zillow or NAR, what buyers want reads like a description of what manufactured housing is. The solution, thus, is hiding in plain sight. It is simply not perceived that way - and the GSEs as part of their duty to serve - can influence that, see below.

16) Each of those issues - to the degree that concerns are valid - and others can be successfully addressed.

16a) For example, experience can be acquired by hiring experts, it need not be obtained through firsthand experience. That happens in industries across the spectrum, so why not manufactured homes and related lending, at the very time when the need for affordable quality housing is so great and increasing? Shouldn't public policy encourage a faster, not a slower response to a widely-acknowledged and growing crisis?

17) So, none of the reasons generally heard (e.g.; 15, above) from the GSEs to slow-walk the advance have a basis that can't be reasonably addressed, now.

17a) To rephrase, the tepid plans submitted ought to be replaced by a robust process for personal property, lease-hold mortgages, and land-home lending that can be done vigorously, profitably, and sustainably.

18) Note that past losses - including the 2008 meltdown that caused the FHFA to exist and has the GSEs in receivership - did not keep the Enterprises (GSEs) from robustly reentering the conventional housing lending space. Adjustments were made, lending returned, housing values that collapsed and once more risen. See link in the resources, below.



18a) So why is it that manufactured housing is punished almost 15 years after our MH Industry's debacle? Why has site built housing been given preferential treatment, even after historic losses?

19) Number 18 and others above raises points almost no one makes. It's a fallacy that is obvious once mentioned.



**Bob Thieman, CAE**

Executive Director at

January 18, 2012, Bob worked with L. A. 'Tony' but at different companies

Tony and his company are leading the way for manufactured housing to enter the 21st century. He and his staff have put together remarkable educational programs and marketing that are ahead of the time and benefit the industry greatly

20) The factors that causes homes to appreciate, depreciate, or hold its value are these (no particular order of importance is implied):

- demand for housing in each market,
- condition of a home,
- curb appeal of a home (plus interior appeal),
- available financing for qualified borrowers,
- marketing/re-marketing,

21) Remove or limit the lending - and what 2008 taught millions of conventional housing owners again - is that values drop in the absence of lending.



*One of thousands of articles published by MHLivingNews.com and MHProNews.com. See this story and video, linked among the resoruces, below.*

22) Remove or limit remarketing, and you demand is limited which impacts values, but that limitation may be artificial depressed. Widespread knowledge of the facts, boost demand. See links, as resources at the end.

23) When there is:

- widespread ignorance of the product,
- when the industry's national umbrella organization uses questionable advertorials, Facebook, and tweets, and calls that **'image building,'**
- when MHI fails to respond effectively or at all to PBS, NPR, Seattle Times or and several other misleading or demonstrably false reports,
- when MHI has contradictory information to consumers and the public on its own website, including on matters relating to lending,

naturally, there will be an ongoing skepticism from the market, investors, lenders, and media.



*Still from video and article, linked below. This story debunks some NIMBY related concerns.*

23a) But proper exposure corrects those errors, as a video interview with lenders properly exposed to manufactured homes linked below demonstrates.

24) But the GSEs are uniquely positioned to be a part of the solution to those problems. Furthermore, the GSEs are de facto required by HERA 2008 and DTS to be a part of that solution. **Duty, after all, is a mandate, not a suggestion.**

"IF CONGRESS HAD MEANT THE "DUTY TO SERVE" TO BE OPTIONAL, IT WOULD NOT HAVE CALLED IT A "DUTY." THE DICTIONARY DEFINITION OF A "DUTY" HAS – AT ITS CORE – A MANDATORY RESPONSIBILITY."

M. MARK WEISS  
PRESIDENT, CEO - MHARR



24a) How that mandate is fulfilled, there is wide latitude. Part of how that mandate should be fulfilled is by helping correct the errors caused by ignorance, and policies inside and outside of manufactured housing, as is outlined herein and the resources linked below. That process, properly done, is profitable.

25) MHI allegedly postures as being *part of the solution*, but doesn't the evidence rather reflect that *they a key part of the problem*? Many in the industry believe so – including MHI members - as our interviews and articles demonstrate.

26) Since the GSEs are reluctant, aren't they more likely to go with the actual MHI agenda (as exemplified by Tim Williams/Chair/21<sup>st</sup>) as opposed to their stated position?

26a) Given the stated GSE reluctance, aren't the Enterprises more likely to side with that de facto MHI position, than with those far more numerous other voices in the industry that are encouraging the GSEs to sustainably enter the marketplace?



*While manufactured home sales are growing at double digits, they could be doubling or more every year, for several years. This per interviews and facts from industry members and client companies.*

26b) Doesn't the word "Duty" still mean what the dictionary says?

27) MHI has been accused of slow-walking the industry's growth. If so, why? Isn't one answer suggested by Sam Zell and MHI/NCC Jenny Hodge, who explained the factors that cause consolidation of this or any industry?

27a) Doesn't the failure of the GSEs to robustly serve manufactured housing only fuel – even if indirectly - that process of consolidation? Please see links in the resource section, below.

28) If such concerns are accurate and logical, then there are a number of small- to mid-sized companies that are feeding the hand that bites them. But more to the point with respect to DTS and manufactured housing, the GSEs "Duty" – The Mandate – could be a key part of the solution to the various issues that have dogged the industry for decades.



29) The GSEs ought to approach the market with a fresh, global perspective. There are several actions/inactions that artificially limits the marketplace, as has been noted.

30) The GSEs need but structure a plan that ignores MHI alleged machinations and manipulations of the marketplace. The Enterprises should focus instead on what they know, and augment that with acquired knowledge cost-effectively obtained via experts.

- The HUD Code product today is more necessary than ever,
- It's good quality for the dollar,
- The 2014 GAO study demonstrates it is most housing for the dollar in the U.S.,
- What perceived limitations exist can all be successfully addressed,
- and the GSEs are required by law to do so – as needed – as part of their Duty to Serve.

30a) Housing is a trillion-dollar a year industry in the U.S. If you include remodeling, etc, that number jumps far higher. The potential for manufactured housing – currently hovering over \$5 billion, using Census Bureau shipment and pricing data – to increase its impact on housing is huge, and the GSEs and the secondary market would benefit and profit from that growth.

30b) Because those secondary market lenders and the GSEs are also taxpayers, there is wisdom for most involved to fuel the more cost-effective solution.

#### RESULTS

- + 30.6% of the people in the post-campaign survey, admitted that the campaign had possibly or definitely influenced their thoughts about mobile/manufactured homes.
- + 21% increase in those people that believe that there should be no restrictions on where manufactured homes are placed (zoning).
- + 29% increase in those that agreed that manufactured homes are well constructed.
- + 34% increase in those that agreed that manufactured homes are a good investment.
- + 30% increase in those people who now say that they would probably or definitely consider a manufactured home for the next home into which they move.
- + Zoning and other legislation became much more favorable.

30c) An unspoken – but very real concern – is that if manufactured housing takes off, it will harm site built housing values. Yet, the HUD PD&R, linked below, demonstrates that this is not a valid anxiety. Another article, also in the links below, demonstrates a more recent third-party study that reflects manufactured homes does appreciate, and that there is no harm to other housing value.

**31) Make the law work.** That is the nature of fulfilling one's duty. Everything else is a dodge, deflection, distraction or otherwise ducking the mandate. That harms millions in manufactured housing, and harms millions more who could benefit from manufactured homes.

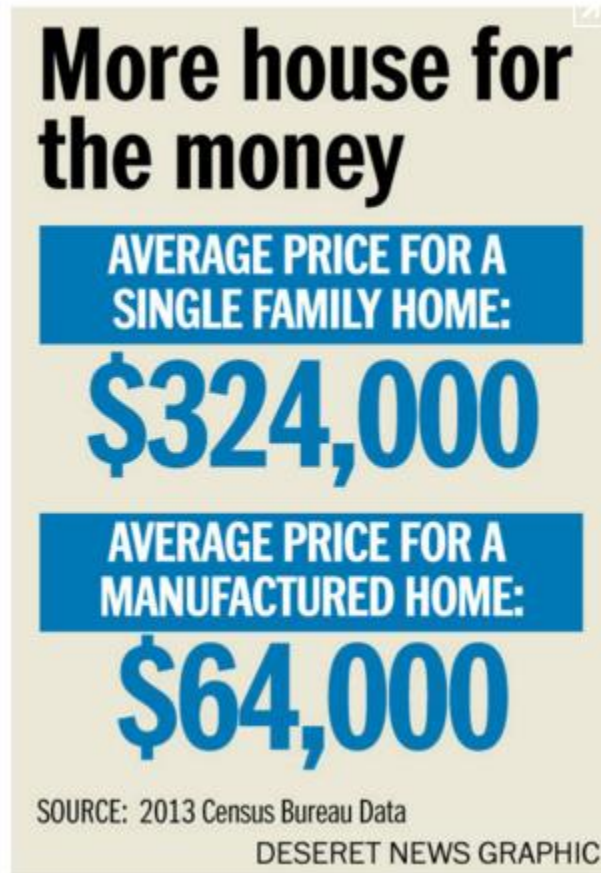
31a) Furthermore as noted, it is good public policy – again, see resource links below – to save the taxpayers billions in subsidies, by allowing the marketplace to work in providing home ownership on an equal footing basis between factory-built and on-site constructed housing.

31b) As Dr. Carson has noted several times, owners have a net worth of some \$200,000 on average, while renters have a net worth of around \$5000 average. It is good public policy to encourage responsible ownership, which is what DTS is supposed to accomplish.

**32) The Trump Administration has said it will be in the law enforcement and promise keeping business.** FHFA ought to follow that lead, and hold the GSEs to their mandate.



33) Let the GSEs work within and without the industry in ways that allow the Enterprises - which clearly have the clout with the secondary market - to plow through the political, educational, NIMBY, BANANA, and other hurdles.



*Graphic from a mainstream media interview that featured Kovach and a pair of others he recommended to the reporter.*

34) It's the Wizard of Oz, in manufactured housing land. Let FHFA and the GSEs pull back the curtain. The smoke and mirrors fears will fade. The public, public officials, and secondary markets will respond. Renters turned home owners will benefit. Lenders will profit, as will private enterprise.



[Mainstream media article](#) featuring the work of the Kovach family to promote a better understanding of manufactured homes and the MHLifeStyle.

35) Cleary, implementing the DTS as outlined herein will yield victories for most everyone in the mix. Taxpayers will save billions over time in subsidized housing costs. Those trapped in living in rental housing – see the Donald Tye comments below – will benefit from improved quality of life. As Dr. Carson has suggested, how a person lives also impact their health and habits. In short, there are ripple effects from the correct tact embraced with respect to DTS and modern manufactured homes.

35a) In an upcoming article, Donald Tye will also state the benefit to the local taxing authority when more manufactured homes are sold.

36) The GAO 2014 study - a download from among the links below, provides – along with the other resources third-party studies - that demonstrates that most of the thinking about manufactured housing is grounded in fables, not reality. Make the playing field level. Enforce the law. The law will work, millions, and the federally subsidized HUD housing system will likewise benefit.



***"In California year-to-date 06/2015...74% of new manufactured homes were sold for cash! Can we really provide affordable housing if only families with cash can purchase them? Its time for common sense!"*** – Jess Maxcy, President, CMHI. Quote from *The Hill Congressional Blog*. photo credit = *MHProNews.com*.

Manufactured housing is America's greatest untold story. When an individual or couple sit down with pencil and paper and figure out what a good deal MH is, invariably they shake their heads and say "why hasn't anyone told me this before." Don't let this secret pass you by.



Ross Kinzler  
Executive Director  
Wisconsin Housing Alliance

*Two of the dozens of comments posted on a mainstream media Op-Ed published by Kovach designed to shed light on MH lending realities.*

Kindly see the recommendations of our work, along with our work itself which will shed light on the wisdom of implanting these recommendations. Not to be missed is the video comments linked below Dick Ernst – MHI's Finance Committee Chair – strong statements of support of our belief in and work on behalf of manufactured homes. That should help those who want clarity on the value of these comments to see that this isn't just wishful thinking.

The above can and should be done, given the will and desire to do so.

*Respectfully Submitted,*

L. A. 'Tony' Kovach

<https://www.linkedin.com/in/latonykovach>

MHLivingNews.com

MHProNews.com

[LATonyKovach.com](http://LATonyKovach.com) – Recommendations by industry professionals.

(PS: please pardon any typos, our editor is off, and our time is very limited.)

+++

***Whether you think you can or whether you think you can't, you're right.*** - Henry Ford



*Kovach is a popular presenter in the MH Industry.*

**Resources** – In no particular order of importance. We'd encourage those studying this response to view several of the video interview with consumers, along with more professional interviews, than those samples shown below.

<https://www.manufacturedhomelivingnews.com/triad-financial-services-introduces-superior-choice-credit-union-to-manufactured-homes-loans-video/>

<http://www.MHProNews.com/blogs/daily-business-news/an-elephant-ass-understanding-gses-duty-to-serve-manufactured-home-lending/>

<http://www.MHProNews.com/blogs/daily-business-news/meet-donald-tye-the-flashback-fast-forward-face-of-factory-built-homes/>

<http://www.MHProNews.com/blogs/daily-business-news/frank-rolfe-blasts-mhi-for-poor-media-engagement-industry-reactions/>

<https://www.manufacturedhomelivingnews.com/multi-billion-dollar-bombshell-hud-affordable-housing-solution-ignored/>

<http://www.MHProNews.com/blogs/daily-business-news/marty-lavin-lashes-the-manufactured-housing-institutes-mhi-latest-initiative/>

<https://www.manufacturedhomelivingnews.com/rapid-acceptance-of-energy-star-rated-residential-style-manufactured-homes-proves-need-value-as-affordable-housing-solution/>

<http://www.MHProNews.com/blogs/daily-business-news/els-sam-zell-compliance-costs-destroys-smaller-businesses-consolidation/>

<http://www.MHProNews.com/blogs/daily-business-news/jenny-hodge-national-community-council-public-time-bomb-deployed-on-manufactured-housing-institute-prominent-mhi-lender/>

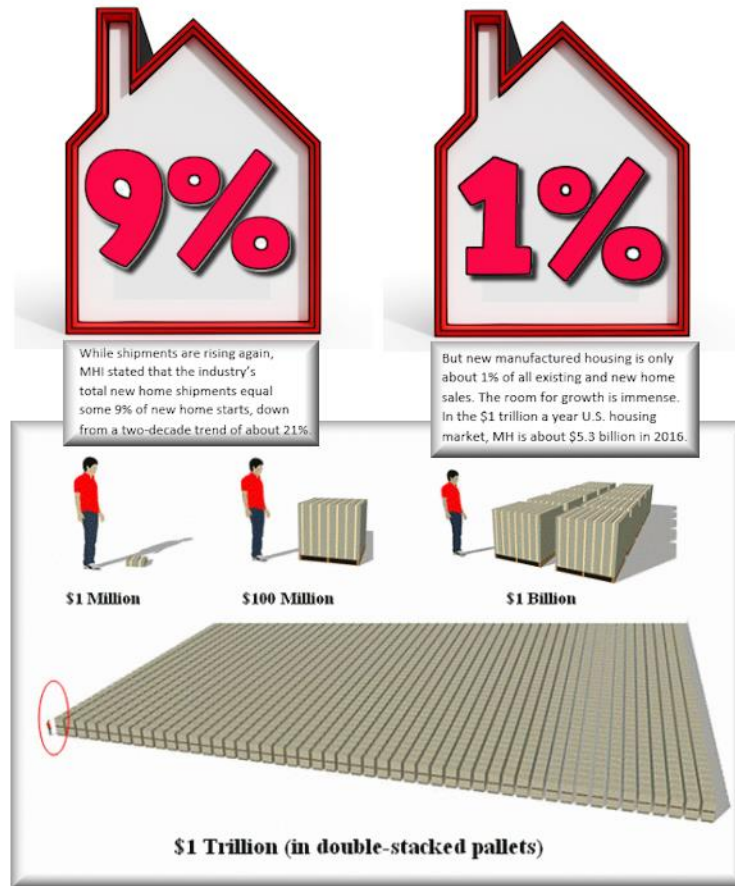
<http://www.MHProNews.com/blogs/daily-business-news/existing-manufactured-homes-rising-in-value/>

<http://www.theledger.com/opinion/20170629/letter-solving-home-affordability-problem>



<http://www.MHProNews.com/industry-news/industry-in-focus/climate-change-tornadoes-and-mobile-homes-dangerous-oversights-mark-skidmore-admits-michigan-state-univ-study-s-omissions-revealing-analysis-report>

<http://www.MHProNews.com/industry-news/industry-in-focus/a-executive-summary-400-words-manufactured-housing-industry-obstacles-and-billions-in-opportunities>



Housing percent and collage credits, MHProNews.com. 1Trillion dollar graphic credit, blah, blah, blah.

<https://www.manufacturedhomelivingnews.com/federal-data-spotlights-manufactured-home-industry-quality-regulatory-questions/>

<https://www.manufacturedhomelivingnews.com/manufactured-home-owners-satisfaction-survey-redux/>

<https://www.manufacturedhomelivingnews.com/nar-millennials-want-quality-affordable-homes-to-buy-in-2017/>

<https://www.manufacturedhomelivingnews.com/home-sweet-home-assistant-mayor-wants-to-end-housing-choice-stigma/>

<https://www.manufacturedhomelivingnews.com/the-solution-to-the-affordable-housing-crisis-is-hiding-in-plain-sight/>

<https://www.manufacturedhomelivingnews.com/pride-and-prejudice-the-truth-about-manufactured-home-communities-and-crime/>

<https://www.manufacturedhomelivingnews.com/avoidable-tragedies-mobile-home-fires-vs-manufactured-home-and-conventional-housing/>

<https://www.manufacturedhomelivingnews.com/bloomberg-housingwire-realtor-and-fox-all-suggest-manufactured-homes-as-important-solution-for-affordable-housing-in-america/>



<https://www.manufacturedhomelivingnews.com/correcting-the-record-on-housing-affordability-manufactured-home-shoppers-mhi/>

<https://www.manufacturedhomelivingnews.com/art-linkletter-and-manufactured-housing-today/>

The future of affordable quality living is hiding in plain sight. The front-line people engaged with manufactured homes by the GSEs who have taken the time to look at the product know it.

Electronically submitted.

<https://www.fhfa.gov/PolicyProgramsResearch/Programs/Pages/DTSDraftUnderservedMarketsPlansForm.aspx>

[MProNews.com](http://MProNews.com) | [MHLivingNews.com](http://MHLivingNews.com)