



AFFH Comments Letter Provided Via Electronic Submission

HUD Secretary Ben Carson, M.D.
Office of General Counsel
Rules Docket Clerk
U.S. Department of Housing and Urban Development (HUD)
Room 10276
451 Seventh Street, S.W.
Washington, D.C. 20410-0001

Re: Advance Notice of Proposed Rulemaking
Affirmatively Furthering Fair Housing (AFFH): Streamlining and
Enhancements, Docket No. FR-6123-A-01; RIN 2529-AA97

Dear Secretary Ben Carson, M.D.
HUD General Counsel and
All Other HUD Officials Involved in the AFFH Process,

Executive Summary:

It's the truth, hiding in plain sight.

The proper implementation of existing laws could rapidly accomplish several things relevant to the Affirmatively Furthering Fair Housing (AFFH) discussion. They would include, but not be limited to, the following:

- Taxpayer dollars could be saved,
- more local, state and federal tax revenues would be generated,
- the personal net worth (wealth) of millions of Americans could be advanced over time,
- Those NIMBYite voices could be won over to YIMBY via practical, evidence-based educational efforts.

The proposal that follows would use principles already embraced and advocated by President Donald J. Trump, Vice President Mike Pence, HUD Secretary Ben Carson, M.D., and others. But the proposal itself is unique and simple, as you will see.

For clarity for any readers who don't already know, NIMBY is an acronym that means "not in my back yard." YIMBY is its reverse, "yes, in my back yard." The two poles reveal the tension between those who

want to block all development near them vs. those who are open to building housing in a more robust fashion.

The solution for the [affordable housing crisis and for an effective path to properly implement AFFH begin](#) at a surprisingly similar nexus.



HOMEOWNERS INSURANCE

Fear, Manufactured Homes and a Solution to the Affordable Housing Crisis

Fear affects decision-making every day. But often, "fear" is an acronym for "false evidence appearing real." Our research indicates that the solution to the affordable housing crisis is hiding in sight, but fear and prejudice have kept it from being widely embraced.

- JUNE 7, 2018



The [video interview](#) on the page below could be viewed before and/or after reading the prologue that follows, because the two are bookends and are interconnected.



Those new to this approach should consider reading the material, its linked references – such as those items linked from posted image, above and below - and then re-reading this comments document.

AFFH Comments Outline

Let me provide an outline for how the above cited request for comments will be presented. As part of these comments, please consider all linked items as references and/or as an integrated part of my submission. Kindly note that graphics and images may include links.

There is obviously no specific need for a member of the public to have any expert qualifications to address an issue open for public comment. That applies to this Docket No. FR-6123-A-01; RIN 2529-AA97

That noted, this will be a multiple part expert response. The comments letter will follow the following format.

I) A Prologue: that outlines a real-world case relevant to the AFFH discussion.

II) What Others Say about myself and our operation's work, plus insights on my experiences that has drawn positive third-party recognition of our team's work. As an expert, that is not to imply that I know it all, no one does. But the breadth of recognition and experience will make it clear that I understand the issues related to AFFH, NIMBY vs YIMBY and the role that existing law, that manufactured homes in particular - or factory-built housing more broadly - can, should, and ought to play in this much needed process.

III) Why AFFH Must Be Considered from a Broader Scope than what AFFH advocates may normally construe. A broader scope should be considered **due to the Affordable Housing Crisis**, and the fact that trillions of dollars have been spent on federal programs over the years, some of which are directly targeting housing, others more broadly poverty or other social safety net focused. Yet, the need for affordable housing remains, or is arguably growing. That suggests a need to approach the issue from a fresh perspective, that learns the often painful lessons of the past. Failure to deal with AFFH in a proper way harms almost everyone. There are:

- the economic costs to millions of individuals,
- lost revenues to states, localities, and the federal government,
- plus tremendous sums of lost GDP to the U.S. economy.
- There are also specific harms done to the Manufactured Home Industry,
- current and would be manufactured home owners,
- and all those who aspire to having their part of the American Dream.
- That said, it must be noted that the reason that change has been resisted is because various interest groups believe that the status quo benefits themselves. While that may be true in a relatively small number of cases, in fact, with clear eyes, one discovers that almost everyone in the mix could benefit from this proposal.
- **Why these views as a long-time manufactured home (MH) expert** – informed by the insights gained from numerous colleagues over the course of many years – could prove to be valuable to HUD, the Trump Administration, and all Americans. The outline to this point already suggests as much. Let me note that I consider myself to be pro-business, pro manufactured

home owner/residents, and pro-consumer. Opening minds would open opportunities for almost everyone.

- **Why a broad view of this issue – in the light of demonstrable evidence - could help melt the barriers rapidly. The best part may be that the following is based upon the enforcement of existing laws.** So in the Trump Administration, which has often said words to the effect that '**we are in the law enforcement business**,' this could be a breath of fresh air.
- **Perhaps most important of all, this would save taxpayers money over time, while increasing revenues to local, state, and the A federal government.**

IV) **Closing Summary, Thoughts, Related Recommendations, and Next Steps**

Clint Eastwood once said in a movie role, that **a man should know and acknowledge his own limitations**. With that in mind, let me note that we stay extremely busy. These comments are being generated by myself personally on Sunday afternoon, and part of Monday, the day these comments are due. So please excuse any typographical errors. Thank you for that consideration.

With that outline in mind, let's dive into the prologue.



The parents and brother of Donald Tye, Jr. Their business was called 'Able and Able.'

I) **Prologue:**

Let's begin with a factual account about two families in a metropolitan area.

The Rev. Donald Tye, Jr. told us about his parents, who began placing affordable factory-built homes on infill lots in a Cincinnati metro neighborhood. He began with conventional construction, but that proved to be too costly for many prospective buyers. So, Tye Junior's father turned to factory-built homes, constructed in the early 1970s, prior to the HUD Code.

Those homes were installed in a neighborhood that included conventional housing.



Those factory-built homes reportedly sold well. They appreciated in value, side-by-side with conventional housing. There was federally guaranteed financing available that made the homes easy to buy for those seeking their part of the American Dream of home ownership. Tye says they are worth many times more than when they were first sold, per data from Zillow.

Select quotes from businessman and actively retired minister, Donald Tye, Jr.



"As we think about housing in today's world, the most important aspect should start with affordability. When home ownership is affordable, it has ancillary benefits," said actively retired businessman and minister, Donald Tye, Jr.

"Ownership builds character, competence and integrity," Tye said in soft yet potent tones.

"One thing that is completely missed by politicians and prejudice towards

manufactured housing is the tax benefit," Rev Tye said.

"It's just as wrong to use the N-Word to describe a black as it is to use the T-Word to describe a manufactured home," Tye stated matter-of-factly.

"The homes that will be constructed on a tract of land in Edmond OK are not mobile homes. They are manufactured homes," Tye explained. **"The people that will purchase those homes will pay taxes. They will involve themselves in the community. Those home owners will be a benefit to that community."**

Tye and his family lived the days of the emerging civil rights movement. **"Someone needs to step out and be an advocate for people living in manufactured housing. Because this to me is strikingly reminiscent of black people moving into areas, and those who were already living there would say, "there goes the neighborhood." This is shameful."**

Tye added, **"Someone needs to do something about it. Someone has to stand up, and be an advocate for the people who own or want to buy a manufactured home. Someone in the manufactured home industry needs to stand up and organize on behalf of millions of our fellow Americans, regardless of their background."**

Rev. Tye told *MHProNews* that the buyers, seller - essentially everyone in the mix - were benefiting. That was true until the 'city fathers' - local politicians - shut the blossoming private-sector effort down. Once the powers-that-be decided against them, no more of those factory-built homes could be placed. Tye touches upon that in a video interview that we did with him, that will be posted soon at the link below. Kindly circle back to it, if that is not yet live when you check the following link.

<https://www.manufacturedhomelivingnews.com/affirmatively-furthering-fair-housing-a-novel-yet-proven-solution-to-the-affordable-housing-crisis-that-will-create-opportunities-based-upon-existing-laws>

Tye's parents and those who bought those homes - including Tye himself - saved on housing costs. That savings allowed he and his wife to pay off that factory-built home years early.

Owning that home outright in turn allowed Tye and his wife - a school teacher - to open a business, put their children into good schools, and help their offspring get a good education. Tye later invested in other real estate. Having worked with his parents, Tye saw both conventional construction and factory-built construction. He inspected housing that he was considering investing in. Tye said some of the site-built housing he examined wasn't as well built as those factory-built home he owned, and that his father sold.

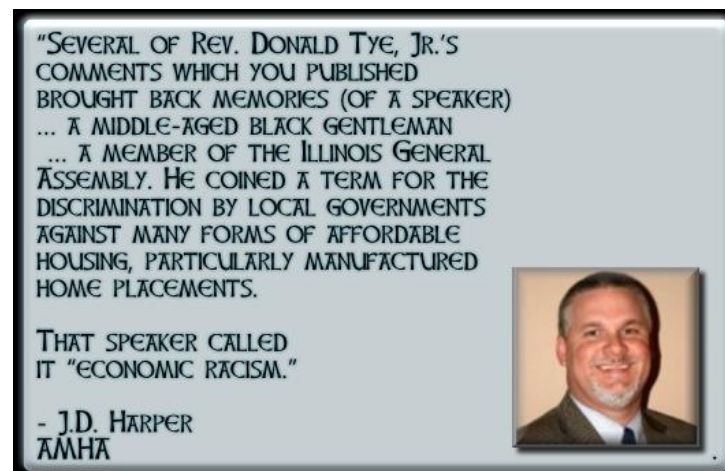
My wife and I had met the Tyes quite by chance at a dentist's office. We began to talk, and we hit it off. My wife and I learned some of the above about their experiences during a meal we subsequently had with Donald. We initially had no idea that he and his wife owned a factory-built home, or other kinds of property. Our involvement was social.

But during a breakfast, Donald was conversationally sharing his concerns that people working for \$15 an hour couldn't buy a new conventional house. But he said they could buy a factory-built - today's manufactured home - much like his parents, his wife's family, and later he and his wife had all done.

Donald gave us his okay to share his story on *MHProNews* and *MHLivingNews*. We subsequently sat with him, and did the video interview referenced above. We said at the time, the Tye family was a living example of all the research and writing that we've done for years in advocating for a broader use of modern manufactured homes, including in urban or suburban environments.

Don's story drew industry-wide attention, and some potent comments, like those linked below. These relate to the Manufactured Housing Improvement Act of 2000, discrimination against manufactured housing, and are thus relevant to this discussion of AFFH.

<http://www.MHProNews.com/blogs/industryvoices/harper-thank-you-rev-donald-tye-fighting-for-enhanced-preemption-of-manufactured-homes/>



Here are some subsequent comments by Tye himself.



"...I have said before that home ownership is the quickest way to build wealth..."

"Manufactured housing could cure most of the ills we have in this country as it pertains to the housing shortage."

Why then is it not being utilized as it could be?"

– Rev. Donald Tye, Jr.



<http://www.MHProNews.com/blogs/industryvoices/manufactured-homes-access-equity-a-key-cure-for-americas-housing-shortages-wealth-building-says-activist-donald-tye-jr/>

In the wake of the troubling events in Charlottesville last year, Rev. Tye and I agreed to do some comments about discrimination and how a just society ought to function, which also bears consideration in this AFFH discussion. That article is linked below. It would be my hunch that HUD Secretary Ben Carson, M.D. – among many others - would find these of interest.

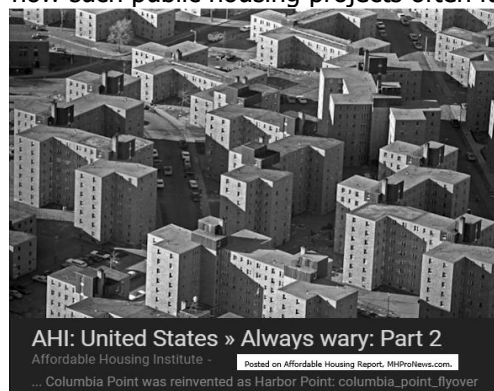
<https://www.manufacturedhomelivingnews.com/seek-first-a-post-charlottesville-message-of-healing-and-principles-for-america/>

Why? Because Secretary Carson said several times last year (2017) that the average home owner has a \$200,000 net worth, while the average renter has a \$5,000 net worth.

There are studies done by third-party researchers that debunk the kind of fallacies that people have about factory-built, or more specifically, HUD Code manufactured homes.

But before we leave the story of the Tye family behind for now, let me draw your attention to the pull quotes and illustrations from Donald.

Rev. Tye excoriated **"housing projects"** that **"warehouse"** people **"like cattle."** He said a far better option for the vast majority would be the broad use of manufactured homes. Tye specifically cited the project below as an example of how such public housing projects often failed and had huge costs.



Manufactured Housing – Regulatory, Other Roadblocks and Potential Solutions, Up for Growth Research, plus Urban Institute Report Revisited

April 17th, 2018 soheyla



Please let me also note again that the link above that will have a video with Donald Tye, Jr. added. Donald's comments should be considered as a reference for my AFFH comments. In fact, as noted above, all of the hot links – including the linked and downloads from that content - should be considered as part of these AFFH comments. Doing so will paint a rich picture, based upon reams of research by others, as referenced and analyzed by this writer and/or by our trade media team.

Then let me draw your attention to a quote from my wife, Soheyla. Like you, Dr. Carson, my wife is an MD. Life circumstances – health challenges that began before the birth of our son, Tamas – forced her to set her career aside, to care for him full time for several years. Due to circumstances, she shifted her career focus and worked with me on several levels, while she simultaneously cared for our son. Like myself, Soheyla grew up in housing that used conventional, on site construction. But we later lived as a family in several manufactured homes and communities over the course of many years.

So, we have a broad set of experiences that makes my comments here relevant to the discussion of AFFH. With that backdrop, here is something potent that my wife said.

Nothing is changed until it is challenged. The status quo needs to be challenged.



Soheyla, left, Tony, right
their son, Tamas Kovach,
near Deadwood, SD.

**"Nothing is
changed
until it is
challenged."**

- Soheyla Kovach



Soheyla Kovach, right,
Rev. Don Tye, Jr. center,
Tamas Kovach, left.
In Lakeland, FL.

To wrap up this prologue, please let me emphasize anew that all linked items are to be considered as part of my submission. Notice that graphics will often be hot-linked to an article, documents, images or that may contain videos. Related references linked from those linked articles are also part of this submission.

II. Professional “Street Cred,” Experience Yields Expert Status – Introduction

Let’s begin with some facts combined with what others have said about our operation and myself.

My wife Soheyla S. D. Kovach and I are the managing members of LifeStyle Factory Homes, LLC. While I may cite or quote others, **these are my comments**. As a serious writer, when I cite someone, it is always with the goal of accurately portraying that person’s thoughts on that topic. That said, you will notice several items linked on our websites will have Soheyla’s byline.

What is asserted is that this writer is informed about the industry’s macro-picture, along with numerous granular details.

On [MHProNews](#) alone, we’ve published some 20,000+ articles about the manufactured home (MH) industry, and/or other related aspects of housing, and factory-built housing. Thousands of those articles were written by others. We – my wife and I - touched virtually every article.

20,000 plus articles over a mere 9 years, that’s a lot of third-party industry insight. We review and fact-check reports from within the industry, and from outside experts such as the National Association of Realtors™ (NAR), the National Association of Home Builders™ (NAHB), or others too. That gives us a unique and powerful macro-perspective.

We’ve also worked with and get input from a full-range of industry sources, including professionals, public officials, advocates, nonprofits, consumers, and manufactured home owners.

Interspersed within these comments will be graphics and evidence that reflect what others have publicly said about our pro-industry, pro-consumer work.

The first one below is from the late Howard Walker, who served community giant Equity LifeStyle Properties (ELS), and the Manufactured Housing Institute (MHI) Executive Committee for years.



“The emergence of Tony Kovach’s group of publications has brought a new standard of professionalism to the industry. The thorough and unbiased reporting fills the vacuum that has existed for too long. It’s been refreshing to have these communications serving the manufactured housing industry, and here’s to their continued success.”

- Howard Walker, JD,
Vice-Chairman of Equity LifeStyle Properties (ELS)
Manufactured Housing Institute Executive Committee
Member



What we don’t know on a first-hand, granulated level, we can individually or collectively absorb rapidly. That’s possible precisely because of decades of practical experiences in manufactured housing. We strive to speak about what we know, focusing on evidence, history, ‘following the money,’ and reason.



"MHProNews.com and MHLivingNews.com are both good communications resources for the Manufactured Housing Industry. I and many others at 21st Mortgage and at MHI logon to see the latest news, interviews, debates, videos, opinions and reports they publish. Having a trade publisher that presents thoughtful, respectful commentary independent of any association's perspective – as important as an association's view can be – can be a big asset to advancing the MH Industry's cause. Let me explain why..." - Tim Williams, 21st Mortgage Corp, then MHI Chairman.

Part of longer message for publication.



I've been doing research and writing since high school. I've won awards and recognition in high school and at the university level as a history major, earned a journalism scholarship, and pursued a minor in business. For example, I won the Lottinville Award in history – the first time ever up to that point in time that recognition was won by a freshman at the University of Oklahoma (OU). I had a 4.0 in business, a 3.89 in history – on a 4.0 scale - and was on the Dean's list at OU. So while this tome won't win an award for style, it is replete with insights relevant to AFFH and the affordable housing crisis.



*Gus Rodriguez, Tejas Homes,
Conroe, TX*

"Dear Tony and Soheyla,

Thank you for your great reporting on our industry and the challenges we face as independent retailers.

There is no greater resource that speaks to the issues and opportunities than your publications.

We are glad you spotlight the key issues we need to address to succeed.

"Too bad not enough fellow retailers are planning accordingly." Thank you both." – Gus Rodriguez.

Later after university, I worked in business, sales, and management for years, which eventually led me into the manufactured home industry.



L. A. 'Tony' Kovach

<http://MHLivingNews.com> <http://MHProNews.com>

Sales · 99+



Endorsed by Lorrie White and 22 others who are highly skilled at this

Marketing · 99+



Endorsed by Scott Stroud and 6 others who are highly skilled at this

Management · 99+



Endorsed by ART ANGELO and 4 others who are highly skilled at this

The kudos are considered as reflective of our work in a variety of professional areas - including, but not limited to - the most read manufactured housing trade publication. Our readers represent companies, individuals, and experts from all sized operations. There has been over 1,000 mostly unsolicited endorsements, plus scores of recommendations via LinkedIn and/or by letter, video, etc.

My experiences in manufactured homes began in sales. I personally met hundreds of affordable housing seekers, often monthly, for many years on end. I heard their stories. To properly serve them, I had to understand their economic and other circumstances.

That was followed by a rapid promotion to managing several retail sales centers for different companies. I met the customers of my team members, plus still had customers of my own.

Later, I became an owner/operating my own retail sales center with a team that developed a reputation for good service to providers and customers. Once more, dozens weekly, often hundreds of customers a month, were met. How many housing researchers have that level of first-hand, practical engagement?



"I enjoy receiving *MHProNews* and as I have told you before – everyone I know in MH reads your pub. Continue on forever with this great news worthy service."

- [Barry Cole](#)

past Chairman of the RV/MH Hall of Fame
RV MH Hall of Fame inductee

That manufactured home retail center I owned was positively recognized by third-party trade media, and others in the industry.

I appreciate being able to get all my MH news in one place, and especially on-line on my iPad as I am away from the office so often. Our industry is lucky to have such extensive coverage and I value the thoughtful coverage on a wide range of topics that *MHProNews* provides its readers.



Don Glisson, Jr., CEO
Triad Financial Services, Inc.
4336 Pablo Oaks Court
Jacksonville, FL 32224

Tony, congratulations to you and your team on this significant milestone and much appreciation for the valuable (and often thankless) job that you do. You have truly become the preeminent news source for the manufactured housing industry and I wish you many more years of success.



Darren Krolewski
Executive Vice President, Marketing and Business Development
[Datacomp/MHVillage/JLT](#)

That manufactured home retail center was sold after a few years at a profit.

Afterwards, my career led to consulting and writing as my ongoing involvement in manufactured housing. But I also did stints of some 3 years in the RV industry, plus some 2 years in trade show marketing, believing those industries would benefit my understanding of concepts needed or useful in manufactured housing. Those RV and trade show insight were incorporated into my work in the manufactured housing industry.

McAnuff said, "Thanks for the great information you put out in the industry. Big fans! Please feel free to share my thoughts about your work as a quote!"

McAnuff elaborated. "We have previously shared your information and articles with live links and credits back to you in our MHP Weekly and our news blog."



Like any consultant, years of experience generates practical insights. That was put to work for my clients as a contract service provider. In the last 9 years, beyond consulting, we've been the runaway number 1 manufactured housing industry trade publisher. My work – with that of my colleagues - has earned several awards and recognitions over the years.



At the front of the room by the screen is L. A. "Tony" Kovach, presenting on, How to Dominate Your Local Housing Market, "**I thoroughly enjoyed your program. It was on target and had the attendees fully involved. I'm looking forward to hearing you speak again in the future!**"
– said Ken Corbin.

Ken Corbin, a competitor, provided the comment for publication.
Video comments are found on an article posted on a corporate press release for a client at the link found by clicking on this image.

Our privately-owned operation has worked directly with numerous producers of HUD Code manufactured homes. I've been in various HUD Code manufactured home production centers (factories) on several occasions, including, but not limited to, doing video interviews with manufactured home producers and professionals. Visits to factories began in the 1980s and periodically continued into recent years.

I've video interviewed the prior director of the HUD Code manufactured housing program, [widely considered as the best interview of its kind](#). Please see that video interview, as it sheds tremendous expert insights on why the HUD Code for manufactured housing has performed so well.

I've sold to and worked with thousands of manufactured home customers. We sold a lot of homes, using a philosophy of **'treating others as you'd want to be treated.'** I wanted customers that were happy, so that they would send us their friends, colleagues, and family members. We did what we promised. So, as a result of treating customers properly, I'm proud to say that in a litigious age, I've never had a single attorney's letter, much less a lawsuit from a firm on behalf of any retail consumer.

Service issues were handled as they arose.

That said, while those who did the work with me are proud of the service provided to our customers, third party research reveals something that's surprising to many. Satisfaction with the manufactured home lifestyle is general high. Mainstream media often focuses on problems, using an 'if it bleeds, it leads' approach. But the research demonstrates that manufactured home owners enjoy their homes.

Manufactured Home Owners – Satisfaction Survey Redux

Comments Off on Manufactured Home Owners – Satisfaction Survey Redux



affordable home. ...

According to a study by Southeast Research, a Professional Researcher Certified operation, 97 percent of the owners of new manufactured homes described their home as attractive. And 45 percent of those buyers could have purchased a conventional, site-built house, but decided to buy a manufactured home instead. That's good news for those shopping for a quality, greener and

For years, Foremost was a top insurer of HUD Code manufactured homes. As a disclosure, that firm is one of those in financial service that I did professional work for, but it did not include the research they did on manufactured home owners and satisfaction. That said, their research is insightful.

Foremost Report: Manufactured Home Customer Survey and Market Facts

Comments Off on Foremost Report: Manufactured Home Customer Survey and Market Facts



HUD code ...

Foremost Insurance Company has sponsored corporate studies of the manufactured home market since 1979. In recent years, their report is updated every 4 years. The 16 page report attached began by collecting information on October 2 through October 18, 2012. Their survey includes responses from 10,002 respondents who are owners or residents of a manufactured home or a pre-

[Read More »](#)

Even federal data, compiled by HUD, obliquely underscore the miniscule level of complaints, a tiny fraction of a single percent. It thus point to the high level of satisfaction for manufactured home owners.

Federal Data Spotlights Manufactured Home Industry Quality, Regulatory Questions

Comments Off on Federal Data Spotlights Manufactured Home Industry Quality, Regulatory Questions



A statement by HUD's manufactured housing program administrator, Pam Danner, JD, to the Wisconsin Housing Alliance (WHA) became a hot topic of conversation during and after a recent gathering of industry professionals in San Antonio, Texas. Danner reportedly told the WHA that nationwide, there were fewer than 30 manufactured home buyers that went to dispute

resolution. Another Washington, D.C. metro ...

[Read More »](#)

I've interviewed on video perhaps more consumers than anyone else in manufactured housing, including what may be the first video of a [manufactured home owner focus group](#) discussing affordable housing. Please see that video, as it reflects the views of actual home owners, many of whom previously owned conventional housing.

As someone that has lived in and owned several manufactured homes, as well as conventional housing, my wife and I know each side of the housing market, as residents as well as professionals.

Our work includes business development services to manufactured home, and other types of factory-built housing professionals. Our work is respected in the industry, as several letters of recommendation attest.

Something worth noting is that I have perhaps the most extensive set of LinkedIn endorsements and recommendations - the vast majority of which were unrequested - to be found in the manufactured home industry. At last check, they number well over 1,000 such public kudos.

Some of that praise is for our industry-leading trade publishing, which is a team effort.

I've worked in this industry in the following capacities:

- In retail sales,
- in retail sales management,
- as an owner of a manufactured home retail center, which was named as number #76 in this U.S. in sales volume at a time when there were some 20,000 retailers in the America. Rephrased, that sales center hit my former operation in the top fraction of 1/2 of 1 percent of all retailers in the nation.
- Later, I sold that retail center and began doing more writing, contract services, speaking, and consulting. In that career phase and capacity:
- I acted in various management and contract service roles from modest sized to some of the largest manufactured home operations in the U.S.
- For example, I've worked with industry giants like Sun Communities, UMH Properties, and Clayton Homes, but also with family owned communities, and more mid-sized operations. I've also done

projects with ROC USA, Sunshine Homes, Deer Valley Homebuilders, Adventure Homes, independently owned retailers, communities, and others. I've done work with Zeman Homes and Communities, and with others who have lamentably since left the manufactured home industry for various reasons.

- I've also provided services for various trade associations and trade shows, which routinely resulted in public praise, some on camera, some in written form, or both.
- For example, we were publicly praised as being instrumental to the come-back of the Louisville Manufactured Housing Show, which prior to our involvement had been sinking for years, was finally cancelled for a year, and which we worked to bring back. Today, that show is thriving compared to where it was a decade ago.

Those contract and other roles included, but were not necessarily limited to:

- Retail, often in high volume sales locations.
- Work with lenders and financial services firms.
- Land lease communities, what some may mistakenly refer to as a "mobile home park."
- Speaking engagements to companies and trade associations.
- In publishing, we've likely have interviewed more professionals than anyone else in the industry's modern history. Certainly, that would be accurate in our industry's modern era.
- In publishing and with video, we have likely done more genuine video interviews with the owners of manufactured homes, industry professionals, realtors, public officials, and other experts.

Quotes from others...

"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." Bob Thieman, Illinois Manufactured Housing Assoc.

"Tony...There is no question that your company's expertise with the internet was of great value...Our attendance exceed our expectations....I am completely convinced your internet approach made a substantial difference in show turnout." – Dennis Hill, Show Ways Unlimited.

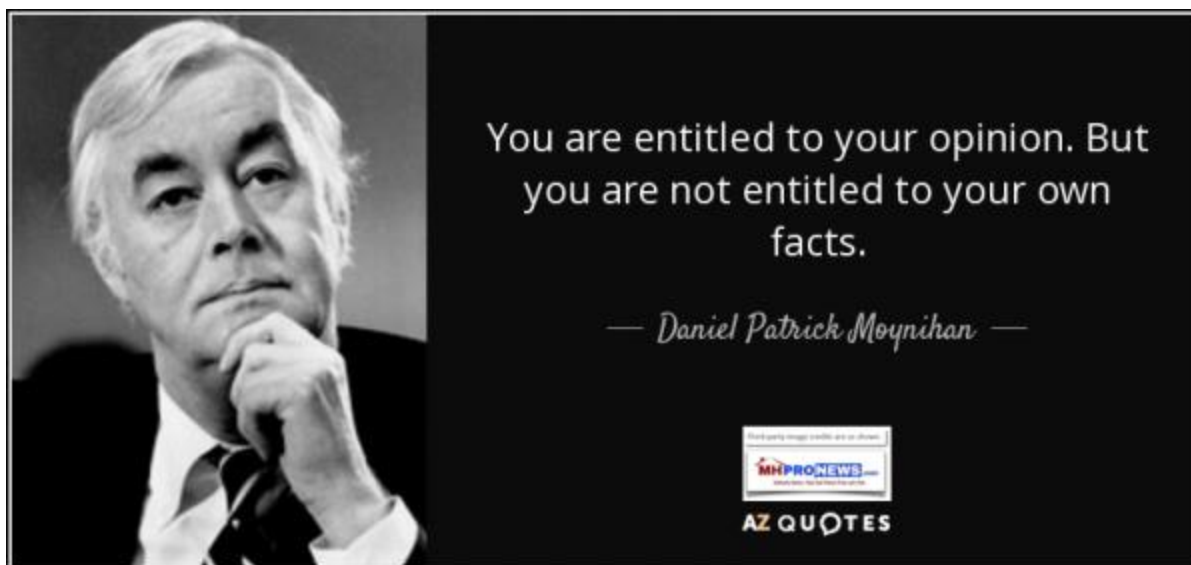
"Some investors...may be hesitant to get directly involved with in-community home sales and financing programs. If you are one of them, consider contacting Tony Kovach." – Eddie Hick's, Consultants Resource Group.

"Introducing Tony and what he has done for our firm with his marketing could be summed up with a single word: 'Impressive!'...Tony's efforts resulted in a documented increase... in a single year at that same location. No others...in our market had such a result...Tony accomplished this with the marketing budgets he inherited." – Sherry Saxon, VP Capital First.

"These guys (Tony & MHProNews.com) are the future of Manufactured Housing!" – George Allen, introducing team at 2011 Louisville Show. This fellow is a competitor, who preceded us in publishing.

I share those as some examples of what others say, to reflect that this writer is a recognized expert.

Our operation doesn't always say or do things that are politically correct. Some of the very people who have praised us, know first-hand that we are willing and able to fact-check them too. But we strive to be fair and accurate in what we publish. We don't merely opine. Rather, we follow the facts, and evidence available at that moment in time.



It is also worth noting that our view on some issues have evolved over time.

But one thing we've done for years is hold the industry's professionals to account for apparent cases of mistreatment of consumers. The example below is just one of many cases of calling professionals to account for their behavior toward customers, other professionals, etc.

<http://www.MHProNews.com/blogs/daily-business-news/george-allen-blasts-mhi-ncc-ignoring-own-spencer-roane-seco-coba7-tom-lackey-controversies/>

MH Industry Impact and Significant Levels of Engagement

On our professional site, in a modest-sized industry, it is common for a single URL on *MHProNews* to have over 8,000 visitors per day in the month of September 2018, per third-party [Webalizer](#). By comparison, the largest LinkedIn manufactured housing groups have 1,000 to some 2,500 members.

Keep in mind that the Manufactured Housing Institute (MHI) claim that there are roughly 40,000 +/- full time equivalent (FTE) professionals in our industry. We've not researched that FTE issue carefully, that number strikes me as low. But those figures provide you with a sense of the depth of engagement that we get from members of our industry. We have numerous other URLs besides *MHProNews*. But the one used for a reference to site data would likely be the largest traffic count. Rephrased for non-techies, our traffic is higher than what is stated, per third-party analytical data nested on the server. You don't get more accurate than that in data.

Federal officials, non-profit organizations, investors, and media are roughly 3-4 percent of our readers, along with an international audience that also follows our trade publishing. The other 96 (+/-) of our *MHProNews* readers are industry professionals.

The point is that thousands of manufactured home industry professionals from coast-to-coast find our content relevant.

Researchers in academic and elsewhere find us relevant. Some of our work has been read into the Congressional Record. The [CFPB cited us in their White Paper](#). Numerous mainstream media outlets have quoted and/or cited our operations' work, and/or me personally.

That data reflects that we have more industry professional engagement than does the Arlington, VA based Manufactured Housing Institute (MHI). That's accurate, even though they have a far larger budget.

We are not a trade group. But no other industry trade media publisher, blogger, or even the largest trade organization comes close to our depth of content, and professional reader engagement.

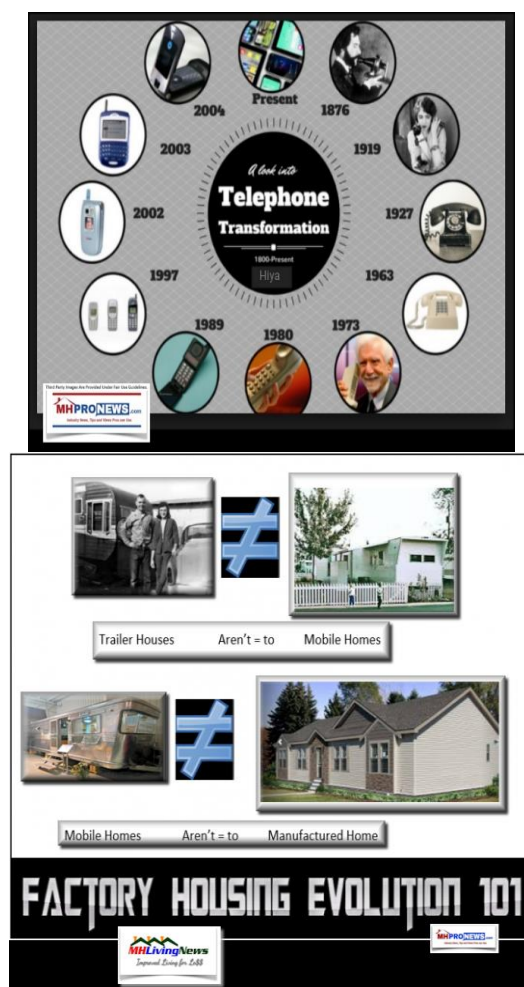
Among the reasons is that we tackle issues that few if any will consider covering. We do so in a serious, and follow-the-evidence fashion.

With that tee up, let me note that my quoting Nathan Smith of SSK Communities is not meant to imply any endorsement of him, his association, or his other views. A quote or reference in this document, or on our websites, generally should be seen as an interesting statement that fits the subject matter, or represents a particular viewpoint. Most agree that no two people will agree on everything.

But facts differ than opinions. Reality is the truth. The truth can be twisted by some to fit a narrative.

Why the Above Matters to AFFH

Pardon the lengthy tee up, but the point is that manufactured homes are widely misunderstood. False and misleading claims are made, often by the educated or people or in places of authority. People believe things about manufactured homes that may have been true 4+ decades ago, during the mobile home era. But just telephones evolved, so has factory-built housing.



III) Affirmatively Furthering Fair Housing (AFFH)

In HUD's August 16, 2018 ANPR, said that it seeks comments on amendments to the current AFFH regulations that will "**encourage actions that increase housing choice, including ... greater housing supply.**" The proven solution to this issue is manufactured housing.



Esther Sullivan, Ph.D., has numerous factual errors in her research, [as exemplified in her 2017 TED Talk](#), when compared to the data on the infographic above highlights. She also [misuses terminology](#), which a

scholar should realize is to be avoided. That said, Professor Sullivan is correct in saying many [turn](#) to manufactured homes for housing when they can't get subsidized or other affordable housing. She is also correct in saying that manufactured homes are often zoned out or otherwise shunned by local jurisdictions.

The stated purpose of the AFFH final rule was **"to provide HUD program participants with a revised planning approach to assist ... in meeting their legal obligation to affirmatively further the purposes and policies of the Fair Housing Act."** Since the publication of that final rule, **"HUD has concluded that the current regulations are ineffective in addressing the lack of adequate housing supply, which has [had] particularly adverse impact[s] on protected classes under the Fair Housing Act."** As a result, **"HUD has determined that a new approach toward AFFH is required"** and is seeking public input through the instant ANPR on conceptual and specific revisions to the AFFH regulatory structure.

Mark Weiss, J.D., president and CEO of the Manufactured Housing Association for Regulatory Reform said:

"Promoting the availability of inherently affordable, non-subsidized manufactured housing is not only a sensible free-market mechanism to increase housing choice and supply, but is also already a specific objective of federal law. Section 602 of the Manufactured Housing Improvement Act of 2000 thus provides that one of the primary purposes of that law, is "to facilitate the availability of affordable manufactured homes and to increase homeownership for all Americans." (42 U.S.C. 5401(b)(2))."

With Weiss' salient thought in mind, it is worth looking at a report *MHProNews* produced in January, 2018 that points to **two laws that are already on the books**. Implementing those and other existing laws could save years of delays. That includes the text for the MHIA of 2000, which should be considered as part of this submission.

<http://www.MHProNews.com/blogs/daily-business-news/two-great-laws-already-on-the-books-now-can-unlock-billion-annually-for-manufactured-housing-industry-businesse-investor/>

Implementing existing laws would be good for almost everyone in the mix, as what follows will highlight. This could save years of struggles with local and state officials. Implementing the law could save years in Congressional battles. Enforcing existing laws are also a mantra that President Donald J. Trump, and Vice President Mike Pence – among other Trump Administration officials – have espoused.

Two Great Laws Already on the Books NOW, Can Unlock Billion\$ Annually for Manufactured Housing Industry Businesse\$, Investor\$

January 26th, 2018 soheyla

Comments off

Tweet



Contrast the opportunity for using existing laws with a housing system that has millions of proven cases of performance, with proposals that are often moved by political, special interest, or inspired by principles that have proven to fail for over 5 decades.



Rick Robinson, J.D., General Counsel for the Manufactured Housing Institute (MHI), provided a comments letter that is [linked here](#). It makes some useful points about examples of discriminatory practices that apply to the AFFH issue.

That said, as with many topics addressed by MHI, the association is all over the map. For example, this past week, they ambiguously raised [Senator Elizabeth Warren's](#) housing plan to the attention of their readers. Did they not realize that Warren's plan runs counter to the interests of the majority of the industry? Or that it runs contrary to the interests of millions of Americans who aspire to be home owners?

Facts & Analysis – Senator Elizabeth Warren re: Manufactured Housing Institute Memo to MHI Members, 10-3-2018

October 6th, 2018 soheyla



The above is but one of several examples of what arguably are at best mixed messages from MHI. Those protestors in the background that Senator Warren is addressing are also members of groups that protested HUD Secretary Ben Carson. That activist group also protested some of MHI's own member companies. MHI is at times logically inexplicable in their positions...

...until one follows the money. More on that later.

A related segue is in order. There are times that the political leaders of our nation, and/or the manufactured housing industry, come together for a good cause. A pending report that exemplifies that will be found later this week as a special report at the link below.

[President Bill Clinton, Newt Gingrich, MHI, MHARR, Others Historic Unity for Manufactured Housing Improvement Act - Example of Working Together for the Good of All](#)

As political independents, we are open to a variety of sources on issues. Among the tests are we use for curating content for our readers/clients about a given source include, but are not limited to:

- is the information accurate,
- properly applied to an industry-relevant topic,
- ethical,
- in keeping with equal justice under law,
- and historically proven.

For example, we spotlighted [Senator Elizabeth Warren](#) taking on Warren Buffett, Chairman of Berkshire Hathaway, to task for monopolistic practices. She is not alone in that concern. Her comments to the progressive publisher, the *Nation* – linked from her name above - were spotlighted by [MHProNews at this link here.](#)

Others across the left-right media and political divide share the concern about the impact of monopoly on businesses, wages, and the economy. We've looked specifically at that issue as it impacts the manufactured home industry. A tangential point is that poverty is for many a racket. Who says? Progressives. They have good evidence.

Acclaimed Poverty Inc. Video, MHVille – Why Left & Right Should Listen, Learn From Each Other

September 10th, 2018 soheyla Comments off

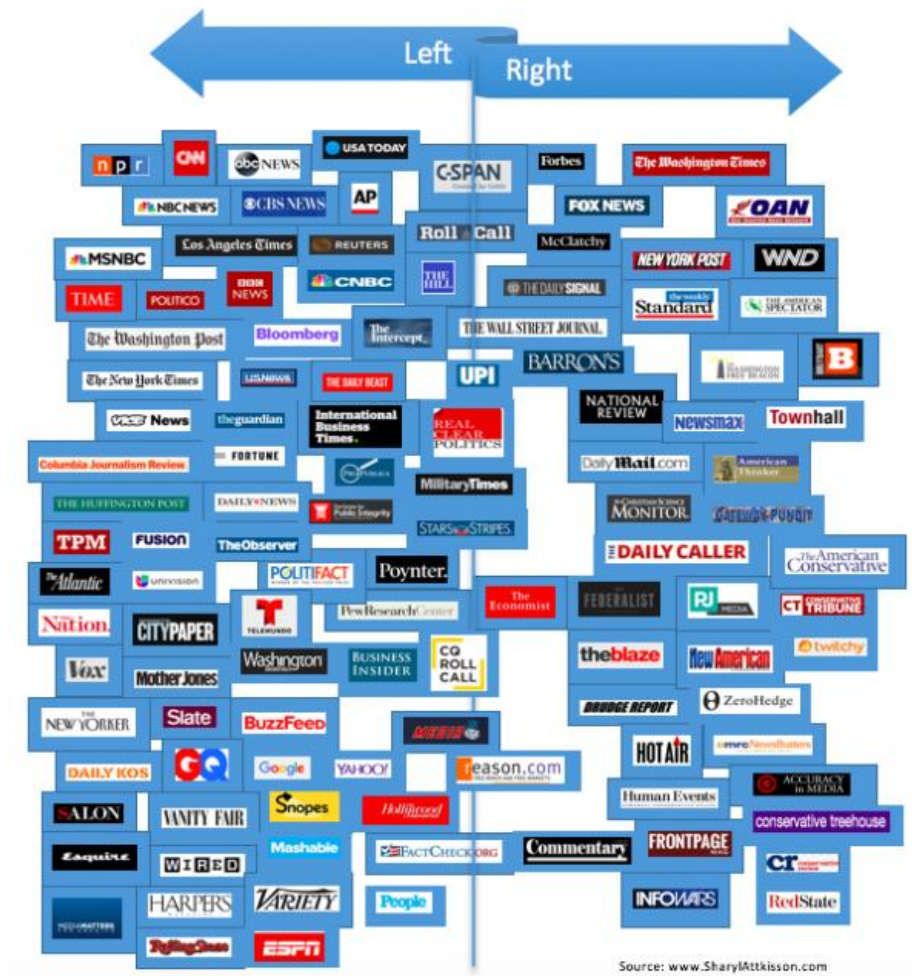


**"Having a heart for the poor isn't hard.
Having a mind for the poor, that's the challenge."**

– Poverty, Inc.

"You cannot start an economy when ownership is in question."

– Chinery-Hesse, in *Poverty, Inc.*



Source: www.SharylAttikisson.com

There are some topics that the left-leaning media tends to cover better than the right, and vice-versa. Among the points made in the article linked below is this. When Berkshire Hathaway owns dozens of media outlets, why do they so rarely address the misinformation about manufactured housing?

Kevin Clayton, Leslie Gooch Sound-off; Left & Right Agree? Manufactured Homeland, MHI, & You

August 14th, 2018 soheyla

Comments off



Next, let me draw your attention to the following research.

Scholastica 'Gay' Cororaton is a Certified Business Economist (CBE) for NAR. Ms. Cororaton told me that Dr. Yun – their chief economist - asked her to do the research she published earlier this year on manufactured homes. When her research was first published, there were certain adjustments that needed to be made in terminology on some graphics, a few factual errors, and other edits which I brought to her attention. She double checked, agreed, and promptly made those corrections. NAR then republished the document with those corrections. They also corrected the same fixes on the Realtor University website.

Realtor University, Journal for the Center of Real Estate Studies, Makes Corrections- "The Market for Manufactured Homes," by Scholastica 'Gay' Cororaton, CBE

July 25th, 2018 soheyla

Comments off



That is how professionals ought to be, and that's a tip-of-the-hat to her and her colleagues. I mention that in part, because sadly, MHI has demonstrably failed at making corrections when errors are brought to their attention.

Ms. Cororaton took the added step of cited me in the first footnote in the summary of her research, which is found as a download linked below.

Realtor University, Analysis and the Manufactured Housing Institute (MHI)

July 18th, 2018 soheyla

Comments off



Cororaton likewise cited another industry colleague, Mark Weiss, J.D. Mr. Wiess is the President and CEO of the Manufactured Housing Association for Regulatory Reform (MHARR). His comments on this [AFFH issue](#), are found at the linked article below.

<https://manufacturedhousingassociationregulatoryreform.org/mharr-calls-on-hud-to-remove-zoning-placement-and-consumer-financing-barriers-to-manufactured-homes/>

This should beg the question. Why didn't the Manufactured Housing Institute (MHI) contact Ms. Cororaton with the same comments and concerns about factual errors or terminology glitches in her initial report? We waited a few weeks after her work was published, before reaching out to point out certain fact or terminology issues. MHI has a staff and budget far larger than ours, or MHARR's, etc. Didn't MHI care enough to make sure that the details were accurate?

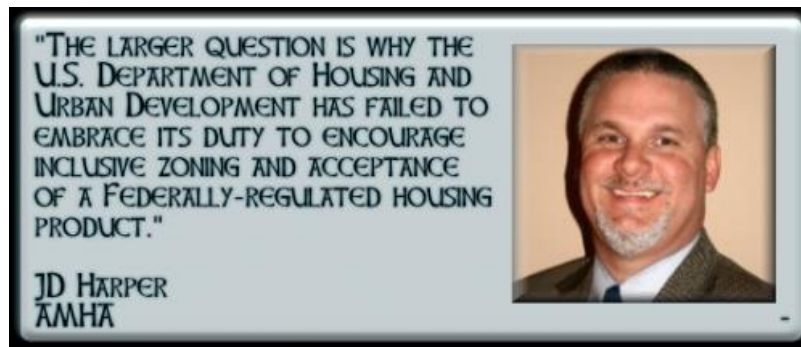
Let's leave those questions about MHI hanging for now.

NAR's research came after the [Urban Institute](#) published their report on manufactured homes and the affordable housing crisis. In our series of **'follow the money'** fact-checks and analysis of their report (linked below), we noted that the involvement of a former HUD official was not made clear on the page that report was published on. Neither was their clarity on the role that Clayton Homes or the Manufactured Housing Institute (MHI) played. Sources at the [Urban Institute told MHPProNews that they assured MHI, Clayton and their affiliates of anonymity](#). What? On a university-level style report?

One of those researchers that co-authored the Urban Institute report was Edward Golding. **Golding was previously in the chain of command at HUD that Office of Manufactured Housing Program Director, Pam Danner, J.D.** Per our sources – **Golding would have been familiar with enhanced preemption found in the Manufactured Housing Improvement Act of 2000.**

So why wasn't enhanced preemption emphasized by the Urban Institute?

That's a serious issue to scores of manufactured housing professionals. Here's one example.



One must ask, how could the Urban Institute raise the issue of "**restrictive zoning**," without mentioning enhanced preemption?

It is an issue that MHARR raises numerous times every year. This is one of several examples, from this year alone, on the MHARR website.

<https://manufacturedhousingassociationregulatoryreform.org/restoring-the-rule-of-law-to-manufactured-housing-regulation/>

The *Washington Post* - in their own report on manufactured housing - noted that it was MHARR that pushed for Pam Danner's removal at the OMHP at HUD. By contrast, MHI's SVP Lesli Gooch, Ph.D., admitted to *WaPo* they didn't put pressure on HUD to have Danner removed. Why not?

https://www.washingtonpost.com/politics/a-once-obscure-office-at-hud-is-the-subject-of-unusually-intense-lobbying-effort/2018/04/30/3dfc7ba0-3841-11e8-acd5-35eac230e514_story.html

Why not? Why didn't MHI press HUD for Danner's removal?

One potential answer is the purported efforts by Berkshire Hathaway owned Clayton homes and their sister companies in manufactured housing to grow the Warren Buffett moat in our industry. By keeping the industry from growing at the pace that manufactured homes are capable of achieving, by causing consolidation of the industry by limiting growth, the result is that Clayton's market share has grown dramatically over the last 15 years.

Consider these two quotes from Harvard's Eric Belsky.



"Credit is the lifeblood of housing." – Eric Belsky

"There are multiple reasons to expect manufactured housing to do better than site built housing in the [current] decade."

– Eric Belsky

Executive Director Joint Center of Housing Studies at Harvard University.

Second quote from May 2000 issue of Modern Homes Development, per MHI.



Those two quotes may not seem to relate at first blush, but they absolutely do. Belsky was among the university and [nonprofit researchers](#) in the late 1990s and early 2000s who said that the quality of manufactured homes had improved significantly. That manufactured homes were poised to overtake conventional housing. That expected surge of manufactured home sales didn't happen. Why not?

That's examined in detail in the report linked below. It quotes Warren Buffett extensively. It cites a key document from 21st Mortgage Corp, that was provided to *MHI ProNews* as a news tip by a reader. It also examines a nearly hour-long video interview with Kevin Clayton of Clayton Homes.

Smoking Gun 3 – Warren Buffett, Kevin Clayton, Clayton Homes, 21st Mortgage Corp Tim Williams – Manufactured Home Lending, Sales Grab?

May 9th, 2018

soheyla

Comments off

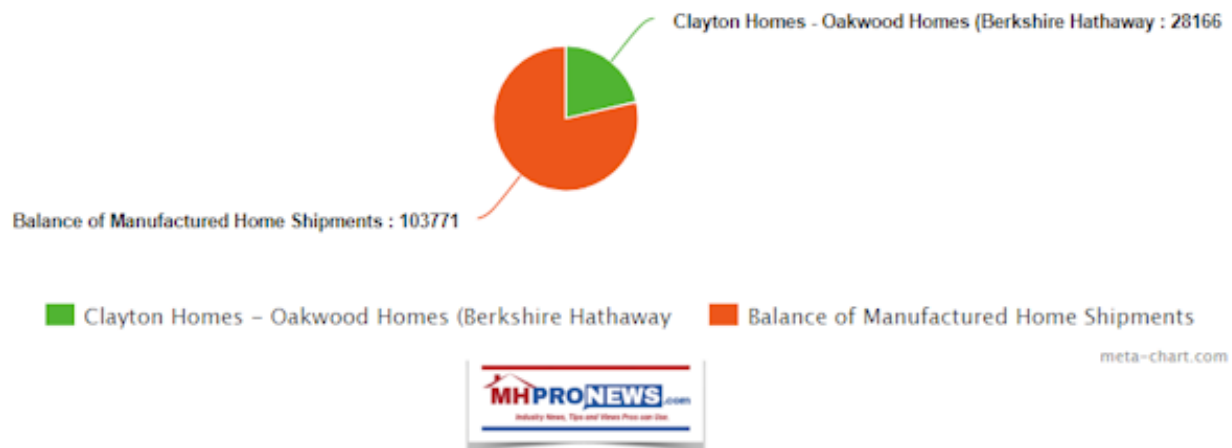


Smoking Gun 3 - Warren Buffett, Kevin Clayton, Clayton Homes, 21st Mortgage Corp Tim Williams - Manufactured Home Lending, Sales Grab?

<http://www.MHProNews.com/blogs/daily-business-news/smoking-gun-3-warren-buffett-kevin-clayton-clayton-homes-21st-mortgage-corp-tim-williams-manufactured-home-lending-sales-grab/>

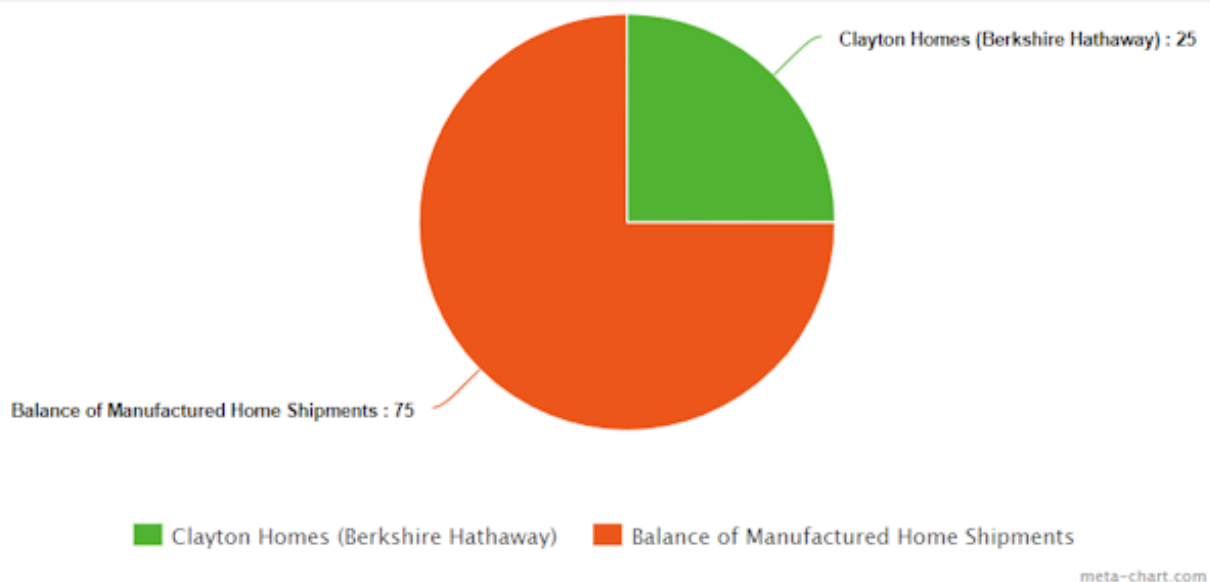
How does that relate to AFFH and the lack of affordable housing? Because as the sale of manufactured homes declined, the growth in the need of subsidized and other housing grew. Other housing market impacts followed too. Here are just some of the facts.

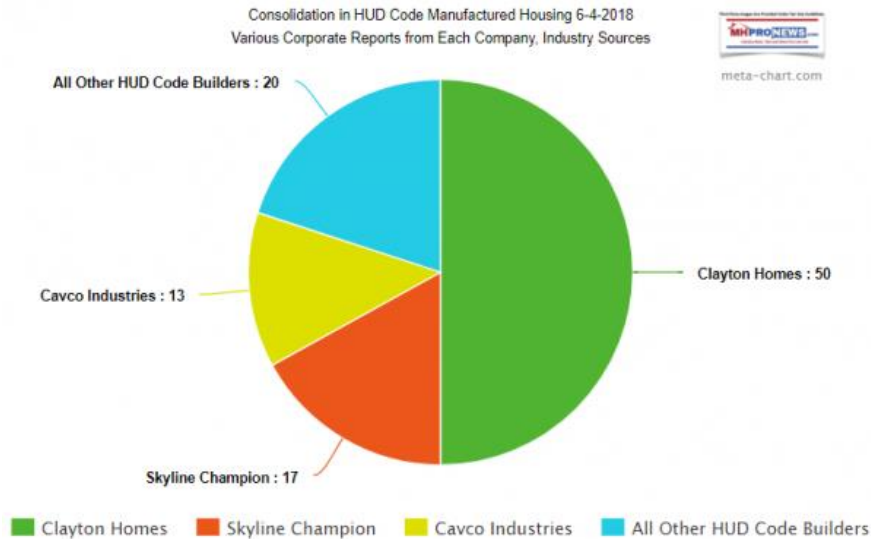
Clayton Homes - Oakwood Homes (Berkshire Hathaway) Market Share End of 2003
Total Shipments: 130,937. Sources: HUD, Manufactured Home Merchandiser Magazine.



It is my understanding that HUD has the ability to refer matters to other federal agencies for investigation.

Clayton Homes (Berkshire Hathaway) 25% Market Share in 2011
Total 2011 Shipments: 51,618. Sources: Manufactured Housing Association for Regulatory Reform (MHARR).

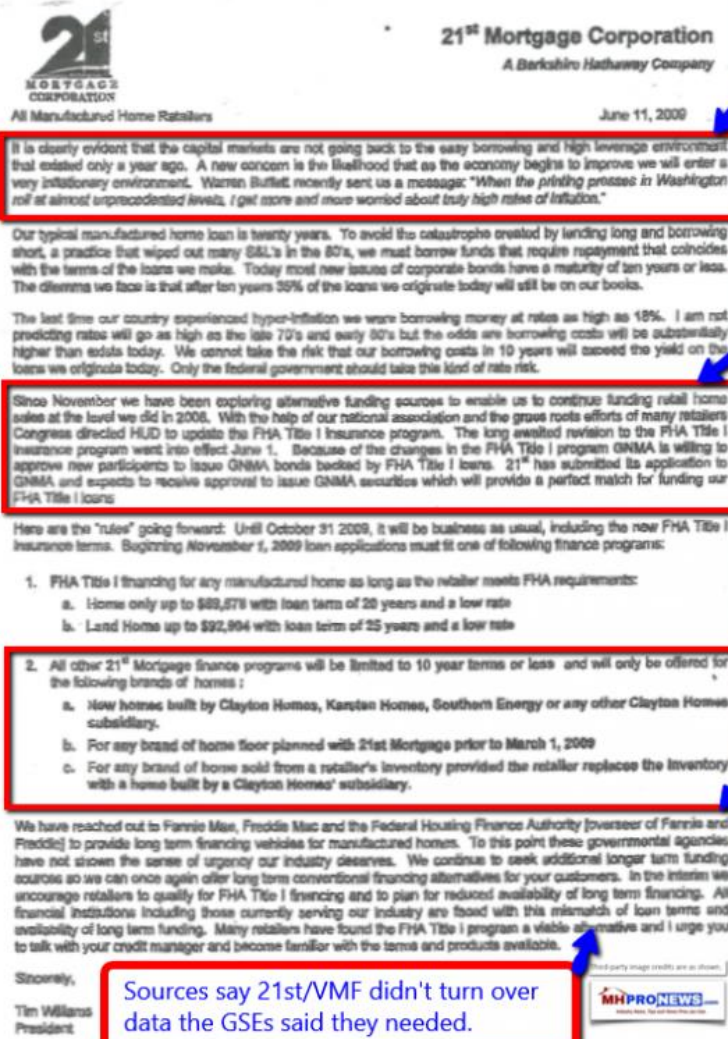




Based upon the information being provided here, and linked, we suggest and respectfully request that HUD formally asks for the FTC, DOJ and Congress to each investigate the Manufactured Housing Institute, Berkshire Hathaway, Clayton Homes, 21st Mortgage, et al for antitrust and other purportedly illicit and potentially illegal action.



All of the above can arguably be traced back to this nexus, reflected in the document below.



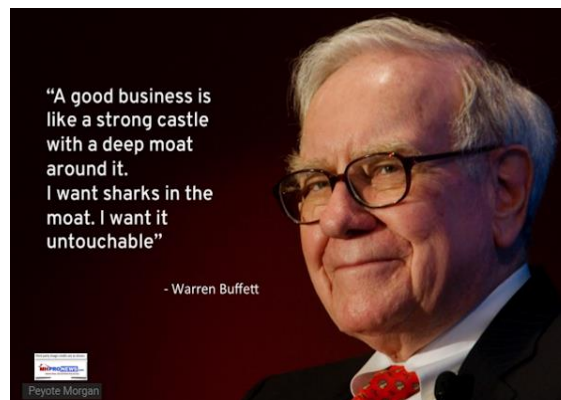
This inflation prediction proved not to be accurate.

As industry members may recall, only 2 companies were able to meet the capital revised FHA Title 1 "10/10" rule.

Note the favoritism shown to Clayton/ Berkshire Hathaway products?

MHI is well aware of antitrust concerns, because their own warning statement indicates as much. The highlighted items in the attached MHI document, [linked here](#), are some of the items that federal investigators should be researching.

The 21st Mortgage letter above should be understood in the light of the following Buffett axiom.



GuruFocus and others in the mainstream media have viewed that as a principle of the 'moat' as a means of steadily creating a monopoly over time.

Seattle Times -Federal Investigations-Berkshire Hathaway's Clayton Homes, GuruFocus Spotlights Buffett's Clayton's "Unethical," Monopolistic Moat

May 21st, 2018 soheyla

Comments off



Just hours or days before an expected Congressional vote in the House on their version of S. 2155, the Seattle Times is reporting on federal investigations into the business practices of Clayton Homes, Vanderbilt Mortgage, and their affiliated Berkshire Hathaway lending units.

<http://www.MHProNews.com/blogs/daily-business-news/seattle-times-federal-investigations-berkshire-hathaways-clayton-homes-gurufocus-spotlights-buffetts-claytons-unethical-monopolistic-moat/>

If AFFH and enhanced preemption were promoted properly, millions could become home owners, and NBER researchers say that some \$2 trillion dollars a year in additional GDP would be created.

"Thou Shall Not Steal," \$2 Trillion Annually Lost to Lack of Affordable Homes, Making the Manufactured Home Case

August 4th, 2018 soheyla

Comments off



After years of arguably failed polite talk, perhaps more direct and blunt words are needed.

Rephrased, what the evidence shows is that Berkshire Hathaway and a few giants are dominating MHI, and through them, control much of the advocacy of the industry. Lavin, an MHI award winner, is just one of several critics of the Arlington, VA based trade group.



"So the association [MHI] is not there for the "industry," unless the interests of the Big Boys join the industry's."

- Marty Lavin, J.D.
MHI Award Winner
High Volume Retailer, Community
Owner, Finance Expert.



It frankly took this writer some time before the nuances of what appears on the surface to be pro-MH industry advocacy by MHI measures up against the reality of their effectiveness.



"Follow the Money."

-Marty Lavin, JD,
MHI Award Winner

"Pay more attention to what people do than what they say."

- Marty Lavin, finance, community,
retail veteran.



**Lavin's 72' yacht, Spy Sea,
collage credits, Marty Lavin,
MHI and MHPRONews.**



But listening to others, carefully studying the issues, and 'following the evidence' and 'the money' revealed a pattern.



"It puzzles me why the auto, boating and RV industries can sell their products, which in many cases are much more costly than ours, with far fewer financing hurdles and regulations than the manufactured housing industry. In my opinion, we have done a poor job of advancing our cause and lobbying for our industry."

- Kenny Lipschutz

#48 among MHCs, over 4000 home sites, per NCC.

48 HomeFirst Certified Communities Birmingham, MI 4,176

Text and collage credit by:



"Due to the lack of effective representation at a national level, the MHCA withdrew its membership from the national association [re: Manufactured Housing Institute, MHI] to

pursue other avenues of representation. We are not the only state association to do so. The MHCA has been exploring other options; including hiring a lobbying firm that is prominent in Washington, D.C."

- Neal T Haney, President.

Third-party image credits are as shown.



More details, which include cross linked items that must be followed to fully grasp this, are found in the report linked below.

State Associations, Companies Quit Membership in Manufactured Housing Institute, (MHI), One Explains in Writing, 'Why?'

February 9th, 2018 soheyla

Comments off



Let's be clear.

The withdrawal letter now-published by the Manufactured Housing Communities of Arizona (MHCA) on **Industry Voices** is sober. It is a low key, 'here are the facts' now-open letter about why they've quit the Manufactured Housing Institute (MHI).

But it might as well have been a bomb, as it is sending shock-waves

through the industry as to its significance for MHI.

Having witnessed literally thousands of independent retailers vanish since the last high of 1998, due to choking off lending, etc. to independents. That is outlined in the *Smoking Gun 3* report, linked above. Mindful of that, there are voices that are understandably reluctant to speak up publicly.

How Many MH Independents, Retailers Have Been Lost Recently? "They Think They Own Us"

February 14th, 2018 soheyla

Comments off



"I've always believed MHI does the bidding of the big manufacturers and now REIT communities," said an email from a state association leader with ties to the Manufactured Housing Institute (MHI) to the *Daily Business News*.

The facts cited above, include a reference to research published by the *Atlantic*. They stated the loss of manufactured housing retailers in the following way. While some of their terminology is wrong - these are manufactured homes, not mobile homes – their data was sadly all too accurate.

America's Fastest-Dying Business? It's Mobile Homes

The Atlantic



But when it comes to unlucky industries, it's manufactured home (aka mobile home) retailers who really hit the trifecta*. First they missed out on the housing boom. Then they felt the gut-punch of the recession. Now they might yet miss out on the recovery. That makes them America's fastest dying industry, according to a new report from *IBISWorld*.

10 Key Dying Industries

	Revenue 2010 (\$ million)	Decline 2009-10 (%)	Forecast Decline 2010-16 (%)
Wired Telecommunications Carriers	154,096	-54.9	-37.1
Mills	54,645	-50.2	-10.0
Newspaper Publishing	40,726	-35.9	-18.8
Apparel Manufacturing	12,800	-77.1	-8.5
DVD, Game & Video Rental	7,839	-35.7	-19.3
Manufactured Home Dealers	4,538	-73.7	-62.0
Video Postproduction Services	4,276	-24.9	-10.7
Record Stores	1,804	-76.3	-39.7
Photofinishing	1,603	-69.1	-39.1
Formal Wear & Costume Rental	736	-35.0	-14.6

Composite images from *The Atlantic*, collage credit by the *Daily Business News* on *MHProNews.com*, provided under Fair Use Guidelines.

The bottom section of the graphic above is blown up for easier reading. Again, this is from the [Atlantic](#).

according to a new report from [IBISWorld](#).

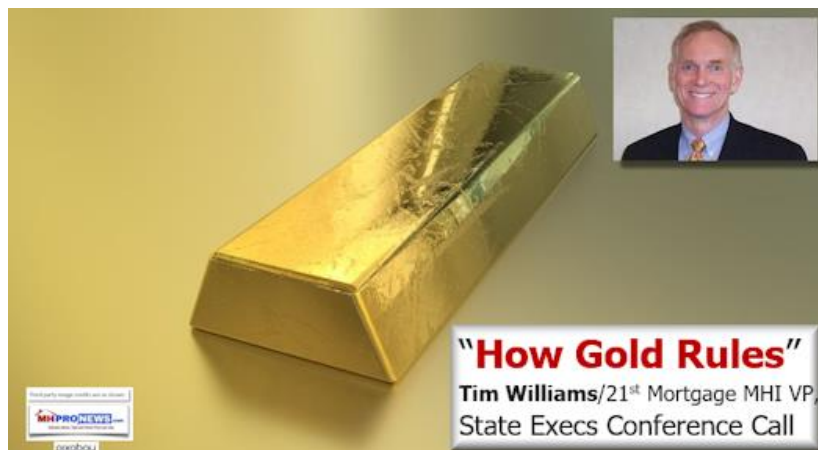
In an exclusive recent spotlight in anticipation of this pending Clayton deal, note how the IBIS World, Atlantic report predicted that it would be independent retailers that would vanish.

10 Key Dying Industries

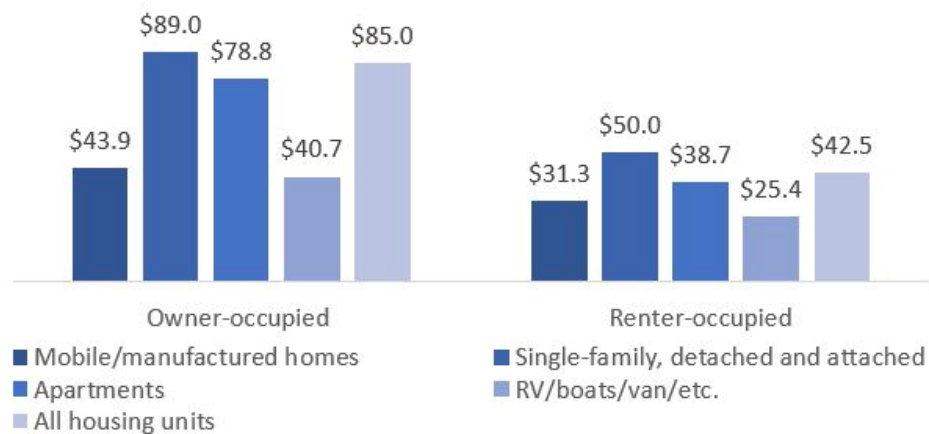
	Revenue 2010 (\$ million)	Decline 2000-10 (%)	Forecast Decline 2010-16 (%)
Wired Telecommunications Carriers	154,096	-54.9	-37.1
Mills	54,645	-50.2	-10.0
Newspaper Publishing	40,726	-35.9	-18.8
Apparel Manufacturing	12,800	-77.1	-8.5
DVD, Game & Video Rental	7,839	-35.7	-19.3
Manufactured Home Dealers	4,538	-73.7	-62.0
Video Postproduction Services	4,276	-24.9	-10.7
Record Stores	1,804	-76.3	-39.7
Photofinishing	1,603	-69.1	-39.1
Formal Wear & Costume Rental	736	-35.0	-14.6

Composite images from *The Atlantic*, collage credit by the Daily Business News on [MHPProNews.com](#), provided under Fair Use Guidelines.

These are the kinds of reports that bring manufactured housing professionals are flocking to our pages to read by the thousands.



Median Household Income in 2016, By Type of Household Unit and Tenure, in Thousand Dollars

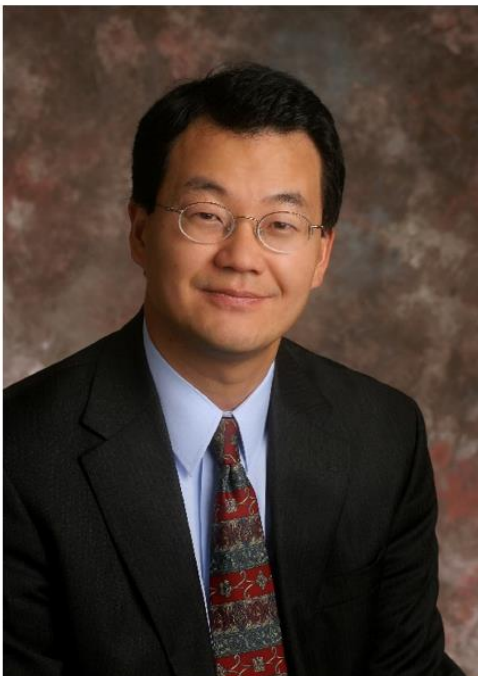


Source: Author's tabulation of ACS, 2016, PUMS



NAR data reveals that apartment dwellers often earn more than the owner of manufactured homes, which suggests millions could make the switch and begin building equity.

<https://realtor.u.edu/making-case-manufactured-homes/>



"The only way to lessen home price growth is to bring in more supply. It cannot be a simple case of existing homeowners listing their home..."

"But as evidenced by fast-rising rents and fast-rising home prices, we cannot expect a further fall in vacancy rates to handle the ongoing and growing housing shortage gaps."

"...the country is short by 8.3 million housing units."

"The only way to bring additional supply, therefore, is for homebuilders to get really busy."

- Lawrence Yun
Chief Economist, National Association of Realtors™ (NAR)

NAR is far from alone in showing manufactured homes as a possible solution to the affordable housing crisis.

Bloomberg "New Home for \$90,000? Manufactured Housing Is Making a Comeback" Reveals MH Media Challenge



August 16th, 2018



soheyla



Comments off



<http://www.MHProNews.com/blogs/daily-business-news/bloomberg-new-home-for-90000-manufactured-housing-is-making-a-comeback-reveals-mh-media-challenge/>

The reasons that manufactured homes are poised to be a solution for affordable housing, and the enhanced preemption found in the Manufactured Housing Improvement Act of 2000 could speed the way for AFFH, are all based upon facts and documentable evidence.



"Compared with the unregulated mobile/trailer homes of the past, the manufactured homes built after 1976 have a higher level of safety, durability, and quality, and the small fraction of homes damaged during hurricanes attests to their safety and durability."

- Scholastica "Gay" D. Cororaton,
Certified Business Economist (CBE),
National Association of Realtors ® (NAR).



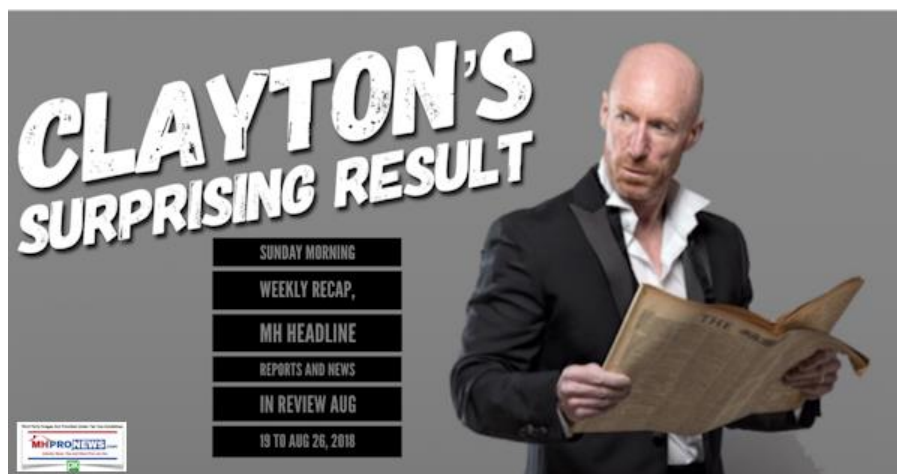
MHI has failed to spotlight positive research that could lift manufactured housing that our research has uncovered. Some examples are [linked here](#) and [here](#). Why would a trade association that claims to be promoting the industry fail to spotlight such good news that could win more acceptance for the industry?



<http://www.MHProNews.com/blogs/daily-business-news/warren-buffett-would-be-okay-with-clayton-homes-losing-money-says-kevin-clayton-but-why/>

The purported answer is what *Smoking Gun 3* suggested, or what the report above spotlighted.

Losing money is one way to drive competitors out of business. Kevin Clayton's own words indicated that Buffett was ok with losing money, so long as Clayton grew their 'moat.' Clayton corporately didn't lose money. But Clayton allowed dozens of their retail centers to operate at a loss, per sources, those losses occurred for years. They were *eventually* closed. But in the meantime, how many businesses were put out of business? How much did that cost taxpayers? How did that end up limiting options of consumers?



Here are those two NBER researchers previously noted. The pull quote says much, but their full report is linked from the graphic too.

“As described by Glaeser (2014), since the 1960s coastal U.S. cities have gone through a property rights revolution which has significantly reduced the elasticity of housing supply: **“In the 1960s, developers found it easy to do business in much of the country. In the past 25 years, construction has come to face enormous challenges from any local opposition. In some areas it feels as if every neighbor has veto rights over every project.””**

Housing Constraints and Spatial Misallocation

Chang-Tai Hsieh
University of Chicago and NBER

Enrico Moretti *
University of California, Berkeley and NBER

Where party image credits are as shown.

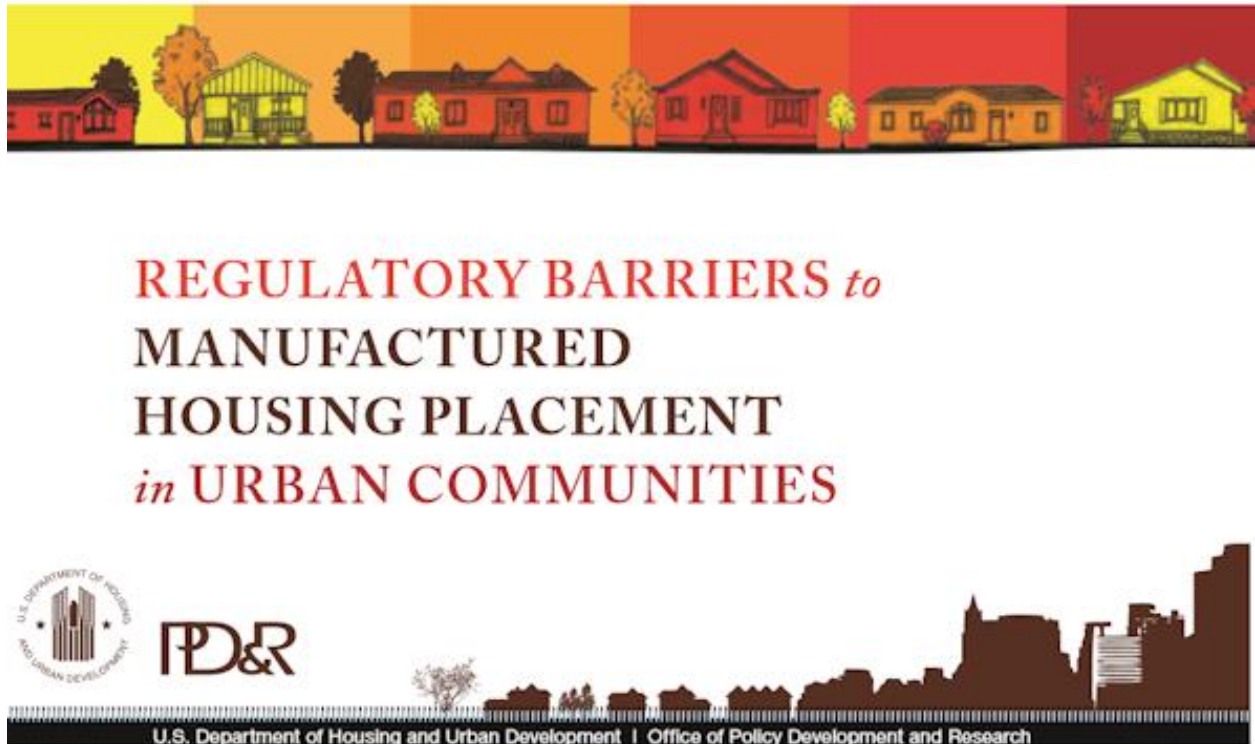
MH PRO NEWS
Manufactured Home News Service

Fear is a factor that keeps many from considering manufactured homes. But a closer look at the data would defuse the fear.

What the Urban Institute ‘reveals’ below is something that has been known for years.

<https://www.urban.org/urban-wire/new-evidence-shows-manufactured-homes-appreciate-well-site-built-homes>

Who knew that in advance of the Urban Institute or FHFA research? HUD, via the report linked below, first published in 2011. But again, what is missing in many documents is a full, robust understanding of *enhanced preemption* that could cut through the NIMBY noise.



Once the facts noted and linked herein are understood, then the following begins to make perfect sense.

<https://www.manufacturedhomelivingnews.com/improving-resale-values-manufactured-home-owners-professionals-shoppers-nmhoa-mhaction-whats-right-wrong-supply-demand-how-to-achieve-mutual-victories/>

While there are some legitimate stories of manufactured homes that needed service or installation related corrections, like those cited by the *Washington Post*, the reality is that the numbers are tiny. Also, there are similar if not more such issues with conventional housing. Who says? Mainstream-media, see the videos posted in the report below.

<https://www.manufacturedhomelivingnews.com/expose-heartbroken-conventional-housing-buyers-dare-to-compare-site-built-with-modern-manufactured-homes/>

Please take a step back. Stop and think. When third-party researchers demonstrate that manufactured homes today rival conventional housing in quality, durability, energy savings, etc. - and manufactured homes are so much lower in cost – why aren't there droves flocking to the industry?

In a phrase, a lack of proper information.



"Negative articles on the industry are met with "no comment" [by MHI]. Positive news opportunities are met with "no comment." I've never seen anything like it."

"Probably the greatest enemy to the growth of the mobile home park industry into a mainstream form of real estate investment is ... our industry itself."

Frank Rolfe, RV Horizons and MHU. To see that report, click this image.

[Frank Rolfe](#) is controversial, but for years he hit MHI for failure to properly engage the media.

MHI is widely seen as a 'tool' of Berkshire Hathaway owned brands that dominate their agenda in manufactured housing. Just as Clayton/21st purportedly throttled lending to independents that didn't by Clayton product, there is another similar move that's allegedly been underway for years, with respect the the GSEs and their Duty to Serve manufactured housing. Consider [Bob Crawford's video comments](#), [linked here](#), about MHI.

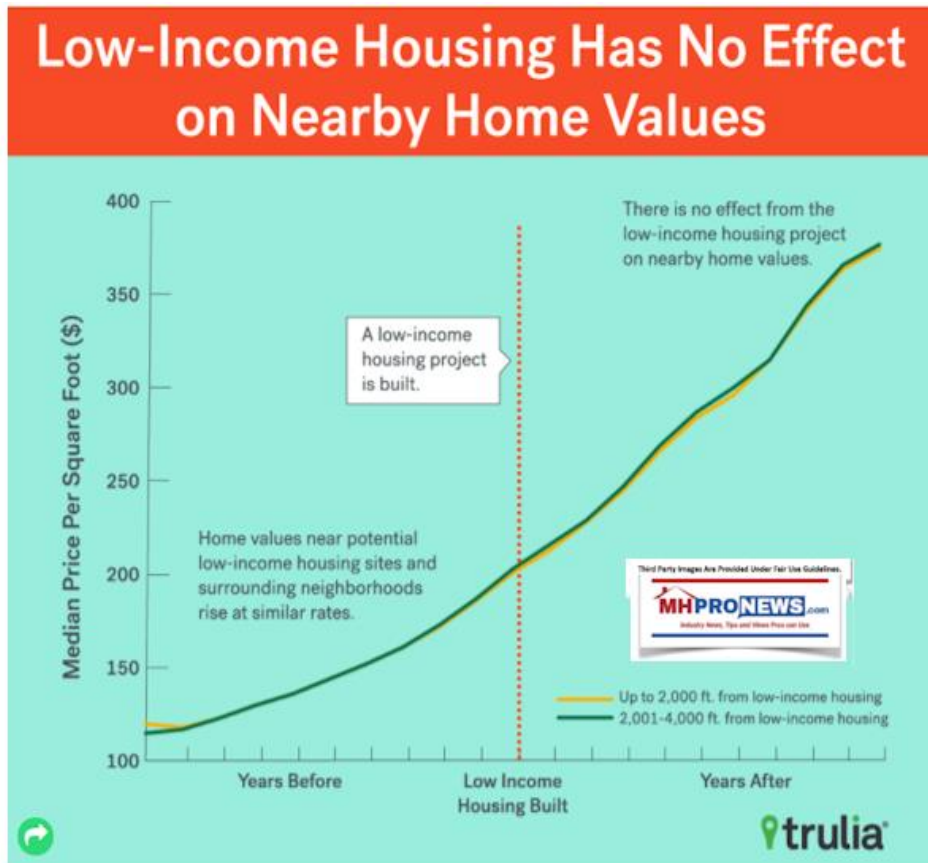
MHI sources gave us the following insights, just last week. The related reports, linked from the below and other reports, connect-the-dots for those studying this critical issue, as it impacts AFFH and more affordable housing.



HUD Secretary Carson promised a new era of cooperation with the manufactured home industry.



Trulia did research on affordable housing in general, that came to a very similar conclusion as the 2011 HUD PD&R research revealed.



Least Affordable Housing Markets and Low-Income Housing Projects

Very specifically looking at the AFFH related, is this YIMBY vs. NIMBY report, that [cited the above](#).

POLITICO

The White House published a "toolkit" of economic evidence and policy tips to help local political leaders fight back against the NIMBYs that tend to hold many poor municipal zoning meetings. L.A. Photo.

**"YIMBY vs. NIMBY,"
Obama Admin Concept
Could Unlock
\$1.95 Trillion Annually,
HUD & Manufactured
Housing Impact**

Third party image credits are as shown.
MHPRONEWS.com
 Industry News, Tips and More From our Site

Ben Carson
U.S. Representative

MYTH

In markets where premium homes are far more expensive than starter homes, **inventory is lower** because it's harder to trade up.

- AND -

Markets that have seen big price increases have **lower inventory** because homes become unaffordable.



FACT

BUSTED

Neither rising prices nor price spreads among homes has a significant impact on inventory compared to homebuilding and investor activity



MYTH

Markets with more homebuilding will have **more inventory** because new homes provide supply that existing owners can trade up to.

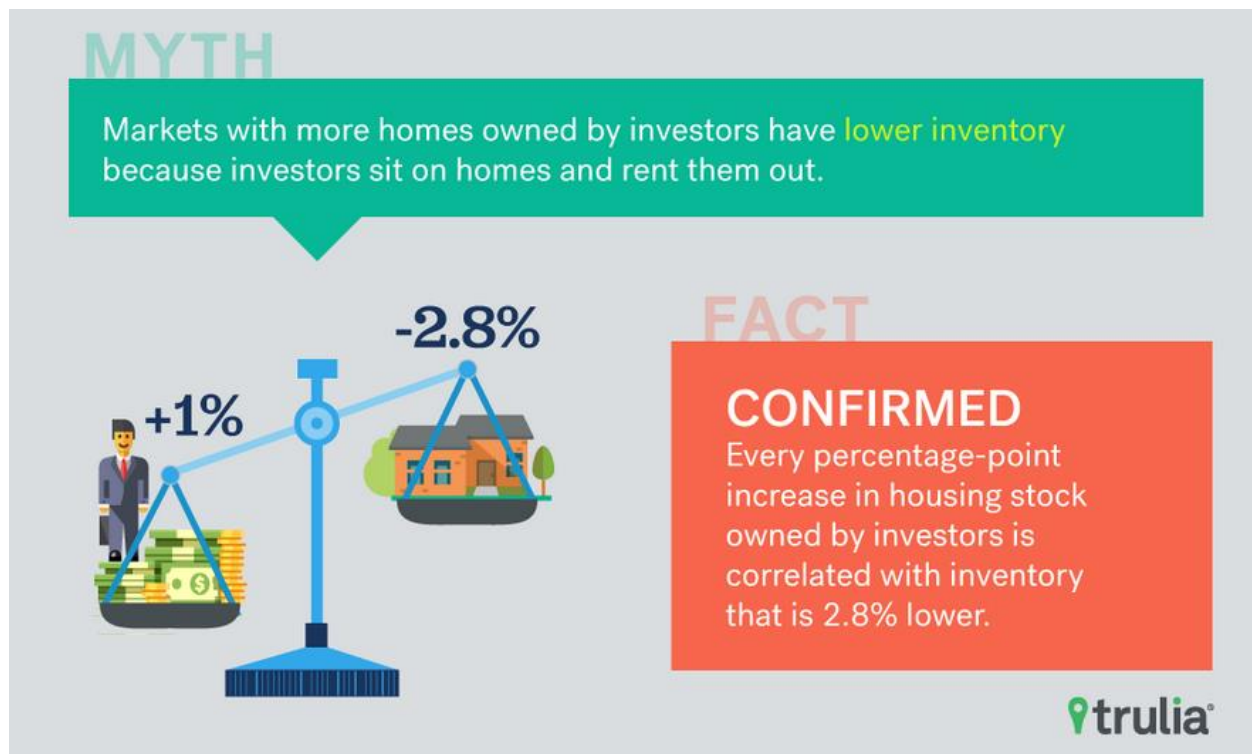
FACT

CONFIRMED

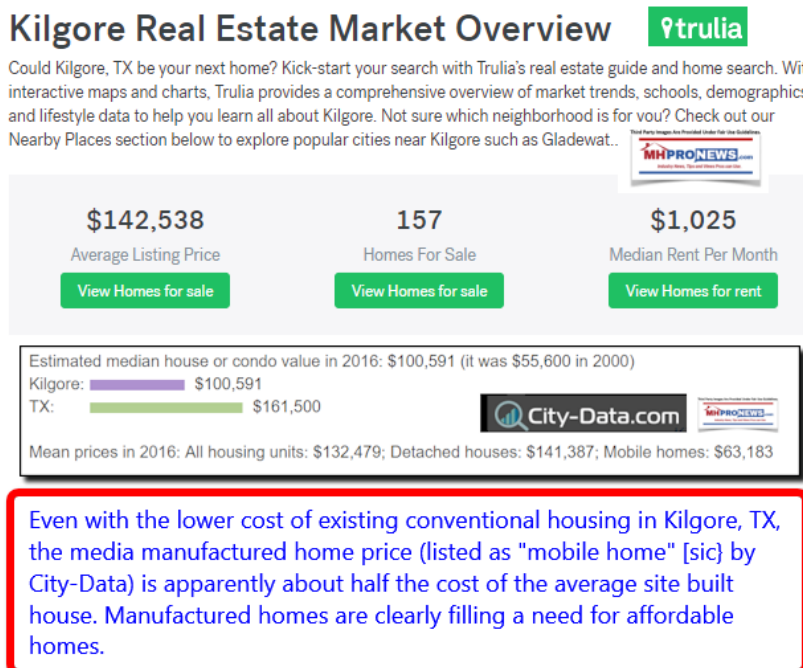
For every percentage-point increase in a market's housing stock, inventory increased approximately 13%.



In the light of the above and below, are there any good reasons to delay enforcing existing laws? Why shouldn't the Manufactured Housing Improvement Act of 2000, and the Duty to Serve Manufactured Housing by the GSEs be fully and robustly enforced? Why [shouldn't HUD step up with more MH lending?](#)



The screen capture below is one of thousands of such examples possible.



But prejudice and ignorance are costing the nation and millions of Americans affordable housing opportunities, from coast-to-coast. Here is another example.

<http://www.MHProNews.com/blogs/daily-business-news/evergreen-manufactured-homes-and-nimby-why-the-feds-must-step-in/>



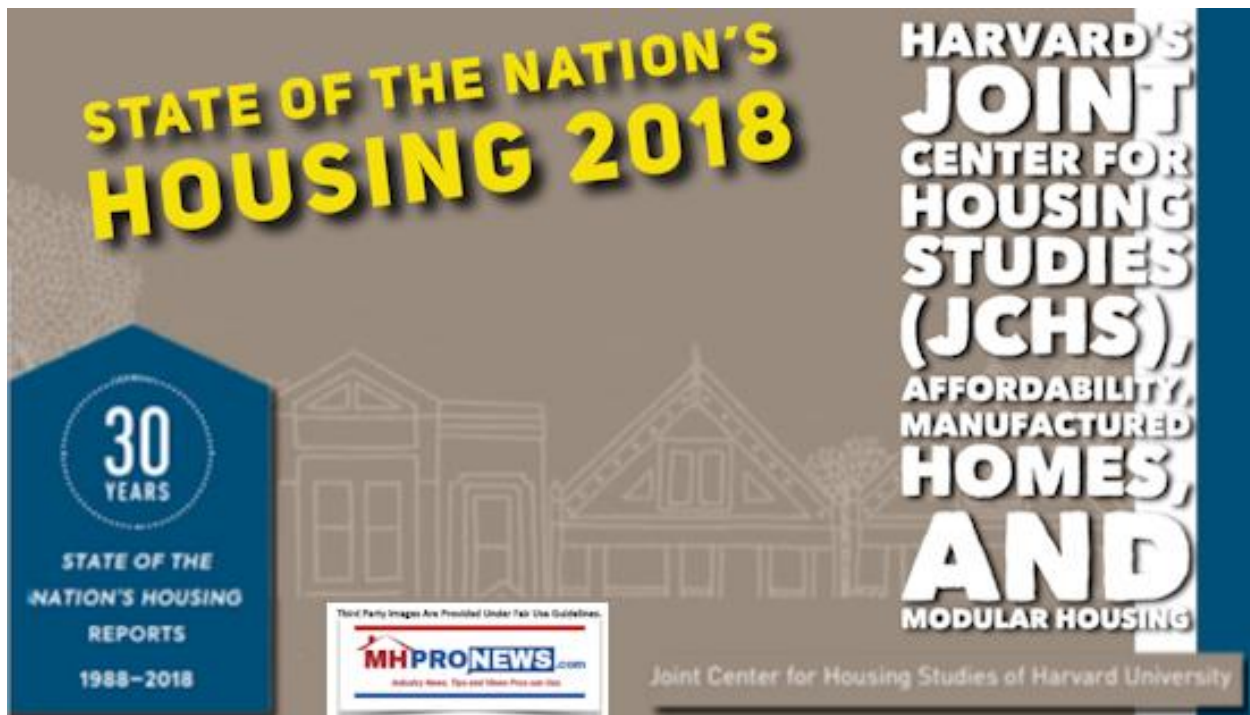
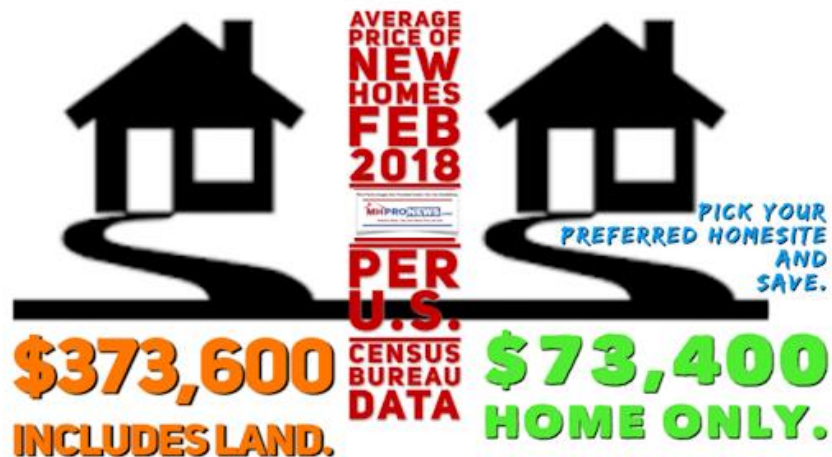
Ignorance about issues such as crime and manufactured homes are another fallacy that must be rejected, based upon the evidence of third-party researchers.



Thankfully, for the first time in years, under the Trump Administration, there are new companies entering the manufactured housing production arena.

<http://www.MHProNews.com/blogs/daily-business-news/danny-glover-presidents-barack-obama-donald-trump-promises-kept-and-affordable-manufactured-housing/>

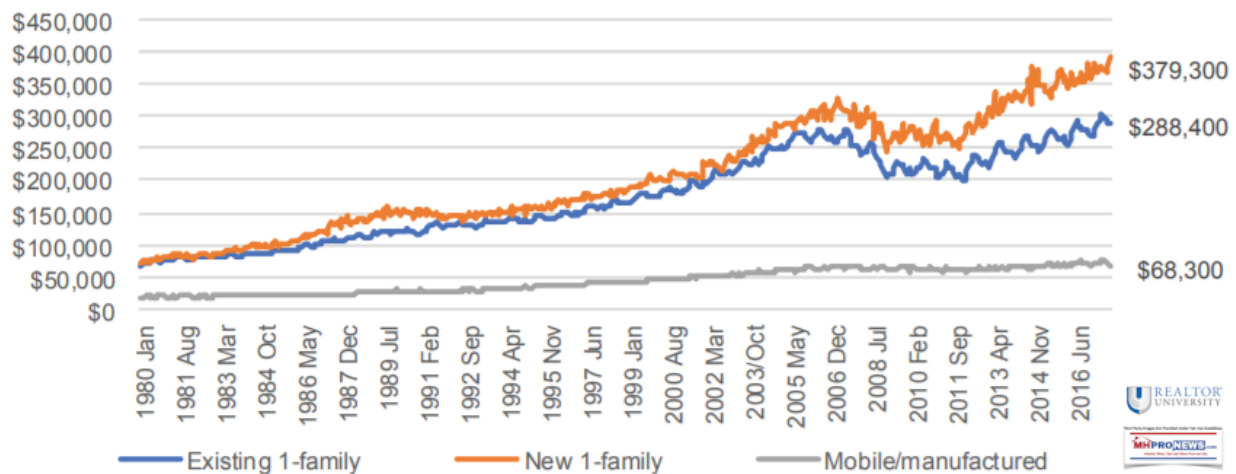
The first video interview posted on the MHARR website presaged that development, see that video at the [link here](#). It is near the top right part of the page and can be expanded to full screen viewing.



<http://www.MHProNews.com/blogs/daily-business-news/harvards-joint-center-for-housing-studies-2018-affordability-manufactured-homes-and-modular-housing-report/>

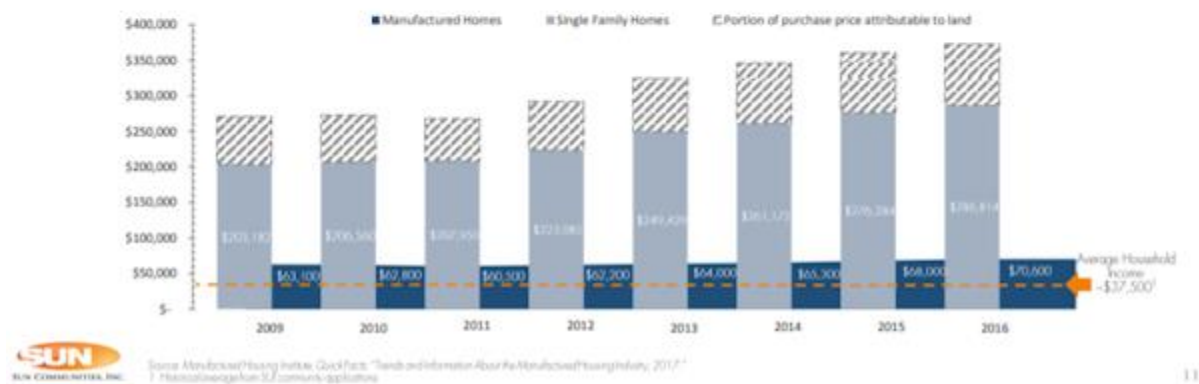
Consider a few screen-captures from NAR, other third parties as cited, and/or our own research work.

Figure 5: Average Price of Existing, New, and Mobile/Manufactured Homes as of October 2017



MANUFACTURED HOUSING VS. SINGLE FAMILY

- Sun's communities offer affordable options in attractive locations.

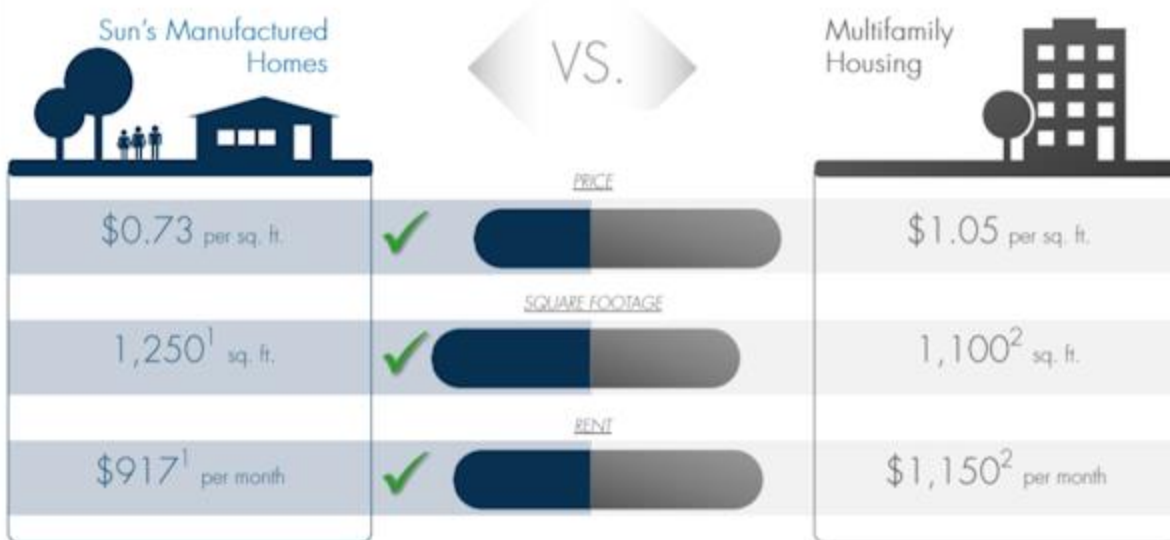


Sun is not the least expensive manufactured home community operator. Yet, even with more aggressive rates, they are still well below conventional housing.

MANUFACTURED HOUSING VS. MULTIFAMILY



- Sun's manufactured homes provide nearly 15% more space at over 30% less cost per square foot



1. Source: Company information
2. Source: The Multifamily Network. Represents average rent for a 2 bedroom apartment in major metropolitan areas for apartment selected for reference as of December, 2017.

10

Secretary Carson has written recently about multifamily housing. But has he been made aware of the fact that manufactured homes can be multiple level, or could be arrayed as denser housing that saves even more money?

<http://www.MHProNews.com/blogs/daily-business-news/reaching-for-the-sky-multiple-level-hud-code-manufactured-homes/>



The concepts below and above would likely need to be adapted, but reflect how this has been done, and could be done even better today.



Or has Secretary Carson and HUD been approached recently about a plan MHARR advanced for years, certainly by the 1990s? Namely, removable chassis on the manufactured homes? Recycling chassis would make HUD Code manufactured homes an even lower profile than they currently are. It would save money, and be greener. It would HUD Code manufactured homes even more undisguisable from conventional housing in many cases. But they would still be at a price that the U.S. Census Bureau says would be half-the-cost of conventional construction.

HUD Code manufactured home builders have told us that they could ramp up rapidly, given the right regulatory and financing environments. Investors want the maximum certainty. The story [linked here](#) and below is a reminder of what was once done, and could therefore be done again.



But instead of providing more affordable housing, municipalities are often unjustly targeting manufactured homes.

<http://www.MHProNews.com/blogs/daily-business-news/equal-justice-citizen-power-and-manufactured-housing/>

Here's a very recent case. Where was MHI? We notified them in advance. Still, nada.

<http://www.MHProNews.com/blogs/daily-business-news/rumble-over-anti-mh-law-state-association-manufactured-housing-institute-mhi-clayton-homes-and-mharr/>

A federal official told *MHProNews* about the inner workings of HUD, how it is used as a cash cow.

"The System Is Rigged," Federal Official's Description of HUD, Industry Reactions

<http://www.MHProNews.com/blogs/daily-business-news/the-system-is-rigged-federal-officials-description-of-hud-industry-reactions/>

"The System Is Rigged," Federal Official's Description of HUD, Industry Reactions



August 19th, 2017



soheyla



Comments off



Among the thousands of daily readers, *MHProNews* software indicates that hundreds of public officials are among those professionals who routinely logon. While the specifics of who those visitors are isn't known, *Webalizer* detects .gov, .mil, and .edu – along with numerous other such extensions.

A federal official called *MHProNews* recently.

In a conversation, that person referred to HUD as a huge conduit to "**channel money**" into "**various areas**," with "**several cottage industries**" that had grown up to tap into those funds.

The above isn't new. But it is a reminder of why and how special interest groups have manipulated the housing market for years, at the local, state, and federal levels.

The time to redirect the use of public funds, saving taxpayers money, and give millions of Americans the opportunity for the American dream is long overdue. The report below was published during the Obama Administration. Will the Trump Administration hopefully do better?



Comparisons can be very useful in understanding the dynamics of manufactured housing. The report below makes statistical comparisons to the RV industry.

<http://www.MHProNews.com/blogs/daily-business-news/what-rv-industrys-2018-prior-results-reveal-for-manufactured-housing/>

What RV Industry's 2018, Prior Results Reveal for Manufactured Housing

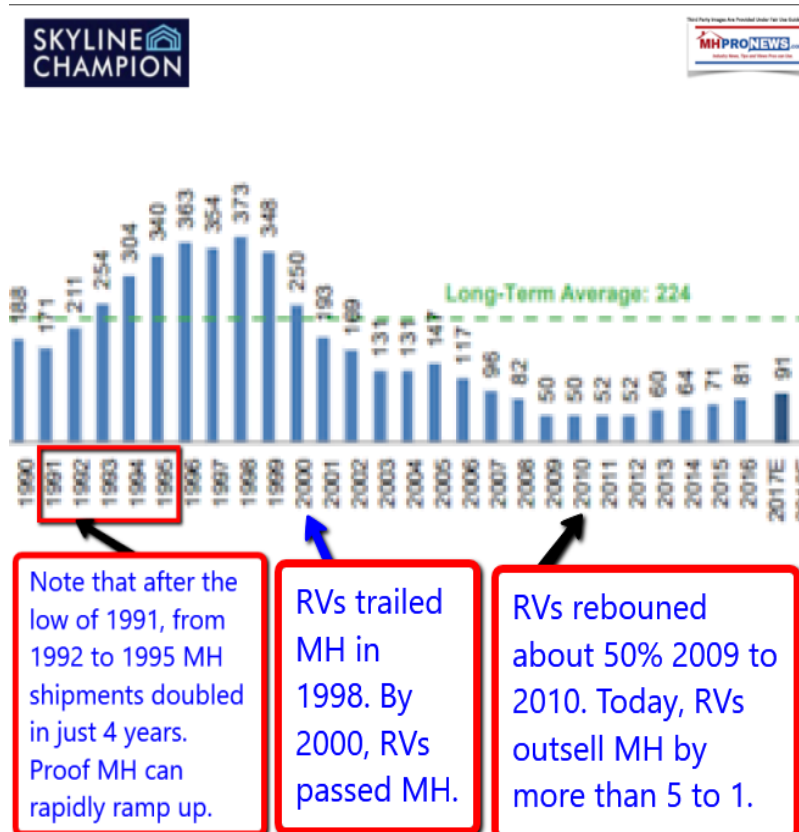
August 10th, 2018 soheyla

Comments off

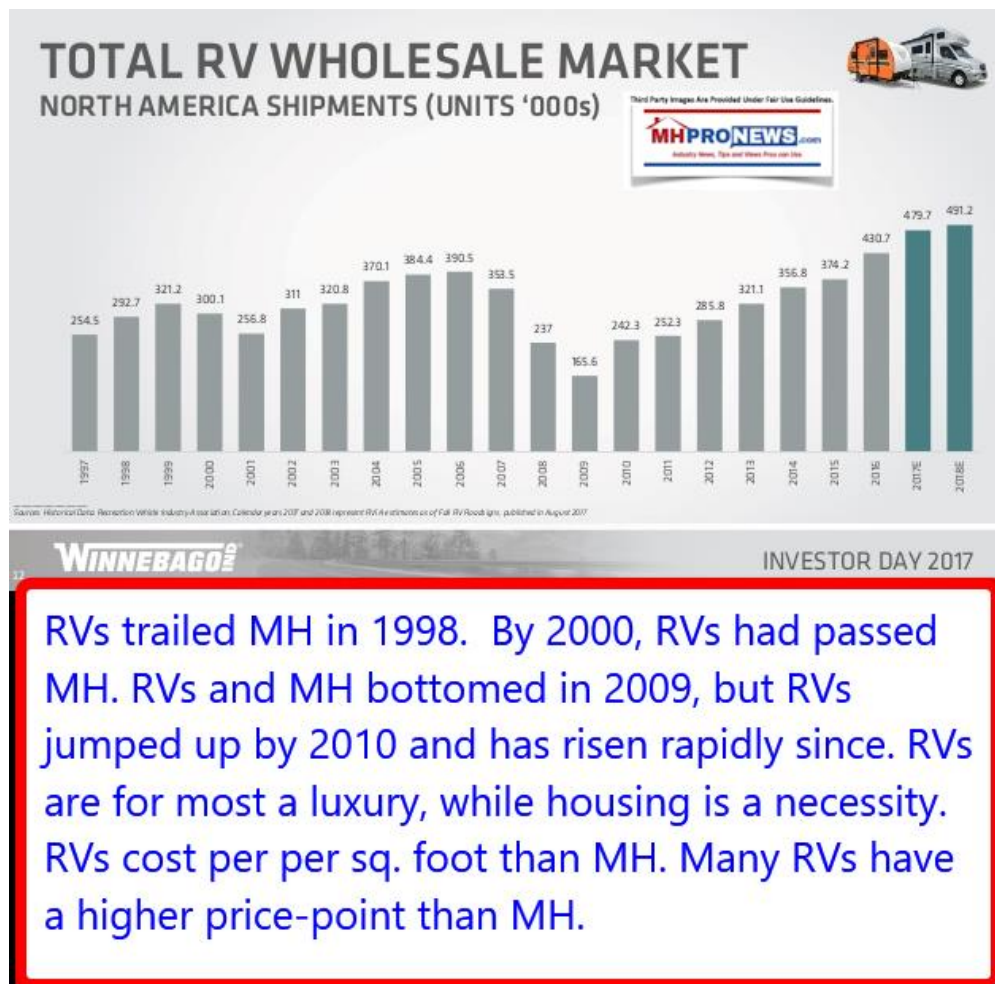
Tweet



Some of the key facts are captured in the graphics shown below.



While manufactured housing shrunk, RVs continued to rise.





Manufactured home communities have been closing at a faster pace that they have been opening for years. That's bad news for affordable housing advocates. It is also indicative of how aggressive some jurisdictions and special interests have been at eliminating a proven option for affordable housing.

<http://www.MHProNews.com/blogs/daily-business-news/hundreds-of-new-manufactured-home-communities-opened-but-how-many-have-closed-industry-research-result/>

The reasons for those closures are many. **"It's complicated."**

<http://www.MHProNews.com/blogs/daily-business-news/frank-rolfe-manufactured-homes-and-communities-industry-politics-its-complicated/>

Part of it is politics.

<http://www.MHProNews.com/blogs/daily-business-news/nathan-smith-ssk-communities-from-mobile-home-resident-to-manufactured-home-communities-owner-manufactured-housing-institute-leader/>

Some of it is related to media perceptions, and local policies. Those policies are routinely backed by special interests.

<http://www.MHProNews.com/blogs/daily-business-news/enemies-of-manufactured-homes-communities-rent-control-mhaction-george-soros-ignorance-entropy/>

<http://www.MHProNews.com/blogs/daily-business-news/towns-stance-against-mobile-homes-caused-division-uncertainty-mh-association-reacts-video-report/>

<http://www.MHProNews.com/blogs/daily-business-news/unconstitutional-taking-gentrification-on-trial-in-recent-oak-hill-manufactured-home-community-ruling/>

<http://www.MHProNews.com/blogs/daily-business-news/manufactured-home-community-owners-lost-troubling-creekside-appeals-case/>

Certainly, the industry is struggling under the weight of a lack of [an effective post-production association](#).

The interests of multibillion-dollar operations in non-HUD Code factory home building is doubtlessly an emerging factor.

<http://www.MHProNews.com/blogs/daily-business-news/300-billion-market-as-predicted-jeff-bezos-amazon-alexa-fund-dives-deeper-into-prefab-homes/>

We've noted the problem of monopoly/oligopoly numerous times in *MHProNews* as a challenge for the nation as a whole. But the Trump Administration has signaled that it could be diving into the problems caused by monopolies after the midterms. If so, then it should include manufactured housing. That would be good news to thousands of manufactured housing industry professionals, and to the public at large, which would gain benefits from having more competition and opportunities.



IV) Closing Summary and Thoughts, Related Recommendations, and Next Steps

MHProNews has suggested that the new administrator for the HUD Code manufactured housing program ought to be someone with the kinds of insights and qualifications that Vic De Rose, J.D., has. He was the

consensus candidate prior to Pam Danner's selection. Given the industry's special interests efforts, isn't it prudent to turn to Vic DeRose now, to replace Danner?

The Honorable Shaun Donovan
Secretary
U.S. Department of Housing and Urban Development
451 Seventh St, SW
Washington, D.C. 20410

MHI and MHARR "agreed" upon Vic DeRose. Then, Pam Danner was injected into the process. Why?

Dear Secretary Donovan:

I am writing to recommend Victor DeRose for the position of Administrator of the Federal Manufactured Housing Program (FMHP). Mr. DeRose is an accomplished executive of small and medium-sized manufacturing companies, and his experience illustrates his capacity to effectively fulfill the responsibilities of Administrator.

Mr. DeRose, a native Hoosier, began his career in the manufacturing industry as President, CEO and General Counsel to DeRose Industries, a leading producer of manufactured homes. Mr. DeRose went on to serve as President and CEO of other leading companies, such as Gulf Stream Coach, while also leading his own business law and consulting firm.

With over thirty-four years of experience in manufacturing, Mr. DeRose is a proven leader with an impressive range of industry knowledge. His work as an attorney, coupled with his past experience as President and CEO of private companies, make him a well-qualified candidate to lead the Manufactured Housing Program.

Mr. DeRose has demonstrated his capability to contribute to the decision-making process at the highest levels of the Department of Housing and Urban Development. I encourage you to favorably consider Mr. DeRose's application to serve as the Administrator of the FMHP.

Sincerely,


Joe Donnelly
United States Senator



Secretary Carson said the regulations that had been unduly imposed upon manufactured housing by Pam Danner were "**ridiculous**," an apt description. I couldn't agree more.

Perhaps the best summary for why AFFH and the existing laws with respect to manufactured housing could speed the implementation of proven solutions is found in the article linked below.



Henry Thoreau's quote, with the collage of HUD Code manufactured homes produced by a variety of builders is a reminder that manufactured housing is the solution that is hiding in plain sight.

“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, in *Walden*, per Goodreads.

A team of HUD objective, open-minded researchers should be assigned to study this issue. That should include visits to independently owned communities, producers, and retailers.

On this date, there is no known permanent housing alternative that is more cost effective than contemporary manufactured homes. Given that HUD is the primary regulator, and the MHIA of 2000 federal law mandates this, it ought to be implemented as rapidly as possible.

Implementing:

- existing laws,
- education of the stakeholders on the issues,
- debunking the fears that stoke NIMBY
- could rapidly yield some \$2 trillion a year in more GDP.
- It would lead to more housing opportunities, that could create [more wealth for home owners](#).
- It would bring to fruition the aspirations of entrepreneurs like Donald Tye's parents.
- Over time, it would reduce federal budgets.

There's more, but my time on this is done for now. Please feel free to reach out for any specific thoughts or questions.

Kindly consider the other interviews, special reports, and video interviews from [MHLivingNews](#) as well. The more these issues are objectively studied, the more it will become clear that the solution to the challenges of AFFH and for the affordable housing crisis can be found in modern manufactured homes.

Respectfully submitted.

L. A. 'Tony' Kovach

Managing Member

LifeStyle Factory Homes, LLC

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Connect on LinkedIn:

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

+++

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



"The manufactured home industry will achieve its great potential by addressing and resolving the causes of its core perception issues."

- L. A. 'Tony' Kovach,
#1 Manufactured Housing Industry
Trade Publisher, Award-Winning Industry expert and consultant.





**"Factory built cars.
Factory crafted clothing.
Factory made appliances and electronics.
Factory made cells, smart phones, tablets, and computers.
Factory crafted homes...it just follows, doesn't it?"©**



– L.A. "Tony" Kovach
Publisher of **MHLivingNews.com** and **MHProNews.com**,
Award-winning Industry Consultant, Professional Services Provider

<http://www.MHProNews.com/blogs/daily-business-news/manufactured-homes-hud-called-to-affirmatively-furthering-fair-housing-affh-remove-zoning-placement-and-consumer-financing-barriers-to-manufactured-housing/>