

**MHProNews** fact check, analysis and commentary of Blogger George F. Allen at this [link here](#). The search was for “enhanced preemption” using Allen’s website search tool. The most recent results are **highlighted in yellow** below by MHProNews and are found in his three posts shown below, which range from 4.10.2011 to 12.1.2016.

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**December 1, 2016**

## **New Year Resolutions for 2017 & Much More!**

Filed under: [Uncategorized](#) — George Allen @ 8:38 am

Blog # 423 Copyright 2016 COBA7® 4 December 2016; community-investor.com

Perspective. ‘Land-lease communities, previously manufactured home communities, & ‘mobile home parks’, comprise the real estate component of manufactured housing.’

This blog posing is the sole national advocacy voice, official ombudsman & historian, research report & online communication media for North American LLCommunities!’

To input this blog &/or affiliate with Community Owners (7 Part) Business Alliance® a.k.a. COBA7®, use Official MHIndustry HOTLINE: (8777) MFD-HSNG or 633-4764.

COBA7® Motto: ‘U Support US & WE Serve U!’ Goal of its’ print/online media = to ‘Not only inform & opine, but transform & improve MHBusiness model performance!’

INTRODUCTION. Hang on! This is going to be a three part ride through 1) planning for the year 2017; 2) bracing for the coming ‘continued regulation’ vs. ‘deregulation’ of manufactured housing; and, 3) triple opportunity for specialized personal and professional education in Louisville, KY., on 17 January 2017. Ready? Well, here goes...

I.

What Are Your New Year Resolutions?

Year 2017 is but a few weeks away, making this the ideal time to reflect upon, and articulate, New Year Resolutions to guide one’s thinking and actions during the next 12 months. And year 2017 is

poignant ('biting, painfully acute'), as we move deeper into the '17 year paradigm shift' we've endured since year 2000. The difference this year? Since we know we're well within a NEW ERA for this industry and its real estate asset class, land-lease communities (a.k.a. 'New Breed of MHRetailer & Lender'), why not reflect the changes, to respective business models to date, in the New Year Resolutions identified and codified? For starters, here's the way I see them:

- Support the new President of the United States of America!
- HUD-Code housing manufacturers to redouble efforts to market and sell new homes into land-lease communities, large & small, coast-to-coast! Part of this will require manufacturers to teach LLCcommunity owners/operators how to specify, order, install, market, sell, affordably price, and seller-finance homes they buy from factories.
- Land-lease community owners/operators to NOT heed the siren call to 'double one's rental homesite rates' during 2017; but rather, offer fair and affordable housing propositions, i.e. Where possible, keeping combined monthly PITI mortgage & site rent payment 'together', at or below the National Average Affordable Housing Market Rent of \$849/unit - including household expenses where possible. Of course, this will not work in some high-priced local housing markets.
- Emphasize importance of - and provide opportunities to receive, professional property management training & certification, for all on-site land-lease community managers overseeing 75 or more rental homesites. Everyone to be a Certified Property Manager, Accredited Community Manager, or Manufactured Housing Manager.
- Support one or more national advocacy entities who best represent one's business interests as housing manufacturers or land-lease community owners/operators, within and outside Washington, DC.
- And what other one(s) might be added to this august 2017 list? (317) 346-7156.

II.

Manufactured Housing Faces Another Fork in the Road?!

Last Week You Learned of the Imminent Danger of Manufactured Housing Going from being Affordable to Non-affordable

&

Now, This Weeks Message, Has to Do with Manufactured Housing, Maybe Going from being Regulated to Non-regulated!

Here goes...Chalk the following paragraph up to being rumor, truth, or mix thereof...

A few Fall seasons ago, HUD realized, as regulator of manufactured housing, it was not receiving enough income from label fees to cover expenses, so they (reportedly) sought relief from manufactured housing regulatory duties altogether. The Government Accounting Office ('GAO') interviewed HUD-Code home manufacturers to gauge their reaction(s) to the query, 'What if HUD went away?' At that point, 'the MHIndustry' stepped in surreptitiously (Did you ever read about that? I didn't.). Next thing we knew, there was a major increase in HUD inspection fees at all factories. And at that point, the 'threat' - or was it an 'opportunity', for deregulation, went away. And enhanced federal regulatory oversight began...recall how (2007) new home installation & dispute resolution legislation, moved quickly from back to front burner, during years 2015 & 2016.

Fast forward to today. The parties to the decades old MH regulatory brouhaha are:

U. S. Department of Housing & Urban Development or HUD. Relative to manufactured housing, the federal regulatory agency. An agency, until the recent presidential election, appeared hell bent on extending their oversight and enforcement reach into every corner of manufactured housing fabrication and land-lease community installation, including dispute resolution and its' minimal number of disputes to resolve..

Manufactured Housing Institute or MHI. Self-professed national advocate for all segments of the HUD-Code manufactured housing industry, including land-lease communities nationwide. Enjoys a reputation for being conciliatory, where regulatory matters are concerned. In large part responsible, since the mid-1970s, for turning the 'lemon' of HUD-Code housing regs into 'lemonade', as the turn of phrase goes, using the **federal preemption** nature of HUD's national building code to its advantage. Though some now question whether the industry's recent avoidance of deregulation might be akin to suffering from Stockholm Syndrome, i.e. empathizing with HUD regulators ('Its' captor'), versus seeking 'freedom from regulation' altogether.

Manufactured Housing Association for Regulatory Reform or MHARR. Since 1985, the manufactured housing industry's champion (a.k.a. The Washington watchdog!) for less federal regulation of the

factory-built housing product. Seemingly, a would-be champion of deregulation – unless they too fear the unknown consequences of free market enterprise, where the future of manufactured housing is concerned.

And therein lies the rub...

Will, under a new president with a penchant for less federal regulation of business and otherwise, the manufactured housing industry be faced with wholesale deregulation, similar to what was described – but did not come about, in the opening paragraph of this recitation? The quickest path to deregulation would appear to be: Press for bureaucratic change within HUD's present day manufactured housing program.

Or, will the manufactured housing industry be better served, by not 'rocking HUD's bureaucratic boat', in a quest for installing less regulatory-minded bureaucrats within HUD's manufactured housing program? Now there's a sensitive question begging a wise answer.

Hmm. Sounding like a 'Damned if you do & damned if you don't' scenario with each sequential paragraph...

What do you think? I, for one, would truly like to know. I'm conflicted. And frankly, nothing would please blog readers more, than to have elected leaders within MHI & MHARR, comment as to which course of action is best for the present and future of the manufactured housing industry:

- Unchanged HUD-Code regulation of home fabrication and new home installation
- Scaled back regulation of home fabrication and new home installation
- Complete deregulation of home fabrication and new home installation

What say YOU? Well, we distributed a DRAFT copy of this blog posting to several 'deep thinkers' in the MHBusiness. Here's one of the answers we received:

"Having received some advantages of HUD regulation, over local building codes, my money is continuing under HUD regulation, but with more representation/involvement by all segments of the MH industry – certainly not relying completely on either of the two current national lobbyists."

Interesting how this comment echoes MHARR's recent call for better national representation of all post-production segments of the MHIndustry, certainly better than what is evident today. So, one more reason to expect, during the weeks ahead a major announcement from the Community Owners (7 Part) Business Alliance, or COBA7, a division of GFA Management, Inc., dba PMN Publishing.

If you're not yet affiliated with COBA7, but would like to be, use the Official MHIndustry HOTLINE: (877) MFD-HSNG or 633-4764.

III.

Pre-Louisville MHShow, Day of Education!

January 17, 2017

Three Seminar Sessions Designed Especially for You!

All day, 17 January 2017, at the Crown Plaza Hotel on Phillips Lane, Louisville, KY., the Manufactured Housing Manager, or MHM, professional property management training & certification program. Taught by Katie Hauck, MHM, & Kathy Taylor, MHM. Cost? Only \$250.00 MHM candidate. No testing. Starts at 9AM and ends at 4PM. Tuition pays for copy of Landlease Community Management text, monograph of contemporary writings, as well as MHM certificate & MHM lapel pin. Register via [genevieve@roane.com](mailto:genevieve@roane.com) or phone (317) 346-7156.

Morning of 17 January 2017, at the Crown Plaza Hotel on Phillips Lane in Louisville, KY., George Allen, CPM & MHM will lead a three hour seminar (9AM-Noon) designed for HUD-Code home manufacturers who want to learn How to Identify Land-lease Communities in all four major segmentations of the realty asset class. Open discussion relative How to Best Market & Sell New HUD-Code Homes to this Emerging Market.

To register, phone (317) 346-7156. Cost? Only \$95.00 per registrant

Afternoon of 17 January 2017, at the Crown Plaza Hotel on Phillips Lane in Louisville, KY., Spencer Roane, MHM, will lead a three plus hour seminar (1PM - 4PM) introducing attendees to the basics and fine points of Lease-option Methodology, relative to seller-financing new and resale manufactured homes within land-lease communities. To register, contact [Genevieve@roane.com](mailto:Genevieve@roane.com) or phone (317) 346-7156. Cost? Only \$95.00 per registrant.

Then, stay over, and attend the Louisville MHShow, 18–20 January 2017.

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[Comments \(0\)](#)

**April 26, 2014**

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## **MHIndustry gets Ombudsman & MHARR an Open Letter!**

Filed under: [Uncategorized](#) — George Allen @ 4:18 am

Community–investor.com Blog # 294 Copyright 2014 27 April 2014

Perspective. ‘Land–lease–lifestyle communities, a.k.a. manufactured home communities cum ‘mobile home parks’, comprise the real estate component of manufactured housing.’

Roles of this blog. ‘It’s the national advocacy voice, ombudsman press\*, statistical research reporter, & communications resource for LLLCommunities in North America!’

How to input this blog & affiliate with Community Owners (7 Part) Business Alliance, a.k.a. COBA7, via Official MHIndustry HOTLINE: (877) MFD–HSNG or 633–4764.

\* Ombudsman press. ‘Non–government alliance handling complaints from the public.’

Introduction to this week’s community–investor.com blog posting...Part I. Finally, for the first time in manufactured housing industry history, we have an ombudsman (press) to field inquiries & complaints from homebuying customers, homeowner/rental homesite lessees in land–lease–lifestyle communities, and others! Part II. Just what it says, ‘An Open Letter to the...’ folk at the Manufactured Housing Association for Regulatory Reform. And Part III. Salient responses to one of the ‘Stories Not Posted’, but hinted at in last week’s blog. Whew! Another full plate of news and op/ed for you this week! And if you think this blog fare is ‘informative & compelling’, you should read the Allen Letter professional journal each month – along with Signature Series Resource Documents, or SSRDs, enclosed for affiliates of the Community Owners (7 part) Business Alliance! To subscribe (to the

newsletter alone) or affiliate with COBA7, simply phone the Official MHIndustry HOTLINE: (877) MFD-  
HSNG or 633-4764 today

I.

Ombudsman for the Manufactured Housing Industry!

II.

An Open Letter to the...

Manufactured Housing Association for Regulatory Reform, or

MHARR

III.

Responses to 'A Story Not Posted' but Described Last Week

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I,

Ombudsman for the Manufactured Housing Industry!

Didn't see this one coming, but probably should have....

"I've been in factory-built housing since 1970, & have frequently wondered: 'Why no national advocacy entity appoints, trains and sponsors an ombudsman to serve our industry's unique customer/resident mix, the 'manufactured home owner/rental homesite lessee'?' My opinion is, present day national advocacy bodies view themselves simply as lobbyists, not 'fixers' of industry problems, customer complaints and more.

(Hmm. Maybe if we'd had an ombudsman or two on board during the past seven decades, we wouldn't have suffered the image issues faced over the years through today)

In any event, since the Community Owners (7 Part) Business Alliance was launched mid-December 2013, it's fielded several inquiries and complaints from home owners/rental homesite lessees, land-

lease–lifestyle community (A.k.a. manufactured home community owners/operators, and just last week, one from an MH/RV product vendor, who asked:

“Are park model RVs specifically excluded or exempted from the HUD Code?”

COBA7’s answer, with assistance from a manufactured housing state association executive, involved sending this inquirer a copy of current HUD language contained in 42 USC 5402(6), addressing the size and configuration requirements of HUD Code ‘manufactured homes’. Inquiry handled!

With that said, this blog posting is “COBA7’s Public Announcement of an ombudsman (press) presence in behalf of our industry’s customers & residents, as well as businessmen & women, nationwide & throughout Canada!”

What’s an ombudsman or ombudsperson? The term is generally associated with ‘a public official...who investigates complaints by private citizens against government agencies or officials’; but also can refer to ‘...a similar person in a corporation or other organization’ and business alliance. Webster.

Introduction of an ombudsman (press) presence falls within the ‘Seventh Part or Function’ embraced by the Community Owners (7 Part) Business Alliance. Specifically, it’s the ‘National Advocacy, when need be...’ function; again, a presence long needed by manufactured housing/land–lease–lifestyle communities, nationwide and in Canada. And since COBA7 is NOT a formal, national or international, not for profit entity per se, but an alliance of businessmen and women from all segments of the manufactured housing industry and LLLCommunity asset class, a variant of ombudsman, or ombudsperson, is in order, to wit: ombudsman (press), i.e. Where industry ‘problems, inquiries & customer complaints’ will play out, if or when need be....

How to access the ombudsman (press)? Simple. Respond via host website: [community-investor.com](http://community-investor.com) &/or Official MHIndustry HOTLINE: (877) MFD–HSNG or 633–4764. Also (317) 346–7156, & Ombudsman c/o Box # 47024, Indianapolis, IN. 46247 USA.

How’s research and resolution ‘problems, inquiries 7 customer complaints’ to occur? While details will be worked out as this ombudsman (press) initiative unfolds, the plan is to receive and log same at COBA7, then reach out to allegedly involved parties, offering assistance, and suggesting private resolution of said matters; and where appropriate, conduct further investigation and or research into the matter – as was the case this past week.

If you're affiliated with COBA7, and would like to volunteer as an ombudsman or ombudsperson, let me know. Just like every other function, of the seven parts of COBA7, we're actively seeking volunteers to share the increasing workload of 1) writing articles for the Allen Letter professional journal, 2) updating the dozen Signature Series Resource Documents or SSRDs, 3) preparing a new edition of the Land Lease Lifestyle Community Management text, even 4) teaching future Manufactured Housing Manager® or MHM® professional property management training and certification classes. How to volunteer? Phone GFA at (317) 346-7156.

IMPORTANT REMINDER. Mark your calendar to participate in the 23rd annual International Networking Roundtable, 10-12 September 2014, at the DOLCE Conference Center in Peachtree City, GA. Highlights this year? Two historic (Because this hasn't been done before!) NATIONAL PUBLIC FORUMS, the morning of 11 September, re: 'Future of manufactured housing as 'housing' (Not 'trailers!)', & 'Future of land-lease-lifestyle communities as 'lifestyle' & 'investments' (Not 'trailer parks' & 'predatory \$ feeding grounds!'). PLUS 20 seminar sessions, eight superb networking venues, and copious deal-making opportunities. But know this: we market this superb educational, networking, and deal-making opportunity only to last year's attendees, COBA7 affiliates, and the '500 portfolio owners/operators' mailing list. SO, if YOU want an 'INVITE', but are not on one of those three data bases, you must let us know via the Official MHIndustry HOTLINE: (877) MFD-HSNG or 633-4764. Goal? 250+/- this year!

II.

An Open Letter to the...

Manufactured Housing Association for Regulatory Reform, or

MHARR

The following observations and comments are inspired by an MHARR Press Release dated April 15, 2014, titled: 'MHARR Advances Its' Final Push for Complete Implementation of the 2000 Reform Law'

To begin with, every businessman and woman whose career 'is' manufactured housing and or land-lease-lifestyle communities, should be very grateful to MHARR for the 'Washington, DC Watchdog' services and results they've provided, and continue to pursue in our nation's capitol! It is my opinion; we would not have the HUD-Code manufactured housing industry we enjoy today - despite the new

home shipment malaise since the turn of the century – if it wasn't for the work of this national advocacy body.

But with that said, and again in my opinion, there's much room for improvement in the agenda, focus, and very nature of their work as lobbyists. Let's begin with a simple and easy matter. How many reading these words are aware the '2000 Reform Law' referenced in the title of the aforementioned Press Release actually refers to the Manufactured Housing Improvement Act of 2000; and for some of us, abbreviated as MHIA@2000? Why begin an important recitation of a six bullet Action Plan for 2014, by 'cornfusing' readers with unclear terminology?

The six bullet points comprising MHARR's Action Plan going into 2014?

- Implementation of the Full Status & Functionality of the Manufactured Housing Consensus Committee or MHCC. This body hasn't met for nearly two years!
- Implementation of the New/Revised Subpart I. Here there needs to be more communication among parties within and outside HUD and the MHIndustry
- Implementation of New Energy Standards. Here the issue has to do with communication with the Department of Energy, and not being pre-empted by standards not reviewed for cost effectiveness.
- Implementation of **Enhanced Federal Preemption**. Past promises of program reviews and re-evaluation have not been kept, but are still needed.
- Implementation of Label Fee Increase. MHARR argued against implementation of 'an administrative notice-only system' that would contravene MHIA@2000, and take advantage of home manufacturers.
- Implementation of Proper Status of MH Program at HUD. Here the desire is to move the Title VI \$ program from Office of Risk Management, over to the Office of Single Family Housing in accords with MHIA@2000.

When and where have you, blog flogger (reader) had this sort of Washington 'insider' information brought to your attention, even in abbreviated fashion like this? Probably rarely or never! And that's the point. If you 'make your living' in this industry and via the LLLCommunity asset class, you owe it

to yourself to 'be informed'. To contact MHARR, phone (202) 783-4087. But don't expect to 'join up', as this national advocacy body accepts only HUD-Code home 'manufacturers' as members.

Which brings up the next, somewhat negative aspect of MHARR. There's a statement early in this Press Release that begs further discussion. It reads:

"the Association's outreach on consumer financing showing one of the main reasons for continuing discrimination against manufactured homes and homebuyers is the lingering perception of manufactured homes as 'trailers' - which the 2000 reform law was designed to end by completing the transition of manufactured homes to legitimate housing - it became evident renewed and intensified MHARR engagement with HUD on completing implementation of the 2000 reform law (i.e. 'MHIA@2000') is both warranted and necessary."

OK, that statement is fine, as far as it goes. The problem, in my opinion, is MHARR does NOT GO FAR ENOUGH! Out of one side of their mouth, so to speak, the association claims to desire to see HUD-Code manufactured housing 'complete the transition to legitimate housing' (presumably away from our 'trailer' vestigial heritage) - but only relative to their smaller 'manufacturer' perspective! And while they tacitly recognize (What they refer to as) post-production segments of the industry, they do little to fully understand, let alone cultivate support from these adrift folk, other than encourage their formation of a new, independent, national post-production advocacy presence in Washington, DC - or elsewhere.

For example, it's well known most state association executives routinely read MHARR's VIEWPOINT press. And many LLLCommunity owners/operators, as well as chattel finance lenders, and product/service vendors, regularly peruse The Journal, the Allen Letter professional journal, and Rishel Consulting's online newsletter, to learn 'the rest of the (manufactured housing) story' - according to MHARR. But all that's not enough. To be a true and effective industry leader takes 'more than just talk' - and writing, to achieve, maintain, and apply such status!

So, what's the answer? In my opinion, STOP (What appears to be) WORRYING about what any other national advocacy body might be doing, and focus on MHARR's agenda (like these six bullet points). Look what that did for you this Fall, where GSE Reform legislation language was concerned! In addition, make it a point to learn more about the nature and needs of the post-production segment of the manufactured housing industry, solicit their support, and become a timely and valuable resource to them - to the point of stepping out and publicly describing the 'Future of manufactured

housing as 'housing', NOT 'trailers'! Press Releases are Not Enough! However, if MHARR continues to run 'hot & cold', relative to post-production segments of the manufactured housing industry, it runs the real and serious risk of compromising its' present day reputation, integrity and value to the industry and realty asset class as a whole!

Think I jest? Here's what one owner (Not me) of several LLLCommunities has to say about MHARR and its' manufacturer members:

"Smaller community owners feel a kindred spirit with smaller MH manufacturers. We are both entrepreneurs, often small businessmen and women. We property owners appreciate the personal service and attention we receive from small manufacturers. We also appreciate the flexibility small manufacturers have in designing and building homes. Similarly, we also share grave concerns about dominance by larger manufacturers and LLLCommunity operators, along with their attitude that 'bigger must be better'. Lastly, we are especially sensitive to government regulations, red tape, and influence over our businesses and our lives."

And this from yet another Community Owners (7 Part) Business Alliance affiliate (Again, not me!):

"I think he's (Danny Ghorbani) very effective as a lobbyist for smaller home manufacturers – and to a big extent, the industry as a whole! However, the business model he's most familiar with is the independent (street) MHRetailer of the past. My concern is, so much of what the industry does today, and even more so tomorrow, is in the hands of manufacturers selling new homes directly to LLLCommunity owners, who in turn sell the homes to the public. He knows very little about this new business model, and what he refers to as the 'post production segments' of our industry. Getting involved in the Networking Roundtable and SECO Symposium this Fall would be excellent opportunities for MHARR to learn about these important segments of the industry – especially the many smaller LLCommunities." (lightly edited. GFA)

Bottom line MHARR?

- 1) Pursue the above-listed six bullet point agenda with vim and vigor!
- 2) Stop fretting over 'opposition within' (e.g. recent GAO interviews) as well as 'competition outside' (e.g. other building trade bodies) manufactured housing circles, and move ahead!

3) Learn all you can about the post production segments of the manufactured housing industry<sup>1</sup> And when need be, serve as their unofficial proxy, or ronin voice, inside the capitol beltway until....

4) In the end, MHARR will be a much more effective industry lobbyist in Washington, DC.

As usual, we solicit your response to this challenging and forward-thinking MOPHEAD\*

End Note. \* MOPHEAD is a 1980s era abbreviation for 'manufactured housing opinion/editorial', and metaphor for 'a tool used to mop up MHBBusiness messes'. MOPHEAD is from the time when I penned monthly columns for The Journal, and now defunct Manufactured Home Merchandiser magazines. Now you know....GFA

III.

Responses to 'a Story Not Posted' but Described Last Week

Relative to 'How Latter Day Mobe Dogs Eat Helpless & Hapless Gophers' non-story:

"Sliding Occupancy & Higher Rent - Oh What A Great (business) Suicide Route!" NB

"You must know the California land-lease-lifestyle community (A.k.a. manufactured home community) market very well, to pen what you did in your blog. Here's my take:

- California has (local) rent control
- California has high rental homesite rent rates, even for 40+ year old homes
- California has LLLCommunity owners/operators unwilling to upgrade their property's image, by not renewing leases on old homes and buying new ones.
- California politicians pander to take away property rights to give to others, e.g. bastion of 'feel good at others expense place' in the entire U.S.
- California LLLCommunity owners raised site rents during the 'Go Go days' for one reason: they could. In the end, they killed the independent (street) MHRetailer business, and affected homeowner/site lessees in different ways, per rent control.

- California 'chattel finance' has a hard time financing resale homes in LLLCommunities. Now that new home market is primed, will LLLCommunities participate?
- California LLLCommunity owners must take control of their property(ies) now, following seven years of idleness.

Interestingly, the non-story cited in last week's blog posting was NOT describing a LLLCommunity market survey re: California or Florida, but Michigan. Surprised?

And know what else we learned from this unpublished story? Who 'really reads' blog postings and who does not. It was so apparent when individuals started phoning and emailing, requesting FREE copies of the unidentified Market Survey. Conscientious LLLCommunity owners/operators want to know (Must know!) if their local housing markets are experiencing, e.g. 'declining occupancy AND rising rents', in order to take corrective or self-protective actions before business failure threatens or occurs. Did YOU request your FREE copy?

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[Comments \(0\)](#)

**April 10, 2011**

## **CONSPIRACY THEORISTS, 'Gather Ye Round!'**

Filed under: [Uncategorized](#) — George Allen @ 4:25 am

CONSPIRACY THEORISTS, GATHER YE AROUND!

Great & Greater Conspiracies; State of MHIndustry & LLCommunity Asset Class

Let's get something straight, right up front! Portions of what I pen here will anger a few individuals, but confirm the beliefs of many others. And it's this type industry news reporting & opinion sharing, that's prompted a scant number of salaried corporate & trade association executives – but interestingly – not sole proprietors & business owners, to get upset & holler, 'Harm to the industry!' Well, I think not. After 60 years of manufactured housing industry history; during 30 of which, I've

been invested in as a landlease community owner & industry consultant, it's high time we revisit our roots as affordable housing, seek new ways to rejuvenate our housing product, the way we market it, how we treat our customers, & much more! Frankly; if I don't speak out, I seriously doubt anyone else will, and our industry will continue to suffer on, maybe even die, in silence! GFA

I.

The Great Conspiracy isn't a conspiracy at all! It's the well known but embarrassing phenomenon of self - immolation (Webster: as in 'killing oneself - or industry - as a sacrificial victim'). In the case of manufactured housing, this self - defeating state of affairs is characterized by 'resistance to change' (e.g. Like automobile plants, we count our 'shipments', not homes 'sold', & cling to vestigial trade lingo like it's Biblical writ); greed (e.g. Think, 'Bigger boxes = bigger bucks!'); and, frequent lack of product (installation) responsibility (warranty) once the house leaves the factory (e.g. Remember 'DAR'? It's the industry's continuing mantra, in some circles, as in 'Drop (that house) And Run!'). And there's more. How 'bout cyclic short term abuses of chattel and realty finance sources, followed by reaping self - sacrificial long term consequences of going without (e.g. Only 50,000+/- new HUD Code homes 'shipped' during years 2008, 2009 & 2010)? Of course, there's also the perennial, not - so - private, lobbying - defeating, internecine squabbling between our national advocacy trade bodies inside the Washington, DC beltway. Will it ever end? Plus, landlease (nee manufactured home) communities are not without blame! Too many still deserve to be viewed as nothing more than 'trailer parks', awash with negative societal mores and perpetuating a very poor public image of an otherwise desirable, affordable lifestyle. And in the same breath, do we dare mention the nefarious (in some eyes) or business risk - mitigating (in other eyes) practice of 'churning' our (property owner) self - financed homeowner/rental homesite lessees? And the list goes on....

Is there a solution? I believe there is. But we need a charismatic, respected, well known, successful businessman or woman leader, to step forth and publicly announce, 'The HUD Code manufactured housing industry is at an impasse! And if we're to move forward together, and profitably, during the next decade, we've simply got to Get Our Act Together, the sooner the better!' Building on that proverbial line in the sand, this leader (We do have at least one, that I can know of, in this industry - but will he/she heed this call?) and cohorts, might consider following the twice set precedent of 2/27/2008 in Tampa, FL., & 2/27/2009 in Elkhart, IN., at two National State of the Asset Class ('NSAC') caucuses, by now calling for a two day Open Strategic Planning Meeting of businessmen and women 'with skin in the game (of their respective companies and associations)', committed to participate in this historic event at their own expense! Maybe require advance preparation on the part

of everyone attending. For example; early on, submit a short (500 words or less) letter, describing 'why' they're participating, and 'what' they'd like to see accomplished. Once responses have been collected, prepare and distribute a preliminary packet of information, containing industry benchmark statistics and brief summary of aforesaid input. Furthermore, such an event – to be effective – must be a joint effort between members of the Manufactured Housing Association for Regulatory Reform ('MHARR') & Manufactured Housing Institute ('MHI'), Open to non – member business owners who wish to attend! Ultimately, however, proceedings should be planned and guided, under the authority of an independent third party strategic planning meeting specialist, for event results to be accepted industry wide.

Are YOU one of the charismatic, respected, well known, successful businessmen and women leaders about whom I write and challenge in the foregoing paragraphs? Probably. This particular blog posting is being sent to those who fit the multifaceted description. Now 'the ball is in your court'. Your response?

The Greater Conspiracy is more difficult to pin down with specifics. In a big nutshell, it's generally described (Have no doubts about the fact the Greater Conspiracy exists, as it's a matter of discussion, within industry gatherings, from coast to coast, or I wouldn't be wasting blog space here!) as quiet collusion among some industry executives (i.e. Grass maybe perceived as being greener on the other side of the \_\_\_\_ fence); our competitors for national housing share (i.e. Not enough business to keep stick builders & factory – built aficionados employed over the long haul!); even regulators of our unique housing product type (i.e. We didn't ask for this added work in the first place!). Some of the symptoms are difficult to pigeonhole, as to whether part of the aforementioned Great Conspiracy or a Greater Conspiracy. So, let's begin with one recent example.

When MHIndustry & LLCommunity businessmen and women converged on Washington, DC. recently, they were given prepared 'talking points' to use when meeting with their respective members of Congress, relative to changing pending Dodd–Frank legislation. One recommendation read:

"Eliminate unrealistic methods for appraisal (of) manufactured housing. Site – built oriented appraisal requirements have little applicability to manufactured housing and ultimately penalize manufactured homeowners."

Who suggested that wording? NOTHING COULD BE FURTHER FROM THE TRUTH.

It's the continued use of traditional '(depreciating) book value' methodology that seriously harms manufactured home owners when selling their homes! Site - built housing's 'market comparable' appraisal methods are clearly applicable to manufactured housing, especially those sited on realty owned fee simple! So, who's at fault here, for perpetuating this just quoted mistruth? 'The industry' - who penned it (i.e. As another apt example of self - immolation, per the Great Conspiracy just described), and or the 'GSE's' (Government Sponsored Enterprises) who, year after year, opt for 'the easy way out', by endorsing 'depreciating book valuation' methodology to estimate the value of HUD Code manufactured housing - as part of this Greater Conspiracy, to eventually do away with our industry?

Furthermore, and in other arenas, who are/were major dissenters, when (past) attempts were effected to improve design and serviceability of HUD Code manufactured homes? Think 'removal of frames' from beneath HUD Code homes, as but one example. Then there're site - builder trade associations, afraid of lower - priced, factory - built competition taking (more) work from their carpenters. And who, until a recent U.S. Supreme Court decision declared 'black balling' of HUD Code manufactured housing from (home sale) multi - list systems across the country as being illegal, has effectively derailed the creation and nurturing of a functional secondary market for the listing and resale of manufactured housing product? It's one more reason we see so few licensed real estate salespersons and brokers pursuing listings within and outside landlease communities.

Know the clearest indicator of a Greater Conspiracy? In my opinion, it's HUD's abject failure to fully and properly implement key reform provisions of the Manufactured Housing Improvement Act of 2000 ('MHIA@2000')! Here we are, nearly 11 ½ years after passage of the Act, and HUD has all but neutered the federal regulation, without complying with relevant provisions within the Act; has diminished and ignored the **enhanced federal preemption** of MHIA@2000; has failed to appoint a non - career program administrator, per HUDs whim; has utilized the same federal contractor (Albeit under different entity names), for more than three decades (i.e. Talk about job security, at our industry's expense!); and, has re - codified two new MHIA@2000 programs - installation and dispute resolution - in the process, rendering them non - preemptive, and outside the authority of MHIA@2000's Manufactured Housing Consensus Committee ('MHCC'). Are you angry yet?

What to do about the Greater Conspiracy? Frankly, I don't think there's much we can do at this point in time, except... If we have folk within our industry, who have divided loyalties to our competitors and regulators, then they need to be confronted. But beyond that, the immediate, timely and strategic challenge, as described earlier, is to call for a national meeting of truly concerned

businessmen and women, willing to invest their personal and corporate resources to be an integral part of a national plan to rejuvenate, and reposition – if necessary, HUD Code manufactured housing! Are YOU one of those (hopefully) many individuals? If so, here're several things you can do TODAY:

- Make your views, on this matter, & personal availability known, to Joe Stegmeyer, chairman of MHI, via Thayer Long @ (703) 558-0678.
- Make your views, on this matter, & personal availability known, to John Bostick, chairman of MHARR, via Danny Ghorbani @ (202) 783-4087.
- Make your views, on this matter, & personal availability known, to me, via the MHIndustry HOTLINE: (877) MFD-HSNG or 633-4764 or gfa7156@aol.com
- Or, if you'd prefer to make your views known directly to either of the above board chairmen, let me know....

Continue to faithfully read this weekly blog posting for progress in combating the Great & Greater Conspiracies affecting the HUD Code manufactured housing industry.

DISCLAIMER. I am not one of the charismatic, respected, well known, successful business leaders of which I write in the previous paragraphs!

As I've said time and again, of late, I'm attempting to retire, but would be pleased to see the manufactured housing industry and landlease community real estate asset class rejuvenated, and at least on its' way back, to a new renaissance, like we enjoyed in 1998; but this time, without abusing our customers and financial resources. GFA

II.

I know I promised a State of the MHIndustry & LLCommunity Asset Class this week. Well, it's prepared, but requires the entire blog space; so once again, will not be included here. Perhaps I'll have to effect a special posting somewhere along the line.

III.

If you're reading this blog posting every week, but are not yet a paid subscriber of the Allen Letter professional journal, please consider doing so now. What are you missing? April's issue is headlined

by 'Something Old, Something New, Something Borrowed, Something Blue' – describing four measures for successfully filling vacant rental homesites in landlease communities! For the first time, there's (national) political commentary for your reading curiosity. Also, the only MH & LLCommunity 'stock watch' published anywhere in the industry/asset class, along with major rate indices for LLCommunity loans. And you've just gotta see Troy & Cheryl Brost's 'love letter' to their friends in the MHIndustry. Let me ask you this: 'Where else in the MHIndustry & LLCommunity asset class will you find 1) 13th annual National Registry of LLCommunity & Chattel Lenders; 2) 12th annual 'Who Ya Gonna Call During 2011?' list of freelance consultants; and 3) First published definitive description of Lease – Options, in the LLCommunity? Answer? Nowhere! And did I mention book reviews of LLCommunity owner Chuck Irion's Roadkill Cooking for Campers and Autograph Hell; plus, Glen Beck's The Overton Window (Read this and you'll not look at national events & trends the same, ever again.). To subscribe, phone (317) 346-7156 or via this website.

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**MHProNews fact check, analysis and commentary of Blogger George F. Allen at this [link here](#).**

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