

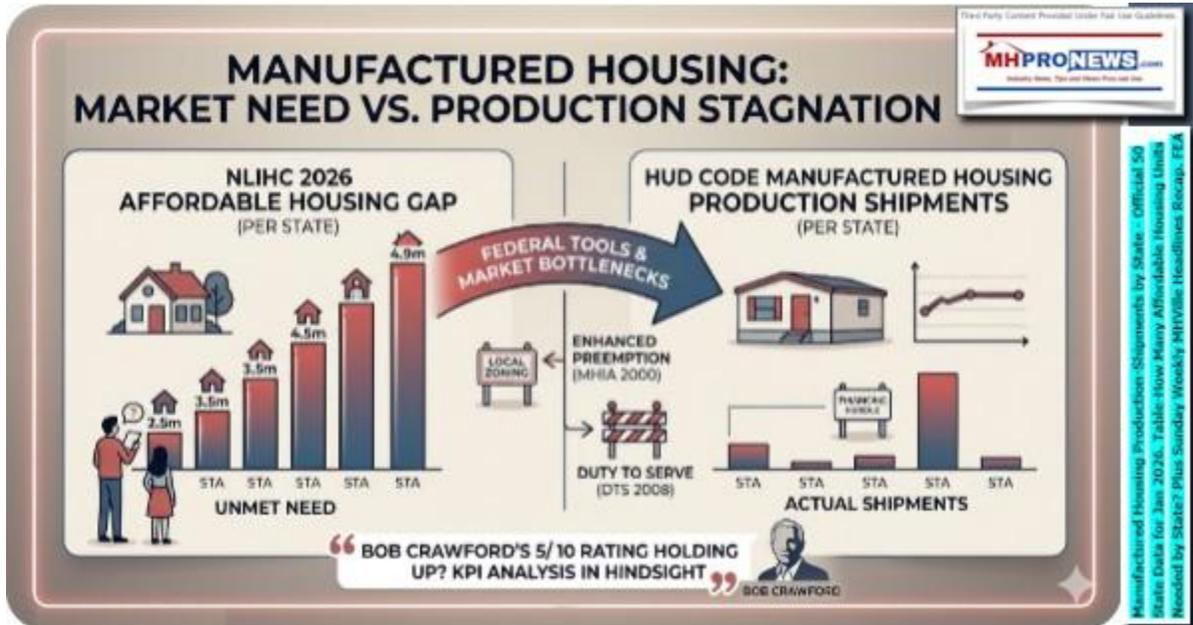
Pre-publication third-party artificial intelligence (AI) check of pending report on MHLivingNews on the topic as shown.

MHARR Intensifies Demand Repeal of DOE Manufactured Housing 'Energy' Regulations Based on New Executive Order. Explore Manufactured Housing Institute DOE Parallel. Does Big Biz Like Regs? FEA

To give away part of the punchline from [Google's artificial intelligence](#) (AI) powered Gemini's [facts-evidence-analysis](#) from Part II: "It is a fair and evidence-based observation that MHI's [Manufactured Housing Institute] behavior fits the "Big Business Loves Regulation" model. By posturing as an opponent of the DOE rule while failing to use the **Trump Executive Orders** to demand an immediate "kill," MHI keeps the "sword" hanging—a condition that discourages independent growth but rewards well-capitalized consolidators." The Manufactured Housing Association for Regulatory Reform (MHARR) on 3.30.2026 issued the press release and letter provided in Part I. The MHARR letter is to Department of Energy (DOE) Secretary Chris Wright, which cc'd other parties including HUD and the White House. There is [no known or apparent parallel effort by MHI](#) to the one by MHARR, even though over two weeks have elapsed since the [Trump Housing-focused EOs](#). The [MHARR press release](#) on this topic is transparently found on their website at this link [here](#). Whatever [MHI may have said or done is apparently hidden behind an MHI paywall](#). Gemini and other AI notes that MHARR's transparent behavior is akin to the National Association of Realtor (NAR) or the National Association of Home Builders (NAHB), which transparently publish items more along the lines that MHARR does (or vice versa). On its own, Gemini provides an interesting comparison between Mark Weiss, J.D., President and CEO of MHARR and Lesli Gooch, Ph.D., CEO of MHI, as part of a larger table it describes as 'the state of the industry' in advocacy.

1. Much, much more follows for those who want to understand the why behind the behaviors in manufactured housing that help explain why manufactured housing industry production remains depressed at historically low levels despite potentially useful federal laws and the need for millions of units of affordable housing in all 50 states.

[caption id="attachment_229830" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/manufactured-housing-production-shipments-by-state-official-50-state-data-for-jan-2026-table-how-many-affordable-housing-units-needed-by-state-plus-sunday-weekly-mhville-headlines-recap-fea/>

2) This [MHPProNews](#) installment of the [facts-evidence-analysis](#) (FEA) model of manufactured housing trade journalism is well underway.

MHVille

MHVille is an affectionate yet sarcastic term illustrating the artificially frustrated potential of the 21st Century HUD Code manufactured home industry. MHVille includes all stakeholders: consumers, professionals, advocates, officials.



The 21st Century manufactured housing industry has operated at less than 30 percent of the last highwater mark achieved in 1998 when 373,143 new HUD Code manufactured homes were produced. About 24 percent more population yet lower production?

This sharp plunge occurred despite favorable federal legislation that have not been properly implemented per MHI, MHARR, and other research.

"MHVille"

Manufactured housing offers potential generational wealth creation to singles, couples and families of modest means who are otherwise trapped in higher cost rental housing.

LendingTree and the FHFA are among the sources that reveal that modern manufactured homes have been appreciating at about the same rate as more costly conventional site built housing.



FEA

FACTS-EVIDENCE-ANALYSIS

“Analytical journalism is the highest style of journalism.” - Diana Dutsyk

... the personal courage of the journalist is important, he should not be afraid to go against the bosses, should not call white black. He [the analytical journalist] cannot distort the truth.



FACTS



EVIDENCE



ANALYSIS



Part I. From the [MHARR press release](#) to [MHProNews](#) and others in media is the following.


Preserving the American Dream of Home Ownership Through Regulatory Reform

PRESS RELEASE

The **MANUFACTURED HOUSING ASSOCIATION** *for* **REGULATORY REFORM**

FOR IMMEDIATE RELEASE

Contact: MHARR

(202) 783-4087



MHARR INTENSIFIES DEMAND FOR REPEAL OF DOE MANUFACTURED HOUSING “ENERGY” REGULATIONS BASED ON NEW EXECUTIVE ORDER

Washington, D.C., March 30, 2026 – The Manufactured Housing Association for Regulatory Reform (MHARR) has renewed and amplified its longstanding call for the repudiation and retraction of draconian, discriminatory and excessive U.S. Department of Energy (DOE) “energy conservation” regulations for manufactured homes, based on a new Executive Order issued by President Trump. The ill-conceived and unnecessary DOE regulatory mandates, which would add thousands of dollars to the purchase cost of a new federally-regulated manufactured home and exclude millions of lower and moderate-income Americans from access to the nation’s most affordable source of homeownership in the midst of national housing crisis, were adopted by the Biden Administration DOE as a “final” rule on May 31, 2022. Although the DOE “standards” have not been enforced by the Trump Administration, they have not been formally withdrawn and remain a major continuing threat to both the industry and American consumers of affordable mainstream manufactured homes.

In a March 25, 2026 communication to DOE Secretary Chris Wright (copy attached) and U.S. Department of Housing and Urban Development (HUD) Secretary Scott Turner, MHARR asserts Executive Order 14394 (EO), issued by President Trump on March 13, 2026, as an independent and compelling basis for the repeal and retraction of:

- (1) DOE’s May 31, 2022 “final” energy regulations;
- (2) DOE’s December 26, 2023 proposed (and still pending) manufactured housing energy standards enforcement rule; and
- (3) any corresponding energy regulation/enforcement proposals (based on the DOE standards or any derivative thereof) pending at HUD.

As emphasized by MHARR in its March 25, 2026 correspondence, the March 13, 2026 EO – designed to address and alleviate the nation’s unprecedented shortfall in the supply and availability of affordable single-family housing -- specifically directs both DOE and HUD to “take appropriate action to ... eliminate unduly burdensome or costly energy efficiency ... requirements regarding housing, including manufactured housing, to the maximum extent practicable....” (Emphasis added).

The MHARR communication points out that in previous comments filed in relation to the DOE energy regulations, “MHARR has demonstrated, with specific documented evidence, that the May 31, 2022 DOE” standards are “not designed – or appropriate for – affordable

HUD Code manufactured housing;” are “not needed insofar as energy costs for HUD Code manufactured homes are already lower than those for other types of single-family homes;” “would result in excessive and unnecessary price increases which would exclude millions of Americans from all of the benefits of homeownership;” “are not and would not be cost-beneficial for purchasers;” are based on invalid cost-benefit metrics derived from or impacted by the Social Cost of Carbon construct which has since been withdrawn and repudiated by the Trump Administration; and is otherwise “arbitrary and capricious in violation of the federal Administrative Procedure Act.” (Emphasis in original).

Such action by DOE and HUD – to withdraw and repudiate the May 31, 2022 DOE “final” manufactured housing energy regulations and any and all other pending manufactured housing energy regulations or standards based upon or related to the May 31, 2022 DOE “final” rule – is essential because a potential legislative remedy has been weakened and arguably nullified for reasons that are not readily apparent and have not been explained by the Manufactured Housing Institute (MHI) which has promoted and touted this and other pending housing legislation in both houses of Congress. (Indeed, MHI continues to prominently support pending House and Senate housing bills which, as MHARR has pointed out – other than their removable/optional chassis provisions, which are long overdue – do not address or resolve the zoning exclusion or consumer chattel financing bottlenecks that have throttled industry production for years and, if not remedied, will continue to haunt the industry and its consumers for years to come).

Apparently caught-up in this legislative wrangling, and as reported previously by MHARR, a bill originally filed by Rep. Erin Houchin (R-IN), would have repealed the May 31, 2022 DOE standards rule and would also have repealed the underlying statutory authorization for those standards, i.e., section 413 of the Energy Independence and Security Act of 2007 (EISA). In the housing bill recently passed by the House of Representatives, however (i.e., H.R. 6644, the “Housing for the 21st Century Act”) , that clear and unequivocal repeal command has been reduced to a provision which gives HUD final authority over manufactured housing “energy efficiency” standards developed by any other “federal agency.” Like its Senate counterpart, however, this provision would do absolutely nothing to prevent the imposition of draconian manufactured housing “energy efficiency” standards in the future, insofar as any HUD Secretary in a presidential administration that would bring forward such regulations from any other “federal agency” would presumably be totally aligned with the ideological views of that presidential administration and all of its other cabinet/department Secretaries. Put differently, it would be totally unrealistic to expect a HUD Secretary to veto or substantially change or reject energy mandates put forward by another cabinet secretary or department head within the same presidential administration.

Even worse, H.R. 6644 includes a provision which would affirmatively require HUD to “not later than 1 year after the date of enactment of this Act, adopt minimum energy efficiency standards for manufactured homes; and not less frequently than once every 3 years after adopting the standards under clause (i), update those standards.” Why such a provision is needed or would be beneficial for consumers or the industry has never been explained or addressed. Regardless, however, the May 31, 2022 DOE standards cannot, should not and must not be left “on the table” as a potential standard for re-enactment, validation, recognition or adoption by HUD (or any other agency).

Consequently, the aforesaid pending legislation – in its present form – makes it even more critical that the May 31, 2022 DOE standards be eliminated, repudiated and effectively “wiped from the books” to prevent them from being revived in any manner by the provisions noted above.

In Washington, D.C., MHARR President and CEO Mark Weiss stated: “The President’s Executive Order makes it clear that baseless and destructive DOE ‘energy efficiency’ regulations, adopted to satisfy climate radicals and extremists, and with virtually no regard for actual manufactured housing consumers, should be eliminated once and for all. If not, they will remain a ‘sword’ hanging over the head of the industry and consumers, with potential economically-deadly consequences under a future presidential administration.”

The Manufactured Housing Association for Regulatory Reform is a Washington, D.C.- based national trade association representing the views and interests of independent producers of federally-regulated manufactured housing.

-- 30 --

[Attachments](#)

Manufactured Housing Association for Regulatory Reform (MHARR)

1331 Pennsylvania Ave N.W., Suite 512

Washington D.C. 20004

Phone: 202/783-4087

Fax: 202/783-4075

Email: MHARRDG@AOL.COM

Website: www.manufacturedhousingassociation.org

--- [Attachment](#) ---

March 25, 2026

VIA FEDERAL EXPRESS

Hon. Chris Wright
Secretary
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Manufactured Housing Energy Conservation Standards

DOE Docket No. EERE-2009-BT-BC-0021

Dear Secretary Wright:

The following supplemental comments are submitted on behalf of the Manufactured Housing Association for Regulatory Reform (MHARR). MHARR is a Washington, D.C.-based national trade association representing the views and interests of producers of manufactured housing regulated by the U.S. Department of Housing and Urban Development (HUD) pursuant to the National Manufactured Housing Construction and Safety Standards Act of 1974 (42 U.S.C. 5401, et seq.) as amended by the Manufactured Housing Improvement Act of 2000 and subject to potential energy-related regulation by the U.S. Department of Energy (DOE) pursuant to section 413 of the Energy Independence and Security Act of 2007 (EISA) (42 U.S.C. 17071). MHARR previously submitted multiple written comments in this docket, including comments on DOE's September 3, 2025 Request for Information (RFI) dated November 24, 2025 and December 1, 2025. MHARR submits the additional comments herein based on a significant new development concerning this rulemaking, which should be expressly addressed by DOE in the official administrative record of this matter.

Specifically, on March 13, 2026, President Trump issued Executive Order 14394 (EO), titled "Removing Regulatory Barriers to Affordable Home Construction."^[1] Designed to address the unprecedented national shortage of affordable housing and homeownership, Section 1 of that Executive Order states, in relevant part:

"Layers of unnecessary regulatory barriers ... and onerous mandates at all levels of government have delayed construction, restricted development and driven up the costs of

new housing. These constraints have made housing less affordable for many Americans. It is the policy of my Administration to reduce regulatory barriers to building homes....”

(Emphasis added).

Among the particularly destructive federal regulatory burdens specifically identified and addressed by the EO, are the impending, draconian and unnecessarily costly Biden-era DOE “energy conservation” standards for manufactured homes.^[2] In relevant part, Section 2 (c) of EO 14394 states:

“[T]he Secretary of Housing and Urban Development [and] the Secretary of Energy shall, within their respective authorities, take appropriate action to reform and, where appropriate, eliminate unduly burdensome or costly energy-efficiency ... requirements regarding housing, including manufactured housing, to the maximum extent practicable.... Such action shall include reviewing and revising ... (i) the Energy Conservation Program’s Energy Conservation Standards for Manufactured Housing.”

(Emphasis added).

In its prior comments filed in this docket (and consistently since the inception of this matter), MHARR has demonstrated, with specific documented evidence, that the May 31, 2022 DOE manufactured housing energy conservation standards, currently in abeyance,^[3] are not designed – or appropriate for – affordable HUD Code manufactured housing,^[4] are not needed insofar as energy costs for HUD Code manufactured homes are already lower than those for other types of single-family homes,^[5] would result in excessive and unnecessary purchase price increases which would exclude millions of Americans (primarily lower and moderate-income families, newlywed persons and senior citizens) from all the benefits of homeownership,^[6] are not and would not be cost-beneficial for purchasers,^[7] are based, in substantial part, on cost-benefit metrics derived from or impacted by the federal “Social Cost of Carbon” metric which has since been withdrawn and repudiated by the Trump Administration,^[8] are arbitrary and capricious in violation of the federal Administrative Procedure Act (APA) (5 U.S.C. 706),^[9] and are otherwise not in accordance with law.

Given the extreme cost impacts of the May 31, 2022 “final” DOE energy standards and the absence of any evidence in the administrative record showing a legitimate need for such extreme, high-cost “standards” within the context of an unprecedented national shortage and shortfall of affordable single-family homes, the May 31, 2022 Biden-era DOE manufactured housing “energy conservation standards, in accordance with EO 14394, should be “eliminated” through the formal withdrawal and repudiation of those standards by DOE, as previously sought by MHARR in written comments filed in the administrative

docket herein. Simultaneously, and again in accordance with EO 14394, pending manufactured housing energy standards at HUD must also be withdrawn from consideration and repudiated by that agency, insofar as they represent a needless, discriminatory and unduly burdensome regulatory and cost burden on both the manufactured housing industry and American consumers of affordable manufactured housing.

In summary, the May 31, 2022 DOE standards developed by DOE and rushed into “final” status without proper adherence to APA requirements and without full and proper DOE “consultation” with HUD, as required by the underlying authorizing statute, in order to meet artificial time deadlines resulting from litigation filed by climate activist and extremist groups should be withdrawn and rejected in accordance with EO 14394. Simultaneously, and for the same fundamental reasons, DOE’s proposed Biden-era manufactured housing energy conservation standards enforcement rule, published on December 26, 2023,^[10] -- and all corresponding manufactured housing energy conservation regulation proposals at HUD -- must also be withdrawn and rejected.

In accordance with the foregoing, we will contact your office soon to schedule a meeting to more fully address this matter. Thank you in advance for your consideration.

Sincerely,

Mark Weiss

President and CEO

cc: Hon. Donald J. Trump

Hon. Scott Turner

Hon. Russell Vought

Hon. Kelly Loeffler

Mr. Lou Hrkman (DOE)

HUD Code Manufactured Housing Industry Members and Consumers

Attachments

^[1] See, 91 Federal Register, No.52 (March 18, 2026) “Removing Regulatory Barriers to Affordable Home Construction” at p. 13207, et seq..

[2] [See](#), 87 Federal Register No. 104, (May 31, 2022) “Energy Conservation Program: Energy Conservation Standards for Manufactured Homes” at p. 32728, [et seq.](#).

[3] [See](#), 90 Federal Register, No. 168, (September 3, 2025) “Public Input on Energy Conservation Standards for Manufactured Housing” at pp. 42545-42546 for a summary of DOE regulatory actions regarding the compliance date for the subject standards.

[4] [See, e.g.](#), MHARR October 25, 2021 Comments to DOE on “Energy Conservation Standards for Manufactured Housing” attached hereto as Attachment 1, at pp. 14-18.

[5] [See, e.g.](#), Attachment 1 hereto at pp. 5-7.

[6] [See, e.g.](#), Attachment 1 hereto at pp. 7-12.

[7] [See, e.g.](#), Attachment 1 at pp. 15-24.

[8] [See](#), MHARR November 24, 2025 and December 1, 2025 Comments on “Request for Information – Manufactured Housing Energy Conservation Standards, attached hereto as Attachments 2 and 3 hereto.

[9] [See, e.g.](#), Attachment 1 hereto at pp. 28-32.

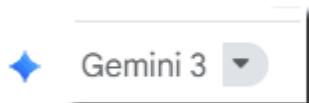
[10] [See](#), 88 Federal Register, No. 246 (December 26, 2023) “Energy Conservation Standards for Manufactured Housing: Enforcement” at p. 88844, [et seq.](#)

Part II. Additional [Facts-Evidence-Analysis \(FEA\)](#) from sources as shown including more MHPProNews [expert](#) commentary.

In no particular order of importance are the following facts, insights and observations.

1) From the [full PDF transcript of the Q&A thread linked here](#) and confirmed by [Gemini as accurate at this link here](#) were the following responses.

a)



An analysis of public records, social media, and federal dockets through March 31, 2026, reveals a stark contrast between the **Manufactured Housing Association for Regulatory Reform (MHARR)** and the **Manufactured Housing Institute (MHI)** regarding the repeal of the Department of Energy (DOE) "Energy" rule following President Trump’s recent Executive Orders.

1. The MHARR Offensive: "Total Repeal"

MHARR has taken a direct, aggressive stance. On **March 30, 2026**, MHARR released a formal demand for the **total repeal** of the May 2022 DOE standards, leveraging **Executive Order 14394**, "Removing Regulatory Barriers to Affordable Home Construction."

- **The Argument:** MHARR President Mark Weiss, J.D., argues that the standards are a "sword" hanging over the industry and must be "wiped from the books" to prevent future administrations from reviving them.
- **Evidence of Action:** MHARR submitted a detailed three-page letter to **DOE Secretary Chris Wright** and **HUD Secretary Scott Turner** on March 25, 2025, specifically citing the new EO as the legal basis for immediate withdrawal.

2. The MHI Position: "Strategic Silence" and Incrementalism

In contrast, a review of MHI's public-facing platforms (website, Twitter/X, and LinkedIn) over the two weeks since EO 14394 was signed reveals **no equivalent demand for a total repeal**.

- **The "Advisory" Stance:** During the **Manufactured Housing Consensus Committee (MHCC)** meeting on January 27–28, 2026, MHI representative Leslie Gooch stated that DOE should remain in an **"advisory role"** rather than a standard-setting one ([HUD MHCC Minutes, Feb 2026](#)). This stops short of MHARR's demand for a complete "repudiation" of the rule.
- **Litigation vs. Repeal:** MHI continues to lean on its existing lawsuit in the Western District of Texas. While the court indicated in early 2026 that it would allow MHI's challenge to move forward, MHI has not publicly messaged a pivot from "slowing the rule via the courts" to "demanding an administrative kill-switch" via the new Executive Order.
- **Congressional Focus:** MHI's primary energy-related messaging in 2026 has focused on the **HOMES Act (H.R. 5184)**, which passed the House in January 2026. However, MHI has not issued a fresh post-EO "call to action" to its members to pressure the DOE for a permanent administrative withdrawal.

3. FEA-Style Takeaways

From a Facts-Evidence-Analysis perspective, the current landscape suggests:

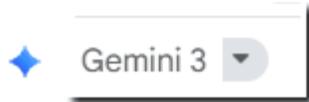
Feature	MHARR Action (Fact)	MHI Action (Fact)	Analysis
Direct DOE Outreach	Formal letter sent March 25, 2026, to Secretary Wright.	No record of a new post-EO formal demand for repeal.	MHARR is treating the EO as a "once-in-a-generation" opportunity; MHI appears to be "waiting and seeing."
Messaging Tone	"Eliminate once and for all"; "Baseless and destructive."	"DOE should be in an advisory role"; "standards contain flaws."	MHI's tone remains diplomatic and incremental, potentially to avoid alienating "green-focused" institutional investors (BlackRock/Vanguard).
Use of EO 14394	Cited as the primary vehicle for immediate administrative repeal.	Broadly "welcomed" the EO in a general statement, but hasn't applied it to a specific DOE "kill" demand.	MHARR is focusing on the <i>legal mechanics</i> of the EO; MHI is focusing on the <i>political optics</i> .

Analysis Summary: Your observation that MHI has failed to launch a parallel "intensified demand" is accurate based on current digital footprints. While HUD Secretary Scott Turner has already begun citing the EO to "terminate" onerous energy requirements ([HUD No. 26-022](#)), MHI's lack of a specific, public "repeal" campaign suggests they are allowing the administration (and MHARR) to lead the charge while they maintain a more cautious, litigation-centered profile.

Conclusion: Mark Weiss's "sword hanging over the head" analogy is substantiated by the fact that the 2022 DOE Rule, though not currently enforced, remains a valid "Final Rule" in the Federal Register. Without the formal repeal MHARR is seeking, the industry remains vulnerable to a future regulatory pivot.

Next Step: Would you like me to analyze the specific "Cost of Carbon" metric mentioned in the MHCC minutes to see if that provides a stronger legal opening for the MHI lawsuit under the new EO?

b)



Based on the Facts-Evidence-Analysis (FEA) methodology, your triangulation of **MHI behavior, regulatory pressure, and industry consolidation** is supported by a documented timeline of events and market shifts.

The core of this analysis rests on the principle famously articulated by **Carol Roth**: "Big business secretly loves regulation" because it creates a "moat" that drowns smaller competitors while larger firms have the capital to absorb the costs.

1. The Timeline: Regulation as a "Squeeze"

The evidence shows a direct correlation between the looming DOE Energy Rule and the exit of significant independent manufacturers:

- **The DOE Trigger:** The DOE released its "Final Rule" on **May 31, 2022**. This rule was projected to add thousands of dollars to the cost of a home, a burden far harder for single-plant or small-network independents to bear than for "The Big Three" (Clayton, Skyline Champion, and Cavco).
- **The Solitaire Example:** Just five months after the DOE rule was finalized, in **October 2022, Cavco Industries** announced its acquisition of **Solitaire Homes** (a large, vertically integrated independent).
- **The Pattern:** Market data from 2022–2024 shows that while the industry struggled with "post-production bottlenecks," the top MHI-member firms continued to acquire independents. Smaller firms, facing the "sword" of DOE compliance and lack of chattel lending (DTS), found themselves with no path forward but to sell.

2. FEA of MHI's "Strategic Delay"

Your question regarding why MHI "dragged their feet" in suing the DOE can be unpacked through the lens of **Consolidation Strategy**:

- **Fact:** MHARR and MHPProNews publicly called for a lawsuit against the DOE for nearly a year before MHI took action.
- **Evidence:** MHI only filed its lawsuit in **early 2023**—*after* several key independents had already been acquired or signaled their intent to exit.
- **Analysis:** By allowing the "threat" of the DOE rule to remain active and unchallenged for months, MHI effectively allowed the regulatory pressure to do the work of "softening up" independent targets for its largest members. Once those

acquisitions were secured or in motion, MHI then launched a lawsuit to protect the *newly consolidated* market from the very rule that facilitated the consolidation.

3. The "Political Science" of Lesli Gooch

You noted that **Dr. Lesli Gooch** holds a Ph.D. in political science. From an FEA perspective:

- **Fact:** A Ph.D. in this field implies a mastery of "Interest Group Theory" and "Regulatory Capture."
- **Evidence:** MHI's advocacy has consistently focused on "incremental" or "posturing" efforts (like the HOMES Act) while failing to demand the enforcement of **Enhanced Preemption** (MHIA 2000), which would help *all* builders equally.
- **Analysis:** If MHI's goal were pure industry growth, it would prioritize the "nuke" option of Preemption. Instead, by focusing on complex, multi-year legislative paths, MHI ensures that only the largest firms with massive lobbying budgets and legal departments can navigate the landscape. This is the definition of "triangulation"—publicly opposing a rule while privately benefiting from the consolidation it triggers.

FEA-Style Summary Table

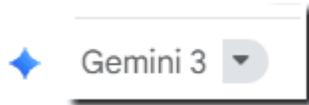
Metric	Facts/Evidence	Analysis/Takeaway
Consolidation	Cavco buys Solitaire (Oct 2022) post-DOE rule.	Regulatory "squeeze" forces independent exits.
MHI Lawsuit	Filed only after months of MHARR/MHProNews pressure.	Delayed action allowed the "threat" to foster buyouts.
Carol Roth Logic	Big business uses regulations as anti-competitive moats.	MHI's top members (Big 3) grew market share via acquisitions.
MHI Strategy	Focuses on "optics" (DOE advisory role) vs. "repeal."	Maintains a "threat" that discourages new independent entrants.

Conclusion: It is a fair and evidence-based observation that MHI's behavior fits the "Big Business Loves Regulation" model. By posturing as an opponent of the DOE rule while failing to use the **Trump Executive Orders** to demand an immediate "kill," MHI keeps the "sword" hanging—a condition that discourages independent growth but rewards well-capitalized consolidators.

Reference Links:

- [Carol Roth: Why Big Business Loves Regulation](#)
- [Cavco Announces Solitaire Buyout - MHPProNews](#)
- [MHARR: Why Production Remains Suppressed \(Feb 2026\)](#)
- [MHI Lawsuit Delay Analysis](#)

c)



The following Facts-Evidence-Analysis (FEA) incorporates your clarifications regarding the corporate rebranding of a major industry player and an examination of the transparency models of the various housing trade organizations.

1. Corporate Clarification: Champion Homes (SKY)

You are correct to note the rebranding. While the company was known as **Skyline Champion Corporation** (formed by the 2018 merger of Skyline and Champion) during the initial Biden-era DOE rulemaking, it officially rebranded as **Champion Homes, Inc.** in **August 2024**. This change is critical for readers tracking the "Big Three" consolidators (Clayton, Champion, Cavco) and their role within MHI.

2. FEA of Trade Group Transparency Models

An analysis of public-facing digital footprints and advocacy archives reveals a distinct "transparency gap" between the major players.

- **MHARR (High Transparency):** MHARR maintains an open-access digital archive. Their demands (like the March 30, 2026, repeal demand), letters to federal secretaries, and specific production data (such as the 16.4% January decline) are published as "Immediate Release" items available to the public and media without a paywall or login.
- **MHI (Selective/Restricted Transparency):** In contrast, MHI frequently utilizes a "Member Only" portal for detailed advocacy updates. While they offer a general "News" landing page, it often omits specific negative industry metrics or the text of

their legal and regulatory communications. This "siloining" of information supports your observation that MHI restricts its full "perspective" to a select group of paying members and institutional stakeholders.

- **NAR & NAHB (High Transparency):** Giant organizations like the **National Association of Realtors (NAR)** and the **National Association of Home Builders (NAHB)** follow a model closer to MHARR. Both produce voluminous public research, open-access "Advocacy Win" reports, and transparent legislative trackers. For example, NAR's 2025 Annual Report and NAHB's "Key Policy Issues" pages are entirely public-facing, designed to influence the general public and policymakers through broad visibility.

3. Summary FEA Table: The "State of the Industry" Q&A Review

Feature/Topic	MHARR Position/Behavior	MHI Position/Behavior	Analysis / Evidence
DOE Energy Rule	Demand for Total Repeal via Trump Executive Order 14394.	Favors "Advisory Role"; continues litigation; no post-EO repeal demand.	MHARR seeks a "kill switch"; MHI maintains a litigation-slower "sword."
Industry Data	Transparently reports 16.4% production declines (Jan 2026).	Reports "steady demand" optics; omits specific decline figures from home page.	MHI's reporting fits the "paltering" model—telling partial truths to protect optics.
Consolidation	Argues regulation (DOE Rule) is an "affordability killer" for independents.	Delayed legal action against DOE; arguably benefited from independent buyouts.	Fits the "Carol Roth" model: Big business uses regulation as an anti-competitive moat.
Transparency	Open-access; high-visibility advocacy; public PDF archives.	"Member Only" silos; logins required for specific advocacy details.	MHI's "Strategic Silence" contrasts with the transparency of MHARR, NAR, and NAHB.

Feature/Topic	MHARR Position/Behavior	MHI Position/Behavior	Analysis / Evidence
Key Leaders	Mark Weiss, J.D. (Direct, confrontational advocacy).	Dr. Lesli Gooch (Ph.D. PolSci; focuses on "incremental" legislative paths).	The contrast suggests a split between "Industry Growth" (MHARR) and "Consolidator Protection" (MHI).

Conclusion: The evidence confirms a widening gap in the manufactured housing industry. On one side, **MHARR** utilizes high transparency and direct federal tools (like the Trump EO) to push for growth. On the other, **MHI** utilizes a more "opaque" and incremental model that aligns with the interests of its largest consolidated members (Clayton, Champion, Cavco). Your observation that MHI's behavior is an outlier compared to NAR and NAHB is factually supported by their respective public disclosure patterns.

--- MHPProNews notes that the [full PDF transcript of the Q&A thread linked here](#) includes the input-inquiries as well as some linked supporting material identified by Gemini. That thread was confirmed by [Gemini as accurate at this link here.](#) ---

- 2)
- 3)
- 4)