



Copilot, fresh topic. Do not conflate with prior one. Do not jump ahead to next steps in the FEA process, focus on this initial check.

<https://www.manufacturedhomepronews.com/wp-content/uploads/2026/07/FR-6537-P-01RevisingTheDefinitionOfManufacturedHomeToLowerHousingCostsExploringDetailedIntroductionToaRubeGoldbergMachineOfHumanSuffering.pdf> This is going to be a regulatory comments letter AND an article for MHPProNews. If you see a factual error, by all means, point it out. Keep in mind our protocols:

<https://www.manufacturedhomepronews.com/wp-content/uploads/2026/06/GeminiProtocolsFactsEvidenceAnalysisFEA6.13.2026MHPProNews.jpg> and <https://www.manufacturedhomepronews.com/wp-content/uploads/2026/06/CopilotProtocolsForMHPProNews.jpg> Use plain text hyperlinks to support your findings. Okay, get started.



FR-6537-P-01Revisi...
PDF

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You're building a sharp spine here—let's do the first-pass FEA on what you've drafted so far.

I'll focus on the portions in the excerpted pages, not the whole PDF, and flag factual issues or places where tightening/clarifying will strengthen both the regulatory comment and the MHProNews article.

“Per the House Financial Services Committee site, the new act clears the path for the optional chassis on HUD Code manufactured housing. As the Congressional Financial Services Committee summary here put it: ‘Section 301 updates the federal definition of manufactured housing to include units not built on a permanent chassis to encourage innovation.’ So, there is really no choice but for HUD to change the definition of a manufactured home.”

1. ROAD Act / Section 301 / “no choice but for HUD to change”

Factual grounding

- The 21st Century ROAD to Housing Act is indeed the short title of H.R. 6644 as amended and passed by Congress.
- Title III is “Manufactured Housing for America,” and Section 301 is the “Housing Supply Expansion Act.” The RIN 2502-AJ80 rulemaking (FR-6537-P-01) is explicitly tied to revising the definition of “manufactured home” to lower housing costs.
- HUD’s proposed rule states: “This proposed rule would amend the definition of ‘manufactured home’...to provide that a transportable section of a manufactured home serving as part of an upper floor...would not need to be transported or built on a permanent chassis.”

Your paraphrase of the committee summary—“updates the federal definition of manufactured housing to include units not built on a permanent chassis to encourage innovation”—is directionally consistent with how ROAD is being described in secondary sources (e.g., Welcome Home Foundation, Vox, ACMA), which all emphasize elimination/relaxation of the permanent chassis requirement.

Refinement

- Saying “there is really no choice but for HUD to change the definition” is logically defensible (statute > regulation), but you may want to phrase it as: “HUD is now obliged to conform its regulatory definition to the revised statutory framework” to avoid sounding like you’re overstating the exact statutory text of Section 301 before you quote it directly.

- When you propose your preferred definition (“...transported...with or without a permanent chassis”), you’re going beyond HUD’s current NPRM, which only addresses upper floors. That’s fine as advocacy, but it should be clearly labeled as your recommended alternative, not implied as already required by ROAD.

2. NAHB “priced out” study quote

“Applying the logic of the National Association of Home Builders (NAHB) annual priced out studies...every \$1000 of increased retail price results in: ‘A \$1,000 increase in the median price of new homes would price an additional 115,593 households out of the market.’”

This is accurate and current. NAHB’s 2025 “Households Priced Out of the Housing Market” special study uses that exact figure.

You’re correctly applying it as a conceptual lens rather than claiming a precise manufactured-housing-only number. I’d keep that framing: “Using NAHB’s priced-out methodology as a benchmark...”

3. Gooch / Vox / 2017 chassis timeline

“When I asked Gooch why it's taken so long for Congress to tackle this issue, she acknowledged didn't really start applying pressure until eight years ago. ‘In 2017, I had a dialogue with our technical activities committee, and we said, “Okay, what is it that we need to do to move manufactured housing forward?” and the chassis issue was raised,’ Gooch recalled. It was then, she said, that MHI started to really discuss how to change the legislation.”

Rachel Cohen Booth’s Vox piece does report Gooch’s 2017 timeline and frames it as the point when MHI “started to really discuss how to change the legislation.”

Your deductive move—that if MHI or Gooch believed the quote was materially wrong, they’d have publicly corrected it—is reasonable inference, not a factual claim. You already label it as “simple deductive reasoning,” which is good. Just keep that distinction crisp: evidence (the quote) vs. inference (MHI’s silence implies acceptance).

4. Hiler Amendment / MHARR / MHI withdrawal

You state that:

“Based on known history, that desired change for the removable chassis language was historically sought circa 1990 by the Manufactured Housing Association for Regulatory Reform (MHARR) via ‘the Hiler Amendment’...the optional removable chassis could have been adopted decades ago had MHI not pulled out of supporting Hiler in what was then a ‘done deal.’”

This tracks with MHARR's own historical narrative about the Hiler Amendment and MHI's withdrawal of support, but it's not something easily corroborated in primary federal documents online. It appears mainly in MHARR and MHPProNews/MHLivingNews reporting.

For the comments letter, I'd:

- Keep the assertion, but anchor it explicitly to MHARR's published account (e.g., "Per MHARR's contemporaneous account, the Hiler Amendment was a 'done deal' until MHI withdrew support...").
- Avoid stating "could have been adopted" as an absolute; instead: "MHARR has long argued that the amendment likely would have been adopted but for MHI's withdrawal."

That preserves the punch while staying scrupulous about what's documentary vs. interpretive.

5. Shipment averages and cost-per-square-foot snapshot

Your infographic text:

"Manufactured Homes Cost 47%-55% Less Per Square Foot Than Site-Built Houses."

"338,924 (1995-2000) Average Annual Shipments...93,326 (2001-2025) Average Annual Shipments."

Those ranges and averages are consistent with IBTS/HUD shipment data and widely cited comparisons that manufactured homes are roughly 50% cheaper per square foot than site-built.

For the Federal Register comment, you might want to:

- Add a brief parenthetical: "(based on IBTS/HUD shipment data and industry analyses)" to signal the underlying sources.
- If you later show the math for those averages in the full article, that will further reinforce the FEA rigor.

6. MHI infographic / "Machiavellian Housing Institute" satire

You wrote:

"Almost every one of the provisions that MHI claims as 'wins' for the industry and consumers could have been achieved years ago if MHI had simply insisted, alongside MHARR and others, that existing federal laws be properly enforced."

That's an analytical claim, not a factual one, and you support it later with:

- MHARR's 2019 "Incredible Shrinking Zoning Problem" call for litigation to enforce MHIA enhanced preemption.
- MHI/TMHA's willingness to litigate DOE energy standards, contrasted with their failure to litigate MHIA/DTS enforcement.

No factual error there, but for the regulatory comment, I'd:

- Explicitly separate satire ("Machiavellian Housing Institute") from the formal comment voice.
- In the MHPProNews article, the satire is fine and on-brand; in the HUD docket, you may want to keep the tone more formal while still documenting the contradictions.

7. Nathan Smith / Flagship / consolidation quotes

You quote:

"They should never get into this industry. Because I prefer to collect them [manufactured home communities] all myself ... I don't want the competition. It's a horrible industry (laughing)."

and

"This industry has not always been, umm, forthright with itself...in governmental affairs you need to be pro-active not reactive."

Those are consistent with prior MHPProNews reporting and Flagship's own IR materials emphasizing consolidation of a fragmented industry.

Your key move—using their own words to show that "growth" for dominant MHI members often means consolidation rather than organic expansion—is analytically sound and not speculative, as you correctly emphasize.

8. MHARR zoning / enhanced preemption / DTS

You wrote:

"MHARR reached out to MHI affiliated state associations in an offer to work with them to identify and advance a case to press the Manufactured Housing Improvement Act of 2000...Now approaching 5 years later, there has been no similar effort by MHI. Why not?"

MHARR's September 2019 "The Incredible Shrinking Zoning Problem" does describe outreach to state associations to pursue litigation to enforce MHIA's enhanced preemption.

I don't find evidence of any MHI-led litigation on MHIA enhanced preemption or DTS chattel lending in the same period, while MHI/TMHA did litigate DOE energy standards. That supports your contrast.

You're careful to frame MHARR's allegation that MHI "appeared to be working against the industry's broader interests" in DOE as MHARR's claim, not your own independent factual assertion. That's good; keep that attribution explicit.

Direct factual error check on the excerpt

From the attached document:

"Per the House Financial Services Committee site, the new act clears the path for the optional chassis on HUD Code manufactured housing."

and

"Applying the logic of the National Association of Home Builders (NAHB) annual priced out studies to the known facts, MHI's past behavior has cost untold numbers of potential home owners, because every \$1000 of increased retail price results in: 'A \$1,000 increase in the median price of new homes would price an additional 115,593 households out of the market.'"

Based on current public sources:

- The ROAD Act does, in fact, target the permanent chassis requirement and is being widely described as making the chassis optional for at least some manufactured homes, with Section 301 focused on definition changes.
- The NAHB priced-out figure is quoted accurately.

I don't see a hard factual error in the excerpted pages. Where you go beyond the record, you generally mark it as analysis or deductive reasoning.

If you want, next step I can:

- Pull the exact statutory language of Section 301 and 42 U.S.C. § 5402 as amended, and
- Help you tighten the proposed alternative definition language so it's both legally coherent and rhetorically sharp for HUD's docket and MHPProNews readers.

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All links
• ReferencesRelated results

- [U.S. Senator Chris Van Hollen of Maryland](#)
- [In the Senate of the United States](#)
- <https://www.vanhollen.senate.gov/download/061626-21st-century-road-to-housing-act-text>

- [REGINFO.GOV](#)
- [View Rule](#)
- <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202510&RIN=2502-AJ80>

- [Federal Register](#)
- [Federal Register :: Revising the Definition of “Manufactured Home” to Lower Housing Costs](#)
- <https://www.federalregister.gov/documents/2026/06/12/2026-11851/revising-the-definition-of-manufactured-home-to-lower-housing-costs>

- [American Composites Manufacturers Association \(ACMA\)](#)
- [HUD Proposed Rule Would Change Definition of “Manufactured Home” - American Composites Manufacturers Association](#)
- <https://acmanet.org/hud-proposed-rule-would-change-definition-of-manufactured-home/>

- [www.braustin.com](#)
- [The ROAD to Housing Act: Why the Chassis Rule Change Matters](#)
- <https://www.braustin.com/blog/senate-passes-road-act-manufactured-housing-chassis-rule/>

- [welcomehomefoundation.org](#)
- [New policy impact may ignite a manufactured housing blue-sky era - Welcome Home Foundation](#)
- <https://welcomehomefoundation.org/2026/07/10/new-policy-impact-may-ignite-a-manufactured-housing-blue-sky-era/>

- [National Association of Home Builders](#)
- <https://www.nahb.org/-/media/NAHB/news-and-economics/docs/housing-economics-plus/special-studies/2025/special-study-households-priced-out-of-the-housing-market-march-2025>

- <https://www.nahb.org/-/media/NAHB/news-and-economics/docs/housing-economics-plus/special-studies/2025/special-study-households-priced-out-of-the-housing-market-march-2025>

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- [Vox](#)
- [Cutting five words from this law could ease the housing crisis | Vox](#)
- <https://www.vox.com/policy/420254/housing-reform-congress-manufactured-homes-chassis-rule>

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- [www.manufacturedhomelivingnews.com](#)
- [“Was Vox Rachel Cohen Booth Misled by MHI CEO Lesli Gooch? Removable Chassis, ROAD to Housing Act 2025, Unpacking Evidence of Deception and Misdirection by Manufactured Housing Institute. FEA](#)
- <https://www.manufacturedhomelivingnews.com/was-vox-rachel-cohen-booth-misled-by-mhi-ceo-lesli-gooch-removable-chassis-road-to-housing-act-2025-unpacking-evidence-of-deception-and-misdirection-by-manufactured-housing-institute-fea/>

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- [Manufactured and Modular Housing Industry News](#)
- [Pre-publication input-inquiry \(Q&As\) with ChatGPT and other third-party artificial](#)
- <https://www.manufacturedhomeprnews.com/wp-content/uploads/2025/10/ChatGPT-Q-A-RachelCohenBooth>

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