

United States House of Representatives
Committee on Financial Services
Subcommittee on Insurance, Housing and Community Opportunity
“The State of Manufactured Housing”

November 29, 2011
Danville Municipal Building
Danville, Virginia

Dear Chairperson Biggert:

We appreciate the courtesy extended by Vice Chairman Hurt in inviting the Manufactured Housing Association for Regulatory Reform (MHARR) to offer testimony at the November 29, 2011 hearing on “The State of Manufactured Housing” and to submit this written statement for the record.

MHARR is a national trade organization representing the views and interests of mostly smaller producers of manufactured housing regulated by the U.S. Department of Housing and Urban Development (HUD).

MHARR first requested an oversight hearing on the HUD manufactured housing program and was promised such a hearing by Chairman Bachus earlier this year.

MHARR specifically requested an oversight hearing on HUD’s failure to fully and properly implement key reform provisions of the Manufactured Housing Improvement Act of 2000. We made clear our wish to present testimony showing the devastating impact of that failure on the industry -- and particularly the smaller independent manufacturers that MHARR represents -- as well as American consumers of affordable housing, which would provide this committee with a basis

to seek answers from HUD officials and hold HUD accountable for complying with the law as it is written, going forward.

The smaller businesses represented by MHARR have major and specific grievances based on HUD's failure to fully and properly implement key reform provisions of this law designed to ensure that manufactured homes are treated as housing rather than "trailers"-- distorting some, ignoring others and effectively reading yet others out of the law entirely by process of "interpretation." This failure negatively impacts all aspects of the industry and the use and availability of manufactured homes, including the availability of financing for mostly lower and moderate-income home buyers. Yet, neither they nor the independent expert witnesses they identified for the Committee are here today because of changes to the venue and focus of the hearing.

Consequently, we trust that during the next session of the 112th Congress, a hearing on those specific issues involving HUD's implementation of the key reforms of the 2000 law will be held, where MHARR's small business and expert independent witnesses will have an opportunity to testify.

In the interim, we appreciate the inclusion of this statement in the official record of this hearing, together with the attached MHARR Fact Sheets which address, in brief, the most important 2000 law implementation issues which need to be addressed by Congress.

Thank you.

Danny D. Ghorbani
President
Manufactured Housing Association for Regulatory Reform

cc: Hon. Spencer Bachus
Hon. Robert Hurt

Attachment