

From: Kristen [wimhoa@charter.net]  
Sent: Monday, July 12, 2010 11:57 AM  
To: !FHFA REG-COMMENTS  
Subject: RIN2590-AA27: Proposed Rulemaking per H&ER Act 2008

Mr. Alfred M. Pollard  
General Counsel  
FHFA.gov

Re RIN2590-AA27 Dear Mr. Pollard:

I write regarding the impossibility of obtaining a loan, especially a federal loan, when requested by the owner or purchaser of a manufactured home that will reside in a community (park), rather than on privately owned land. We homeowners are forced to assume installment loans rather than a true mortgage because of bias in the financial market place. And your agency thus far refuses to address this problem, which ultimately impacts our homes by devaluing them along with every other facet of the industry.

Ownership of a manufactured home, especially in this economy, has become an albatross around our necks because we are stymied from selling, repairing, or refinancing.

Land acquisition is generally impossible for us due to cost, availability, and zoning in many counties and municipalities--another obstacle to getting federal financing for these homes. Thus, the federal government agencies automatically eliminate the majority of citizens who want or need federal financing by your own eligibility tenets.

Your rule-making to date ignores the need to open up the credit markets to mfd. homeowners, especially when these homes are located in "parks." As consumers, many of us had no other option except to site our homes in "parks" because of overt municipal discrimination that has existed for years.

Nor is your rule-making to date making it possible for groups of MH homeowners to convert to resident-owned communities by virtue of bundled financial packages facilitating group ownership of property. Federal government agencies refuse to recognize our homeowner needs for home value parity with all other housing that could be accomplished through group-community land purchases.

You may be unaware that the majority of mfd. homes purchased in the USA are ultimately relegated to siting in mobile home communities through no fault of the purchaser. This fact has been encoded by municipalities using zoning or covenant limitations to ghetto-ize mfd. housing and its buyers into "parks,"--the assumption being that mfd. housing is inferior to site-built homes and cannot be allowed in "respectable" communities. This is a pervasive problem, reinforced by federal agencies when your rule-making perpetuates it.

Siting mfd. housing in ghettos (parks) also illuminates the significant societal bias held by municipalities, the industry itself, and financing and insurance markets against mfd. housing. I'm restricted from purchasing a combined home/auto insurance package because I live in mfd. housing. I note that the industry has never made any attempt to rectify this discrimination in any way and most appear to enjoy jabbing their customers in the back while selling to their faces. This prejudice extrapolates to MH owners personally and continues unabated today in all facets of MH ownership.

I recommend to you the following websites: Homeowners Against Deficient Dwellings [www.HADD.com](http://www.hadd.com) <<http://www.hadd.com/>> , and that of Dr. Wes Johnson who has written a comprehensive book <http://www.manufacturedhomebuyers.com/housing%20links.htm> <<http://www.manufacturedhomebuyers.com/housing%20links.htm>> ] on the reality of MH ownership and its inherent problems. A good share of societal prejudice from all quarters can be blamed on the manufacturing industry itself for producing an inferior product and failing to provide reputable repair service to its buyers. Perhaps that is changing, but the prospect for significant improvement still eludes this housing and its buyers.

Therefore, I urge you and your agency to honestly delve into the true picture of what we MH homeowners are up against. If your agency doesn't lift the iron curtain of financial purgatory we buyers and owners have been in for years, the MH construction business may never rise from its economic doldrums--i.e., shuttered and closed businesses and jobs lost.

I would appreciate notification of your agency's ultimate decision.

Sincerely yours,

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