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To: !FHFA REG-COMMENTS
Cc: jboehlert@mfghome.org
Subject: RIN 2590-AA27

Dear FHFA officials.

Congress in its wisdom gave us the Duty to Serve provisions for manufactured housing financing. I live in a manufactured home in Sunset Village, Glenview IL. I can tell you first hand how important it is to have this sort of workable home only financing. We live in a home that looks and lives like a conventional house, it is less than 5 years old. We are in a neighborhood that is being updated and improved by the owners of the community. To make some area housing comparisons: to the south are condos 45 years old that sell for 3 times the price of the home we live in. To the north are townhouses that are less than 10 years old, they sell for 5 to 10 times the price of the home we live in. They have home owner association fees, we have site lease fees. We pay less in taxes and fees than they do. But they have a financing advantage that we do not have! FHFA regulations that would make the playing field level with conventional financing for conventional housing would make it easier for millions to buy and sell their manufactured homes.

Across the street from where my family lives are two story HUD Code homes. They are stylish, beautiful, safe and durable - it is required by federal law! Why should they - or we - have to suffer under financing terms that are unequal to conventional financing?

Let's not forget that manufactured housing is made in the USA! We need to protect and grow this vital job segment.

Sometimes officials say that manufactured housing loans 'don't perform as well' as conventional housing. In the aftermath of the sub-prime real estate meltdown, I'm not sure that is a valid argument any more. There are and will be households that don't make as much money as others, and they will be more vulnerable to economic issues. In other words, it isn't the house, it is a question of the income levels of those served. But if the government gave the same treatment to Manufactured Home owners that it has to those caught in the subprime mess, if MH owners had the same bail out programs and 'let's keep people in their homes' programs as those who get conventional financing, don't you think it would be easier and better for manufactured home owners too? Of course it would!

Equal treatment under the law! That is what manufactured housing deserves! The federal government regulates this industry and form of construction. Manufactured Housing is designed to perform the same as conventional housing, but at a lower cost, by the terms of the federal law known as the HUD Code. If you give unfair/preferential treatment in financing to 'conventional housing,' you are penalizing some 20 million manufactured home owners and the millions more who could or would buy if the homes had absolutely equal footing in financing.

You can't discriminate against races, religions, ethnic groups and a host of other groups. Why should the federal government tolerate any type of discrimination against a housing type it regulates?

I'm asking you to level the playing field for manufactured home owners and residents like myself.

I would observe that modern manufactured housing compared to conventional building - according to insurance and other studies I've seen - is as more energy efficient, as or more safe against a fire, lower maintenance costs, etc. Even if these home loans didn't perform as well, think about the billions of dollars the economy saves in the cost of buying and owning these homes!

Finally, and a topic I don't here mentioned often. If people can't buy manufactured housing that is affordable, what do they turn to instead? Many will have no choice but to rent in subsidized housing! That is silly public policy! Why give billions to rental property owners, that often have older, less energy efficient houses, when much less money could go to supporting a greener, more energy efficient home that will create home owners and American jobs!

Thank you.

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