Please Do Not Reply This Email.

Public Comments on Enterprise Duty to Serve Underserved Markets:======

Title: Enterprise Duty to Serve Underserved Markets

FR Document Number: 2010-13411

Legacy Document ID:

RIN: null

Publish Date: Mon Jun 07 00:00:00 EDT 2010

Submitter Info:

Advocates for Basic Legal Equality, Inc. (ABLE) is a non-profit regional law firm that provides high quality legal assistance in civil matters to help eligible low-income individuals and groups in Western Ohio achieve self reliance, equal justice and economic opportunity. ABLE has a long history of advocating for and representing manufactured home park residents, homeowners, and homeowner associations both in and out of court. ABLE serve a thirty-two counties that includes both urban and rural areas.

ABLE believes that the most effective way to serve the underserved market of low-income manufactured homeowners is to provide financing to resident groups to purchase their manufactured housing community. The primary problem in manufactured homeownership is vulnerability caused by owning a home on rented land. This vulnerability forces manufactured homeowners to be subject to unfair community rule changes, unaffordable rent and fee increases, and abusive management practices. Resident purchase of manufactured housing communities can create stability and control for manufactured homeowners that will not be present in most investor-owned communities. We are not aware of any resident-owned communities in Ohio currently, but in our experience, residents of manufactured housing communities are very excited about the potential of a resident purchase of their community. FHFA assistance to resident groups to purchase manufactured housing communities can make this dream a reality in Ohio.