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Original: 2507

January 19, 2006

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Commonwealth Keystone Building, 4th Floor
400 North Street
Harrisburg, PA 17120

Mark Conte, Chief
Housing Standards Division
Office of Community Development
Department of Community and Economic Development
Commonwealth Keystone Building, 4th Floor
400 North Street
Harrisburg, PA 17120

RE: Manufactured Housing Improvement Program
PA Bulletin, Docket Number 05-2370

Dear Madam/Sir:

On behalf of the Pennsylvania Manufactured Housing Association (PMHA) representing the manufactured housing industry in the Commonwealth, I would like to thank the Department for assisting the industry to meet the mandates set by Congress in 2000 with the passage of the Manufactured Housing Improvement Act (MHIA of 2000). The MHIA of 2000 established a five year window for states to establish construction standards for the installation of manufactured homes as well as licensing and training for installers of manufactured homes.

For well over 20 years the industry has been in support of establishing standards to install our homes as well as provide for certification and training of installers. It is our position that the passage of the proposed rule will meet the requirements set by the MHIA of 2000. And although we support the proposed rule we would like to offer the following comments:

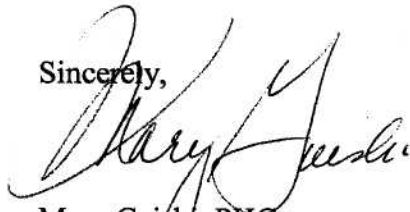
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INDEPENDENT REGULATORY
REVIEW COMMISSION

1. In reviewing the penalties section of the Manufactured Housing Improvement Program we have concerns that it does not provide enough flexibility and authority for the Department and the industry. In Section 149.8(1) the Department may suspend or revoke certifications. Although we feel this is important to assure compliance, we would like to see this section changed to allow the Department to first issue warnings prior to suspending or revoking certifications. Allowing them to issue warnings will give the Department ample opportunity to review circumstances while at the same time offering more balance and fairness to the program and the industry it impacts.

2. Along that same line we feel that the monetary penalties need to be set at levels that will deter violators and give the Department the authority to assure compliance while at the same time protecting the industry. We would like to see Section 149.8 (2) (b) changed to "up to \$1000 per separate violation."

Again, we applaud the Department for complying with the MHIA of 2000 while at the same time keeping government oversight minimal thus preserving the affordability of manufactured housing.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Gaiski". The signature is written in a cursive, flowing style.

Mary Gaiski, PHC
Executive Vice President

Cc: Independent Regulatory Review Commission