



Pennsylvania Manufactured Housing Association
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November 17, 2023

Lori K. Irwin, Chief Counsel
 PA Department of Community & Economic Development
 Governor's Office of General Counsel
 Commonwealth Keystone Building
 400 North Street, 4th Floor
 Harrisburg, PA 17120-0225

RE: DCED Proposed rulemaking – Inspections and Fees – Regulation No. 4-100

Dear Ms. Irwin:

The Pennsylvania Manufactured Housing Association is pleased to provide the Department of Community & Economic Development with feedback in response to the Department's Notice of Proposed Rulemaking (4-100) that would change the inspection cycle for industrialized housing factories and the cost of the insignia fees for each module constructed.

The Pennsylvania Manufactured Housing Association (PMHA) is a non-profit trade association formed in 1949 representing the factory-built housing industry to include those manufacturers, builders, installers, suppliers and developers who use the industrialized housing product. Pennsylvania is considered a production state and is home to 28 factories that build industrialized homes and distribute them to builders throughout the Northeast and Mid-Atlantic states.

PMHA supports the proposed increase of insignia fees for in-state manufacturers from \$40 to \$60 understanding this increase is needed to support the Department's current costs for the administration and enforcement of the Industrialized Housing Act. An adequately funded program is crucial for the success of the industrialized housing program in the Commonwealth.

Additionally, we support reducing the inspection cycle from annual to biennial for factories both within and outside the state. We agree with the Department that reducing the inspection cycles will not impact the oversight or effectiveness of the program due to additional oversight from third party agencies that conducts regular inspections of the manufacturers and provide reports back to the Department.

PMHA appreciates the opportunity to present these comments on this proposed rulemaking and would support its approval.

Respectfully submitted,

Mary Gaiski
 Executive Vice President