

Manufactured Housing Consensus Committee

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REC'D APR 12 2004

April 7, 2004

US Department of Housing and Urban Development
Robert C. Weaver Building – 451 Seventh Street, S.W.
Washington, DC 20410

ATTENTION: Secretary Alfonso Jackson

Dear Secretary Jackson:

During the scheduled conference call of the Manufactured Housing Consensus Committee (MHCC) on 5 April 2004, a discussion was held on the Notice of Proposed Rulemaking concerning Minimum Payments to States (69 FR9739). The MHCC, following the discussion, voted unanimously in accordance with the Committee's Bylaws, to submit this letter HUD expressing the following three concerns of the MHCC. Specifically, the MHCC believes:

1. That HUD did not follow the requirements of Sections 604(b)(3) and 604(b)(6) of the Manufactured Housing Improvement Act (MHIA) of 2000 to provide the MHCC a 120-day period for review and comment on procedural and enforcement regulations prior to publication of such regulations.
2. That failure to provide the rule to the MHCC is in violation of the MHIA of 2000, thus making the rule null and void.
3. That HUD should withdraw the rule on Minimum Payments to States and submit it to the MHCC for the requisite 120-day review and comment as stipulated by the MHIA of 2000. This proposed rule concerning State payments needs deliberate analysis, evaluation and development of recommendations through consensus of the interested parties which the MHCC can provide.

The MHCC asks that a response on each of these points be made and returned for our review and subsequent action.

Sincerely,



Dana Roberts, Chair
Manufactured Housing Consensus Committee

RES:DR:jtm

C: DFO, Administrator of the Federal Manufactured Housing Program
MHCC Members