

Were Abe Lincoln and Frank Rolfe Correct?

What's changed since [a *Pimple on an Elephant's Ass* was proclaimed at the 3.25.2021 FHFA Listening Session?](#)

Niskanen Center housing policy analyst attorney Andrew Justus' op-ed for [The Hill](#) pointed to zoning barriers and unequal financing options as factors "[holding back manufactured homes.](#)"

[Harvard's Joint Center for Housing Studies State of the Nation's Housing 2023](#) made similar observations.

Without mentioning the Manufactured Housing Institute (MHI), zoning expert and apparently pro-manufactured home law professor Daniel R. Mandelker said in a working paper for the Lincoln Institute that an '[Organization is Needed in Manufactured Housing for Litigation and Legislative Support.](#)'

Ouch.

Mandelker echoed the [Manufactured Housing Association for Regulatory Reform \(MHARR\) decade-plus call for a new post-production manufactured housing trade group.](#)

During an earnings call with [Cavco Industries CEO and MHI Vice Chairman William "Bill" Boor](#), analyst Gregory Palm bluntly asked: '[Why is Manufactured Housing Production so Weak?](#)'

Manufactured housing is in the [8th month of consecutive year-over-year declines](#) in HUD Code manufactured home production and shipments.

[MHARR's warnings on the problematic trend of declining manufactured home production](#) challenge [Biden-era assurances](#) pre-bunked by [HUD researchers.](#)

MHARR said for [decades](#) that near the heart of issues restraining more affordable manufactured housing are [zoning barriers](#) that [could be relieved](#) by an [application](#) of the [Manufactured Housing Improvement Act](#) (MHIA) of 2000 and its "[enhanced preemption](#)" provision.

Despite [LendingTree's research](#) the [uneven playing field in manufactured home lending](#) persists.

The [Duty to Serve \(DTS\) remains unenforced](#) on manufactured home chattel lending for [approaching 15 years.](#)

On paper, [MHI leaders Kevin Clayton and Lesli Gooch seemingly agreed.](#)

[In Congressional testimony under oath, Kevin spoke for MHI saying a lack of liquidity](#) hurt manufactured housing.

[Warren Buffett said DTS](#) would benefit manufactured housing.

But in practice, [why didn't MHI sue to get DTS and the MHIA's "enhanced preemption" enforced over a decade ago,](#) as [MHI belatedly sued to temporarily halt the harmful DOE energy rule?](#)

Unlike MHARR, MHI leaders arguably [palter](#) and [posture](#). MHI suggests manufactured housing production dropped due to [retailer inventory overstocking in 2022](#) and [rising interest rates.](#)

Pardon me, but in my expert view as [a long-time and successful former retailer in manufactured housing,](#) that's demonstrably *nonsense*.

[Chattel interest rates in the 1980s hit 20.5 percent,](#) over double current rates.

[Yet manufactured home production then was roughly three times](#) the annualized rate of production in [manufactured housing per year-to-date data for 2023.](#)

MHI knows that during the [same timeframe manufactured housing's production was falling, more costly conventional housing was increasing their production in 2023](#).

A well-placed MHI member told [MHPProNews](#) that Tim Williams, [CEO of 21st Mortgage Corporation](#) said he was "happy" that the [previously announced chattel pilots failed](#).

When a coalition of [nonprofits asked FHFA Director Sandra Thompson to compel Fannie Mae and Freddie Mac to enforce DTS chattel lending](#), [MHI was oddly missing](#).

Neither MHI, 21st, nor their attorneys denied these observations when [recently](#) and repeatedly asked by [MHPProNews](#).

[Triad Financial Services](#) is an MHI member with a multi-decade example that chattel lending can be done sustainably at more competitive rates than 21st or Vanderbilt Mortgage and Finance generally offer.

Several smaller lenders proved their ability to do what the law mandates that [FHFA should have Fannie and Freddie do](#).

Is it any wonder that Doug Ryan with [Prosperity Now accused MHI of working on Clayton and their affiliated lending's behalf](#) to tacitly allow [Berkshire Hathaway owned brands to dominate manufactured home lending](#)?

FHFA has a [mandate](#).

[Mandate](#) means a compulsory duty.

Obviously not everyone involved at [MHI, Fannie, Freddie](#) or [FHFA](#) are inept or corrupt.

That said, [Crossmods are but one example of how obviously](#) regulated entities have apparently colluded to [keep DTS for all HUD Code manufactured homes from becoming a reality](#).

Lincoln Institute's George McCarthy claimed DTS for communities made manufactured housing [less affordable](#).

Paul [Bradley for ROCUSA echoed McCarthy's](#) concern.

[MHI member Andy Gedo](#) said: **"Clayton's finance capability is a barrier to entry (what you like to call a "moat") that limits competition."**

The [Biden Administration and MHI claim they want more minority homeownership](#).

Then why is affordable [homebuying falling](#)?

Frank Rolfe and Amy Bliss cried "[hypocrisy](#)."

Wasn't [Abe Lincoln right](#)?

[Samuel Strommen's](#) research asserted [MHI and key members violated antitrust laws to limit and consolidate manufactured housing](#).

I'm [L.A. "Tony" Kovach](#). My thanks to the FHFA for reading and posting my hot-linked facts and observations. These hot-linked documented views will be posted on [ManufacturedHomeProNews.com](#) (MHPProNews.com) and [are on ManufacturedHomeLivingNews.com](#). ##