

**FILED<sup>2</sup>**  
JUN 26 2003

June 25, 2003

Mr. Dale Hardy Roberts, Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Delivery via Fax &amp; Mail

Missouri Public  
Service Commission

Re: Proposed Rules: 4 CSR 240-120.085 Inspection Fee  
4 CSR 240-121.065 Inspection Fee  
4 CSR 240-123.095 Inspection Fee

Dear Mr. Roberts:

The above proposed PSC rules have recently been presented to us by the Missouri Manufactured Housing Association for review. It is felt that this type of assessment to manufacturers and registered dealers in the State of Missouri would be very detrimental to the industry as a whole. It is also another fee that directly or indirectly would be passed on to the consumer thus increasing the cost of affordable living in the State of Missouri.

As is realized by everyone within our industry and the Missouri Public Service Commission, the last three years within this industry have been very difficult to say the least and we are now in the midst of at the worst financial crisis that has occurred in over 30 years. As this occurred and is occurring, we as an industry are doing what is necessary regarding our budgetary responsibilities in order to sustain these economic times without deterioration to the excellent customer service that is rendered by the majority of the manufacturers and dealerships within the State of Missouri. Our consumers are still the most important segment of our industry.

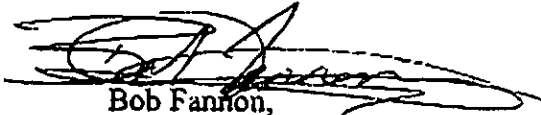
Over the last three years, the PSC has felt the need to increase revenues from the manufactured housing program and have already done so. These have been very significant and it is felt that a dramatic increase as suggested in the above proposed rules is unwarranted.

It is felt as though these proposed rules were not thought out thoroughly or with any foresight in that it even includes pre-owned homes that in most cases are sold "as is where is" and the PSC is suggesting that the manufacturers and dealers be held responsible for homes sold under these terms. This makes no sense whatsoever.

It is suggested that instead of the PSC arbitrarily recommending user fees or increases in taxes which, these inspection fees basically relate to, that they take the time and effort to form a committee consisting of members of the PSC, members of the manufacturing

segment of our industry, members representing the dealerships in the State of Missouri, and members representing manufactured home communities within the State of Missouri. This committee would be able to meet and logically come up with solutions that could very possibly enhance the manufactured home industry and be a credit to the PSC at the same time. It is requested that you research this avenue for amicable solutions. It is further requested that the PSC withdraw the referenced proposed rules due to the inequity that this will cause the entire manufactured home industry in the State of Missouri.

Sincerely,



Bob Fannon,  
Vice President of Operation, Sun Communities

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CC: Commissioner Kelvin L. Simmons, Chair  
Commissioner Connie Murray  
Commissioner Steve Gaw  
Commissioner Bryan Forbis  
Commissioner Robert Clayton  
Missouri Mfg. Housing Association