



Iseman
Since 1920 **Homes**

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June 17, 2003

Missouri Manufactured Housing Assoc.
P.O. Box 360
Jefferson City MO 65102

RECEIVED
JUN 20 2003

Attn: Mr. Dale Hardy Roberts
Re: Proposed Missouri Public Service Commission Inspection Fees

MANUFACTURED HOUSING
DEPARTMENT

Dear Mr. Roberts:

We were perplexed and dismayed to learn of a possible "rules" change relative to a \$400 inspection fee to be paid by dealers and/or manufacturers to the Missouri Public Service Commission any time they conduct an inspection at a customer's request. I don't believe I'm aware of any other industries that must bear the onus of such arbitrary inspection fees. Is the MPSC aware that if implemented, this will increase the cost of all manufactured housing in Missouri?

Currently, when necessary, we can obtain the inspection services of a HUD (Federal) inspector on an hourly plus expenses basis. Since a major portion of manufactured housing is governed by the HUD code, what is being offered to the customer that HUD cannot supply? Likewise, what are the qualifications of a MPSC inspector in relation to Federal code?

The proposed fees are unilateral in nature. The way we are reading the proposal, there is no "up-front" cost to the consumer...only the manufacturer and/or dealer. Why wouldn't every Missouri customer, once made aware of this free service, request the no-cost inspection? Since the validity of any complaint would be solely in the hands of MPSC, (who receives the \$400 fee), what measure is in place to assure any fairness in the process? None that we can see. Dealer and manufacturer are at the mercy of the "recommendation of the director" (see item 8) when it comes to payment of the fee.

Item (1) of the proposed rule states..."an inspection fee for all **complaints** or requests for inspections received from homeowners." This can be construed to mean that even a complaint, regardless if followed by a physical inspection will trigger a fee. Perhaps this was inadvertently poor wording.

The proposal does not provide for the presence of the builder or dealer. This would amount to governmental "taxation without representation" which is constitutionally barred in the United States of America. Therefore we certainly hope the association can take proactive measures to ensure that the people of Missouri do not need to bear the burden imposed by these unnecessary and possibly illegal fees.

Sincerely,

Randall Pohl
Iseman Homes
Operations Supervisor

FILED³

JUN 20 2003

RCP:mg
Cc: R. James Scoular

Missouri Public
Service Commission