

In the Matter of the Consideration of Proposed Amendments to Public Service Commission's Rules Related to Manufactured Housing under File No. MW-2016-0163

We have chosen to respond to the request for comments on these proposed undue and burdensome amendments.

With respects to:

4 CSR 240-120.085 Re-inspection (1)

"The manager may conduct [as needed] re-inspections of new manufactured homes to verify corrections have been made as identified during the original inspection or where required corrections have not been completed within sixty (60) days of receipt of a written complaint from the consumer."

The trigger for an initial site inspection is the REQUIRED property locator form. The Missouri Public Service Commission already requires a notification be sent to them within 48 hours of a brand new home arriving on site.

The original inspection is never scheduled nor is any time frame for inspection given. The inspector shows up based on his schedule when time and travel allows. This primary inspection routinely takes place prior to the home set-up process being completed, which practically guarantees there will be discrepancies noted on the findings report of the initial inspection because the home(s) is not yet complete. This will, therefore, trigger a "re-inspection" on every home that is not 100% complete at the time the inspector visits. The current inspection method will create additional expenses for the homeowner nearly 100% of the time. With a proposed \$200 per re-inspection fee, this can add up quickly to thousands of dollars for MH communities bringing in multiple homes at the same time.

We feel this is an undue burden and unfair process as written. With complete autonomy given to the inspector to inspect and re-inspect at any time, it is a guarantee that discrepancies will be found, and therefore, trigger this re-inspection fee. We ask that the MO Public Service Commission remove the proposed change until a more efficient inspection method can be developed and implemented.

Regards,

Chelsey Bannister
3/11/16