



438 Hwy MM, Lebanon, MO 65536

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Data Center  
Missouri Public  
Service Commission

Jamie Smith

Clayton Homes of Lebanon

438 Hwy MM

Lebanon, MO 65536

September 1, 2017

Office of Governor Greitens

P.O. Box 720

Jefferson City, MO 65102

Phone: (573) 751-3222

Re: Public Service Commission

Rule : 4 CSR 240-120.011

Dear Governor Greitens:

I am writing you in strong opposition of this rule and how it will affect many small business owners, as well as consumers in the manufactured housing industry.

I currently reside on the board of the Missouri Manufactured Housing Association as Vice President, and have served recently as President. I am also the Managing Partner/General Manager of Clayton Homes of Lebanon, who is currently the largest volume dealer of new manufactured homes in the state of Missouri.

This rule has been strongly opposed to the Missouri Public Service Commission in both private meetings and hearings, and public comments in the past by myself, several other MMHA Board of Director members, and general association members. We recently saw an official letter stating that the industry supported this rule, and would have no economic impact on small businesses. Both statements could not be further from the truth.


The ruling allows for multiple fines that will affect many businesses, such as manufactured home dealers, manufactured home installers, as well as manufactured home manufacturers and home building facilities. Many of these businesses are either small, family owned sole proprietors, or small partnerships. The amount of fees that are potentially going to be assessed, for doing nothing more than the Public Service Commission is already and currently doing in regards to the home inspections and consumer complaint process. It may have crippling effects on the small businesses in question, as well as an adverse effect on customers and home owners, due to the increased cost of doing business within the industry. The effect that excessive regulations have on the consumer is something that government overreach proponents fails to take into effect many times, and this I fear is one of those times.

The most troublesome aspect of this rule is it essentially allows for the PSC to have an open invoice system with no policing as to how excessive or legitimate the fines may be in regards to inspections, re-inspections, and the fines associated with them.

This rule will without any doubt have serious negative impact and financial burdens on all associated with an industry that has faced serious financial turmoil in the past, that is now experiencing an upswing, and that may provide a new affordable housing option for many consumers in an underserved housing market. Excessive government regulations and costs such as this rule can hinder affordability of any product, and ours is no different.

I proudly voted for you in your first term as governor, and appreciate all the work you are doing thus far in your tenure. I do ask for your support in doing anything possible to halt this potential ruling, and our association will continue to fight it on our end by any means necessary as well.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jannic Smith', is written over a circular stamp or seal.

Jannic Smith

Managing Partner/General Manager

Clayton Homes of Lebanon

Vice President

Board of Directors

Missouri Manufactured Housing Association