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June 27, 2001

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

FILED

JUN 28 2001

Missouri Public
Service Commission

MX-2000-430

Cases with check
marks are consolidated

Re: The following Proposed Rule and Amendments to Rules Concerning Pre-Owned Manufactured Homes: 4CSR240-121.010, 4CSR240-121.020, 4CSR240-121.040, 4CSR240-121.050, 4CSR240-121.060 and 4CSR240-121.090

Dear Mr. Roberts:

The Missouri Manufactured Housing Association has the following comments concerning the above-referenced proposed rules and amendments to rules. As the Commission is aware the Missouri General Assembly in its last session passed Senate Bill No. 317. Senate Bill No. 317 removed all reference to used homes except for "used modular unit(s) used for educational purposes."

The proposed rules and amendments were published prior to the passage of Senate Bill No. 317 when the Missouri Public Service Commission did, by statute, have regulatory authority over used homes. However, if the governor signs the legislation, from and after its effective date the Public Service Commission will no longer have authority to regulate used manufactured homes. At that time there will be no legislative authority to support the proposed rules. The Association assumes the PSC and its staff have come to the same conclusion and the proposed rules will be withdrawn.

For the reasons stated above the Missouri Manufactured Housing Association asks the Commission to withdrawal the above-referenced rules which seek to regulate pre-owned or used manufactured homes.

Very truly yours,

Jim Gallaher
James W. Gallaher

✓ MX-2000-433 = 4CSR240-121.010
MX-2000-432 = 4CSR240-121.020
✓ MX-2000-445 = 4CSR240-121.040
✓ MX-2000-430 = 4CSR240-121.050
✓ MX-2000-431 = 4CSR240-121.060
MX-2000-448 = 4CSR240-121.090