

Office of Government Ethics  
Suite 500 1201 New York Avenue, NW.  
Washington, DC 20005-3917

Attention: Richard M. Thomas  
Associate General Counsel

I am writing to you as the Executive Director of the Western Manufactured Housing Communities Association (WMA). We are a 501(c)(6) corporation. We are incorporated in California as a Mutual Benefit Corporation and our members are the owners of mobilehome parks in California. One of the main functions of WMA is to educate the members of our association. We have a very well respected management accreditation program. WMA's **Manufactured-Housing Community Manager (MCM)** program began in 1993 and has continued to grow in popularity and numbers throughout the years. Our MCM faculty is drawn from our Members and represents experienced industry attorneys, community owners and management leaders and our regulators. The Western Manufactured Housing Education Group (WMEG) in conjunction with Western Manufactured Housing Communities Association (WMA) awards this designation to community management professionals who have distinguished themselves in areas of experience, education, and ethical conduct. We have classes throughout the state 4 times per year.

Our Convention is a two and a half day meeting where education is the primary focus. We have four simultaneous breakout seminars for a total of 28 seminars during a two day period. During this time we had our regulators from the California Department of Housing and Community Development in attendance discussing registrations, regulations and responsibility. The interaction between our regulators and our members was very well received and were of benefit to both the parkowners and managers and the regulators. HUD is also a regulator of mobilehomes and manufactured housing. Your proposed rule would deny our members the benefit of our regulators knowledge and oversight of the industry. Trade associations provide a valuable forum for government regulators to educate large segments of industry and to inform the business as to what is required of them regulatory. We urge the Office of Government Ethics to reconsider the proposed amendments to Part 2635. The proposed rule doesn't hurt trade associations as much as it hurts the individual businesses that they represent and the government employees who are seeking education and dialogue with the industries they regulate.

Sincerely,

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