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My name is Kevin McShane and I am the Plant Sales Manager for Fleetwood Homes of Woodburn, Oregon. Our company started building Manufactured Homes to the Federal HUD Code in 1978. In 2007 we began building Recreational Park Model Trailers to the ANSI 119.5 code ("Park Models"). I am here to support passage of SB 753, a bill that will prevent recent regulatory changes by the Oregon Building Codes Division (BCD) from exporting jobs and taxes to neighboring states.

Over the last 10 years, our company has gradually grown Park Models into a significant part of our business. Today, we are the leading producer of Park Models in Oregon. On an annual basis this segment contributes about \$5 million dollars in revenue to our company and \$750K in direct labor payroll to Woodburn and surrounding communities.

When we entered the Park Model business, the regulatory environment for these products was a perfect fit for us. Park Model production fell entirely under the jurisdiction of BCD, the same as the HUD Code Manufactured Homes we already produced. We went through the required BCD process to obtain the license specifically allowing us to manufacture Park Models. This included having our building plans approved by BCD, and our facility and production processes inspected. Significantly, BCD also required us to incorporate the Quality Control Manual mandated by HUD as part of building Manufactured Homes, into our Park Model production process. This manual describes in detail our procedures for Quality Assurance and Quality Control. One of BCD's prime responsibilities as the State Administrative Agency for HUD Code homes is monitoring our compliance to these procedures. These processes have been described by BCD as "robust", which is why I would assume they were incorporated into the original licensing requirements for Park Models. In effect, these processes and controls serve the same function as trade licensing when building a highly engineered and regulated product like Park Models.

For 10 years we have built Park Models under this on this well-defined and stable regulatory process. Our company spent time, money and focus building up the Park Model business. BCD's decision to exit any involvement in the Park Model business, and most importantly to reinterpret existing statute to require separate and redundant licensing for factory plumbing and electrical installations in Park Models, upsets this regulatory environment immensely. Oregon would be the only state in the country with such a requirement for Park Models. Without SB 753, our plant will likely discontinue the Park Model business in Oregon. Our company would continue to serve the market from our facilities in Idaho and Arizona.

It's important to note that the licensure requirement will not stop Park Models from being placed in Oregon- only from being produced in Oregon. Since the ANSI 119.5 Code is recognized by most local Authorities Having Jurisdiction for placement into RV parks, these units will likely simply be imported from other states without the same licensing requirements. It is not an over simplification to say that the point of SB 753 is to keep currently employed Oregonians building these products instead of shipping those jobs to other states and then shipping the products back to Oregon.

Additionally, I would like to emphasize that SB 753 has nothing to do with so called “Tiny Homes”. It deals very narrowly with ANSI 119.5 Park Model Trailers. By stated definition in that code, these units are designed for “seasonal or temporary” living. It would seem that the changes in interpretation of statute that SB 753 addresses are in response to the proliferation of “Tiny Homes”, and the confusion about which code- if any- those are built to and what their appropriate uses are. SB 753 would not affect any of the other proposals currently being considered about codes or placement for any building other than Recreational Park Model Trailers.

Lastly, I would point out that there is no pattern of problems with Park Model homes as currently built and regulated. These products are being widely used and enjoyed as intended throughout the state. There are additional large vacation developments in various stages that are planned as Park Model resorts. SB 753 simply prevents a regulatory interpretation from exporting Oregon jobs to deal with a non-existent problem.

Thank You.