



Department of Business & Industry  
**MANUFACTURED HOUSING DIVISION**

**INFORMATIONAL STATEMENT**

February 9, 2017

**NRS 233B.066** Informational statement required concerning adopted permanent or temporary regulation; contents of statement.

**1. Except as otherwise provided in subsection 2, each adopted regulation which is submitted to the Legislative Counsel pursuant to NRS 233B.067 or filed with the Secretary of State pursuant to subsection 2 or 3 of NRS 233B.070 must be accompanied by a statement concerning the regulation which contains the following information:**

**(a) A clear and concise explanation of the need for the adopted regulation.**

*As the result of the passage of AB 270, a regulation is required to define the process of transferring a certificate of ownership for a manufactured home that was obtained through a voluntary surrender. The proposed regulation allows for a mobile home park owner to apply for a Limited Lien Resale License directly, instead of hiring a licensed MHD Dealer to process the transfer documents.*

*The proposed regulation also addresses the need to maintain the consistency of the term, "limited lien resale license" throughout all of Chapter 489 when applicable.*

**(b) A description of how public comment was solicited, a summary of the public response and an explanation of how other interested persons may obtain a copy of the summary.**

*The Division has collaborated closely with the Manufactured Home Community Owners, the trade association representing mobile home park owners. The Division held a workshop on December 7, 2015 where the proposed regulation was accepted favorably by industry.*

**(c) The number of persons who:**

- (1) Attended each hearing: 8**
- (2) Testified at each hearing: 0**
- (3) Submitted to the agency written statements: 0**

**(d) For each person identified in subparagraphs (2) and (3) of paragraph (c), the following information if provided to the agency conducting the hearing:**

*Not applicable.*

**(e) A description of how comment was solicited from affected businesses, a summary of their response and an explanation of how other interested persons may obtain a copy of the summary.**

*The Division has collaborated closely with the Manufactured Home Community Owners, the trade association representing mobile home park owners. The Division held a workshop on December 7, 2015 where the proposed regulation was accepted favorably by industry.*

**(f) If the regulation was adopted without changing any part of the proposed regulation, a summary of the reasons for adopting the regulation without change.**

*No changes were necessary for the adopted regulation, since there was no adverse testimony.*

**(g) The estimated economic effect of the regulation on the business which it is to regulate and on the public. These must be stated separately, and in each case must include:**

**(1) Both adverse and beneficial effects; and**

- **Adverse effects** – *The Division does not anticipate an adverse effect on small businesses, since this regulation proposes a much lower expense to the mobile home park owner to purchase a \$50*

*Limited Lien Resale License fee versus hiring a licensed Dealer for a Certificate of Ownership transfer.*

- **Beneficial effects** –*The adoption of R115-16 will allow a mobile home park owner to apply for a Limited Lien Resale License directly, instead of hiring a license Dealer. The cost of this process is significantly lower than the fee a licensed Dealer would charge for processing a Certificate of ownership transfer. It will also allow for a shorter timeframe for the consumer to receive their title.*

**(2) Both immediate and long-term effects.**

- **Immediate Effect** - *The immediate economic effect will be positive for industry since a mobile home park owner will now have the ability purchase a Limited Lien Resale License.*
- **Long-term Effect** - *The long-term economic effect will be positive for the mobile home park owner since the cost of future title transfers will be significantly less than the fees charged by the licensed Dealer to process the transfer paperwork.*

**(h) The estimated cost to the agency for enforcement of the proposed regulation.**

*No additional cost will be incurred by the Division to enforce this regulation. All Division fees are calculated to reimburse the Division staff for the time and material expended to perform the requirements of the regulation.*

**(i) A description of any regulations of other state or government agencies which the proposed regulation overlaps or duplicates and a statement explaining why the duplication or overlapping is necessary. If the regulation overlaps or duplicates a federal regulation, the name of the regulating federal agency.**

*This proposed regulation does not overlap with any other state or federal regulations.*

**(j) If the regulation includes provisions which are more stringent than a federal regulation which regulates the same activity, a summary of such provisions.**

*This proposed regulation does not include any provisions that are more stringent than a federal regulation.*

**(k) If the regulation provides a new fee or increases an existing fee, the total annual amount the agency expects to collect and the manner in which the money will be used.**

*There is not a new fee in this regulation. The existing fee, pursuant to NAC 489.775(1)(a), will be charged once for each Certificate of Ownership.*

**2. The requirements of paragraphs (b) to (f), inclusive, of subsection 1 do not apply to emergency regulations.**

*This is not an emergency regulation.*