



Senior Bank Administration
MAC K3212-051
P.O. Box 196127
Anchorage, AK 99519

Wells Fargo Bank, N.A.

March 21, 2011

Senator French
State Capitol
Room 417
Juneau, AK 99801

RE: SB-104 Manufactured Housing Conversion Procedure Process

Dear Senator French:

Wells Fargo is writing to support SB-104, the Manufactured Housing Conversion Procedure Process bill.

SB-104 will amend state law in Alaska to provide a formal method of eliminating the certificate of title to a manufactured home, converting the home to real property when the home is or will be permanently affixed to real property, and obtaining a new certificate of title when a home previously affixed to real property is severed.

Alaska's current statutes do not meet the eligibility requirements to sell a mortgage loan for a manufactured home to Fannie Mae or Freddie Mac, including the process to legally classify the home as real property and placing the lender in first lien position.

Wells Fargo has had to turn away business to potential borrowers because Alaska does not have a clear method of converting a factory built home to real property, especially older manufactured homes that come back on the market for resale.

SB-104 would bring state definitions of manufactured homes into accordance with HUD definitions to create a system for title transfer and property conversion. Additionally, it would create a means for titling manufactured homes that have been affixed to property, but the title cannot be found.

We feel the bill will: (1) Help manufactured homeowners who have their manufactured home already affixed to real property be better able to gain access to credit and be able to more easily sell their homes; (2) Help manufactured homeowners in the state increase the value of their homes by allowing them to convert their manufactured homes to real property, including manufactured homes not covered by certificates of title or for which the certificates of title cannot be found; (3) Help lenders gain perfected security interests in manufactured homes; and (4) Help the Alaska Division of Motor Vehicles by putting

in place a formalized procedure for canceling a title when a manufactured home is put on a permanent foundation.

Thank you for the opportunity to provide comment on SB-104.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Strutz', with a stylized flourish at the end.

Richard Strutz
Regional President
Wells Fargo Bank, N.A.
Anchorage, AK

Alaska Bankers Association

P.O. Box 241489 • Anchorage, Alaska 99524-1489 • Ph. 907-261-3525 • Fax 907-562-1758

March 25, 2011

Senator French
State Capitol
Room 417
Juneau, AK 99801

RE: SB-104 Manufactured Housing Conversion Procedure Process

Dear Senator French:

The Alaska Bankers Association consists of the following eight member banks: Alaska Pacific Bank, Denali State Bank, First Bank Ketchikan, First National Bank Alaska, KeyBank, Mt. McKinley Bank, Northrim Bank, and Wells Fargo Bank.

The Alaska Bankers Association supports SB-104, the Manufactured Housing Conversion Procedure Process bill.

SB-104 will amend state law in Alaska to provide a formal method of eliminating the certificate of title to a manufactured home, converting the home to real property when the home is or will be permanently affixed to real property, and obtaining a new certificate of title when a home previously affixed to real property is severed.

Alaska, unlike the vast majority of states, has no formal statutory procedure for converting a manufactured home to real property. Under current Alaska law including Alaska's Uniform Commercial Code, a security interest in a manufactured home permanently affixed to land can be perfected only by noting the secured party's interest on the home's certificate of title and recording a deed of trust with a fixtures clause and an appropriate description of the home. The need for legislation arises from the fact that the Alaska Division of Motor Vehicles ("DMV") will not issue a title for a manufactured home that is affixed to a permanent foundation, notwithstanding the requirements of the Uniform Commercial Code, and has created and administers a vaguely defined procedure with no record notice. The result for many Alaska manufactured homeowners is an unmarketable title to their home and for many lenders an unperfected security interest in their collateral.

In addition, Alaska's current statute does not meet the eligibility requirements to sell a mortgage for a manufactured home to Fannie Mae or Freddie Mac, including the process to legally classify the home as real property and placing the lender in first lien position. Alaska also does not have a clear method to convert a factory built home to real property, especially older manufactured homes that come back on the market for resale.

Alaska Bankers Association

P.O. Box 241489 • Anchorage, Alaska 99524-1489 • Ph. 907-261-3525 • Fax 907-562-1758

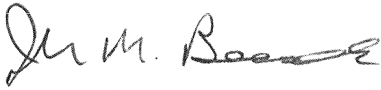
AK SB-104 will bring state definitions of manufactured housing into accordance with HUD definitions to create a system for title transfer and property conversion. Additionally, the bill will create a means for titling manufactured homes that have been affixed to property, but the title can't be found.

This bill is good for manufactured home owners and good for lenders that finance manufactured homes.

Thank you for the opportunity to provide comment on SB-104.

Sincerely,

ALASKA BANKERS ASSOCIATION

A handwritten signature in dark ink, appearing to read "Joe Beedle". The signature is fluid and cursive, with the first name "Joe" and last name "Beedle" clearly distinguishable.

Joe Beedle
President

ALASKA LAND TITLE ASSOCIATION

P.O. Box 241811 • Anchorage, Alaska 99524

April 6, 2011

Senator Hollis French
Alaska State Capitol Room 417
Juneau, AK 99801

Re: Senate Bill 104

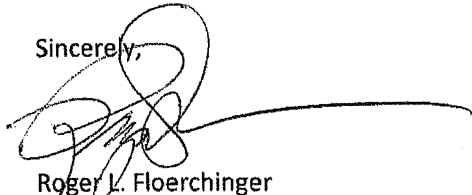
Dear Senator French,

As Past President of the Alaska Land Title Association and current Chairman of the Legislative and Regulatory Committee I have polled the members of my committee and with unanimous consent I offer that committees support of Senate Bill 104. ALTA's bylaws require 30 days notice before the board can hold a meeting and pass a resolution of support but I can assure you that that vote would be unanimous as well. That board represents 25 member companies throughout the state of Alaska.

We believe that Senate Bill 104 will protect the interest of Alaska's homeowners as well as the interest of the real estate finance industry and the land title industry.

If you or anyone in your office has any questions regarding my industry's take on this proposed legislation please do not hesitate to call me at my office.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Floerchinger', with a long horizontal line extending to the right.

Roger L. Floerchinger
Legislative and Regulatory Affairs Committee
Alaska Land Title Association
(907) 456-3474



First American Title

TERRY E. BRYAN
VICE PRESIDENT
ALASKA STATE MANAGER

Transmitted via Fax

907-465-6595

Attention: Andy Moderow

April 6, 2011

Senator Hollis French

State Capitol Room 417

Juneau, AK 99801

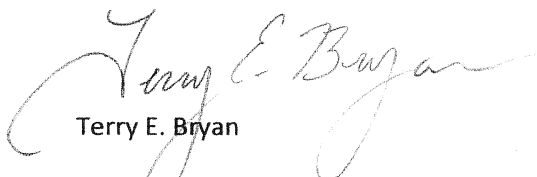
First American Title Insurance Company supports Alaska Senate Bill 104.

First American Title has been operating, in multiple locations within the great state of Alaska for more than 30 years and feels that we are an integral part of the economic community. Passage of SB 104 is truly in the best interest of the citizens of Alaska.

In addition, as a representative of the Alaska Land Title Association's Legislative Committee, I feel confident that they will acknowledge their support following a membership poll, later today. The Alaska Land Title Association is made up of more than 25 statewide member companies, within Alaska.

If anyone from your office or committee wishes to discuss this issue, please feel free to contact myself, at your earliest convenience.

Respectfully Submitted,


Terry E. Bryan
Vice President – Alaska State Manager

3035 C Street, Anchorage, AK 99503

TEL 907.561.1844 • FAX 907.561.1948

terbryan@firstam.com • www.firstam.com