

February 22, 1996

Patricia A. Aldridge
Executive Vice President
Greater Texas Federal Credit Union
6411 North Lamar Blvd.
Austin, Texas 78752-4088

Re: Recreational Vehicle Loans (Your February 6, 1996, Letter)

Dear Ms. Aldridge:

Your credit union contends that a \$170,000 recreational vehicle used as a member's primary residence should not be restricted to the 12 year loan maturity limitation found in Section 107(5) of the Federal Credit Union (FCU) Act, 12 U.S.C. §1757(5), and Section 701.21(c)(4) of NCUA's Rules and Regulations. Your federal examiner has taken exception to a 15 year loan that your FCU has made on this vehicle.

As we stated in our March 18, 1993, letter, a mobile home must meet the definition of a "manufactured home" as established in the National Manufactured Home Construction and Safety Standards Act, 42 U.S.C. §5402(6) (the "Standards"). Under the Standards, a manufacturer of a manufactured home must furnish a certification to the "distributor or dealer at the time of delivery of each such manufactured home . . . that [it] . . . conforms to all applicable Federal construction and safety standards. Such certification shall be in the form of a label or tag permanently affixed to each such manufactured home." 42 U.S.C. §5415. Please send us evidence that this recreational vehicle is properly certified as a manufactured home. An affidavit from the manufacturer and a photograph of the certification on the vehicle would be acceptable.

Sincerely,

Richard S. Schulman
Associate General Counsel

GC/RSS:bhs
SSIC 3000
96-0217
cc: Jon Lander, Region V