



March 21, 2017

Mr. Jim Gray
Director, Duty to Serve Program
Federal Housing Finance Agency
400 7th St. SW
Washington, DC 20024

Via email: DutytoServeStakeholders@fhfa.gov

Request for Input (RFI): Support for Chattel Financing of Manufactured Homes

Dear Mr. Gray:

The Rocky Mountain Home Association (RMHA) is pleased to submit comments in response to FHFA's January 2017 Request for Input (RFI) on Enterprise purchases of chattel manufactured home loans. The RMHA represents the manufactured and modular home industry in Colorado. Our members include out-of-state manufacturers, retailers, manufactured home communities/mobile home parks, lenders, installers, insurance providers, home product suppliers and more. The RMHA has over 200 members and they are located in various areas of Colorado and also in other states of the US. The Colorado market is very diverse and ranges from custom-home consumers to low-income residents who are barely meeting the requirements of purchasing a home of their own.

In my opinion, it is important to have and promote a secondary market for chattel lending in order to attract investors and money into the market. Currently, there are few chattel lending sources which limits the total portfolio amounts that can be lent on over a specific period of time (depending on the investor's requirements and/or restrictions).

As referenced earlier when describing some of the Colorado consumers, manufactured homes in our nation are a critical source of affordable housing for more than 22 million working families. Close to 60 percent of new manufactured homes sell for less than \$70,000. Sadly, compared to site-built homes, chattel loan borrowers do not share the same financing options. These limitations put consumers at a disadvantage in a number of areas including the ability to purchase new and existing homes and also reduce interest rates through refinancing.

Manufactured housing is one of three "underserved markets" identified in the 2008 HERA provision which creates a Duty to Serve (DTS) for Fannie Mae and Freddie Mac (the "Enterprises"). We believe that the Enterprises cannot meet this obligation without supporting chattel financing. Please support the industry's request for your support for chattel financing.

Sincerely,

Tawny Peyton
Executive Director