

Leaving all the above aside, here are my comments:

1. General Support: Fannie Mae and Freddie Mac are to be commended for refocusing on certain underserved markets.

2. General Criticism:

2.1 Approximately 27% of ownership housing is in one of the three types of community associations (condominium, cooperative and planned community) yet this fact is not recognized in the *Duty to Serve Plans* and in the issues raised in the *Request for Input*. It is understood that dealing with underserved markets characterized by traditional subdivision and similar types of housing — that this is a challenge. When that housing is in a community association, the challenge is even more difficult.

2.2 The GSEs, however, have to make the effort to recognize and deal with community associations and association housing units in the *Duty to Serve Plans*.

2.3 This need for recognition is not just based on the current use of community association. Currently, over 60% of all new home construction is in some type of community association. Because of the growth and acceptance of community associations, the structure and function of U.S. housing is changing and will continue to change in the same direction. Making a mortgage in a community association in an underserved market works best if there is understanding of the housing organization that is responsible for that housing.

2.3 Further, this type of comprehensive data for all three types of community associations needs to be placed in a database. Currently, virtually all data and documents connected in community association mortgage lending is collected over and over and over ...again and again.

3. Fannie Mae, p.36/88 et seq. Shared Equity

3.1 See the *Foundation for Community Association Research* publications for community association descriptions by type of association, variety of association uses and estimated community association data according to certain functions.

[The Sharing Equity Project: Bringing Community Associations and Affordable Housing Organizations Together \(2016\)](https://foundation.caionline.org/wp-content/uploads/2017/06/valencia_final_paper.pdf)

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[Community Association Fact Book 2018](https://foundation.caionline.org/publications/factbook/)

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3.2 Same comment as in #2 above.

4. Fannie Mae, p.41/88, et seq. Economic Diversity: How will this be addressed in a community association?

5. Fannie Mae, p.44/88, et seq. Mixed Income: How will this be addressed in a community association?

6. Freddie Mac, 77/88 et seq. Small Originators: How will this be addressed for reporting on housing in a community association?

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