



September 8, 2014

VIA ELECTRONIC DELIVERY

Federal Housing Finance Agency
Office of Policy Analysis and Research
400 7th Street, SW, Ninth Floor
Washington, DC 20024

Re: Fannie Mae and Freddie Mac Guarantee Fees: Request for Input

Dear Sirs and Madams:

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing approximately 300 state and nationally chartered banks, savings and loan associations, and savings banks located in communities throughout the state. WBA appreciates the opportunity to submit input to the Federal Housing Finance Agency (FHFA) regarding Fannie Mae and Freddie Mac (collectively, the government sponsored entities, or GSEs) guarantee fees.

WBA appreciates that FHFA recognizes guarantee fees charged to large and small lenders have reached approximate parity, and strongly recommends that FHFA maintain the current structure in which a lender's volume of loans sold to the GSEs does not impact the guarantee fees charged. WBA makes this recommendation in light of the current economic conditions of the U.S., and the fragile state of the housing market recovery.

WBA does not believe it is the appropriate time to make significant increases to the guarantee fees charged by the GSEs. WBA recommends that any future guarantee fee increases be carefully considered, only when economic and housing market conditions significantly improve, and then as part of a holistic approach with the goals of returning private capital to the secondary mortgage market, reducing the government's role in that market, and adequately compensating the federal government for the risk borne by its sponsorship of the GSEs.

Again, WBA appreciates the opportunity to submit input regarding the GSEs' guarantee fees.

Sincerely,

A handwritten signature in black ink, appearing to read "Rose Oswald Poels". The signature is written in a cursive style.

Rose Oswald Poels
President/CEO