

From: Joyce Dillard [dillardjoyce@yahoo.com]  
Sent: Friday, January 07, 2011 5:03 PM  
To: !FHFA REG-COMMENTS  
Subject: RIN 2590-AA36 Comments to FHFA-2010-0039-0001 due 1.7.2011

Solvency issues are unclear in this document. How are State Housing Finance Agencies handled if the State is close to default and/or insolvency?

How are loan defaults handled and with what reserve requirements and/or asset recapture.

The definitions or meanings are unclear for:

- Cooperative ownership structure
- Mission of providing liquidity to members
- Affordable housing and community development mission
- Capital structure
- Joint and several liability

Unclear are the unfunded mandates, the role of Executive Order 13132. Functions of State and Local Governments are not considered. Incorporation issues and (Land Use) Planning issues are not a function of the Federal government and we cannot see how the definitions can be incorporated without providing mandates.

Credit agencies have no measure for credibility, as seen by their behavior in the mortgage crisis, and we question how their usage is significant.

Due process issues are not addressed. This seems to be a debt mechanism without the taxpayer voice.

Unclear are mortgage default procedures and asset inventory responsibility. We do not understand what non-mortgage assets are unless they are physical inventory. What are the criteria to hold onto that inventory?

How are Joint Powers Authority JPA addressed as a lending institution. They tend to not fall into State laws governing open meetings and there is no system to identify the authorities.

How are assets distributed if the JPA ceases.

The use of derivatives is unclear and we do not see how they are incorporated into regulations from other agencies.

Department of Housing and Urban Development Section 108 loans have become a conduit for individuals and entities who ignore the requirements of the execution of the loan and use this government money as easy credit and cash. Compliance issues are not addressed.

Part of any improvement is results. This addresses the issuance, but not the intention of the funding in the first place.

As a citizen familiar with loans in areas qualified, those live in this areas are burdened by the use of our geography for easy money and not the intended purpose.

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