

September 14, 2009

Mr. Alfred M. Pollard, Esq. General Counsel Attn: Comments/RIN2590-AA27 Federal Housing Finance Agency Fourth Floor 1700 G Street N.W. Washington, D.C. 20552



Dear Mr. Pollard,

Re: Duty to Serve Underserved Markets for Government Sponsored Enterprises Advance Notice of Proposed Rulemaking – RIN 2390-AA27

We are a Texas-based manufactured housing company, employing 550 people in three production facilities and twenty-five retail outlets. We believe that others in the manufactured housing industry may have also contacted you as to the above-referenced subject but wanted to add our own comments as well. While manufactured (or HUD- code) housing is a leading source of affordable housing across the country, both GNMA and FNMA have reigned-in lending standards to the point that consumer financing for such housing is severely limited. Couple this with a pronounced retraction of financing from other (non-GSE) sources and the situation has become even more critical.

In short, the affordable (and especially HUD-code) housing market is grossly underserved today with no signs of meaningful improvement in the near-term. Other factors, unrelated to the availability of consumer financing, have placed additional pressure on the manufactured housing industry resulting in the lowest level of production and shipments in more than 60 years. Meaningful change and recovery for the industry begins with a broader and more reliable base of consumer financing. The GSE's must embrace manufactured housing products and make a concerted effort of support rather than shy away from this segment and restrict the average customer's ability to obtain financing.

Rather than a long and very detailed list of various factors and possible corrective actions, we ask, instead, for the FHFA to incorporate rules which encourage GNMA and FNMA to meet their "duties to serve" the presently underserved manufactured housing market, under the law.

Please do not hesitate to contact the undersigned with questions or comments.

Thank you,

Sincerely,

Eints F. Teeter Chairman and CEO