



September 18, 2009

Alfred M. Pollard
General Counsel
Federal Housing Finance Agency,
Fourth Floor
1700 G Street, NW
Washington, DC 20552.

Attention: Comments/RIN2590-AA27

Dear Alfred:

Thank you for giving us the opportunity to provide feedback with respect to your request for comment concerning underserved multifamily markets. This letter will respond specifically to 12 CFR Part 1282, III. Duty to Serve Provisions, B. Underserved Markets, Manufactured Home Parks:

Manufactured Home Parks. Many manufactured home residents site their homes in manufactured home parks and rent the underlying land. Some manufactured home parks are investor-owned and others are resident-owned. Fannie Mae and Freddie Mac currently purchase loans secured by manufactured home parks. FHFA seeks comment on whether and how these transactions should be considered under the duty to serve the manufactured housing market and on the types of flexibility the Enterprises could add to their underwriting guidelines to facilitate financing these transactions. FHFA also solicits comment on whether there should be differences in how resident-owned parks and investor-owned parks are treated for purposes of the duty to serve the manufactured housing market.

Clearly this is an extremely complex issue with many far reaching ramifications. We will comment with respect to current guidelines of each GSE:

Freddie Mac

- Currently does not purchase or originate loans with respect to this asset class. Centerline has encouraged Freddie Mac to develop a product offering; we are told it is on the "drawing board" for development in 2010.

Fannie Mae

- Current asset quality requirements support "four star" parks or better which are mostly retirement and luxury parks and do not support affordable housing where it is truly needed.
- Requires a twenty five year amortization on family-oriented parks versus a thirty year amortization on senior (55+) parks.
- Restricts parks with a high percentage of single-wide homes; which are the most affordable.

p: 212 317 5700
f: 212 751 3550

625 Madison Ave NY NY 10022
www.centerline.com

Our recommendation is as follows:

- Develop asset standards to finance three star parks as well as four star parks, as the current asset quality standards support a class that could be served by other parts of the financial sector and overlooks mandate.
- Amortization should be no less than thirty years especially given the fact that the true assets being mortgaged land and infrastructure do not depreciate at an accelerated pace like other asset classes. With Manufactured Home Parks, collateral for the loan is the pad rent paid by the owners of the homes, and the mortgage lien is placed on the land, pads, and site improvements like utilities and clubhouse.
- No limitation should be placed on the percentage of single-wide homes in parks. The emphasis in identifying qualified parks should be on the history of the park, stability of the tenant profile, market acceptance/standard and the housing needs of the area
- Allow financing of resident owned communities, which they do for other multifamily segments in which residents/tenants have a vested interest in community, such as New York City Cooperatives.

Sincerely,

Centerline Capital Group