



OHIO MANUFACTURED HOMES ASSOCIATION
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September 16, 2009

Alfred M. Pollard, Esq.
General Counsel
Attn: Comments/RIN 2590-AA27
Federal Housing Finance Agency
1700 G Street, N.W., Fourth Floor
Washington, D.C. 20552

Dear Mr. Pollard:

The Ohio Manufactured Housing Association (OMHA) is the sole industry organization that serves all of Ohio as a non-profit trade association. We represent all segments of the manufactured housing industry. Manufactured homes account for approximately 10% of all new housing starts in Ohio annually. For many low and moderate income citizens as well as senior citizens on fixed incomes, manufactured homeownership represents one of the very few opportunities for affordable homeownership without any government subsidies.

OMHA is contacting you today in response to the Advance Notice of Proposed Rulemaking (ANPR) concerning the "Duty to Serve Underserved Markets for Enterprises" published by the Federal Housing Finance Agency (FHFA) in the Federal Register on August 4, 2009.

The manufactured housing industry offers American consumers the most affordable form of homeownership available. Yet the housing opportunities offered by HUD Code homes are being denied to millions of low, lower, and moderate-income families due to the unavailability of private financing, driven by Enterprise requirements that have left manufactured home loans egregiously under-represented in the Enterprises' portfolios. This has simultaneously left the manufactured housing industry fighting for its survival. As Congress has recognized through the DTS provision, this failure of the Enterprises must be remedied, and must be remedied expeditiously, in order to restore the quality, affordable housing opportunities that Americans need to revitalize the ailing manufactured housing industry.

Accordingly, OMHA would like to respectfully urge FHFA to act expeditiously to develop proposed and final rules to implement DTS and ensure that such rules are in place no later than January 1, 2010.

Your consideration is greatly appreciated and will assist the manufactured home industry to continue to provide citizens of modest income the opportunity for homeownership.

Sincerely,

Tim Williams
Executive Director