

Comment #4

From: John Wiltse [jwiltse@ruralinc.org]  
Sent: Friday, December 12, 2008 11:09 AM  
To: Comments  
Subject: Comment on RIN 2590-AA04

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December 12, 2008

Federal Housing Finance A (FHFA)

Dear Federal Housing Finance A (FHFA):

I write to comment on the Federal Housing Finance Agency (FHFA) interim final rule to require the FHFA to allow the the Federal Home Loan Banks (Banks) to use Affordable Housing Program (AHP) homeownership set-aside funds to refinance mortgages.

The FHFA should demand a \$2 match from participating financial institutions for every \$1 received from the AHP for foreclosure mitigation.

The Federal Housing Finance Board's original proposal included this requirement. The Banks should first utilize other funds already available to them and demonstrate their impact before tapping into a reliable source of homeownership already seen as a critical part of the pipeline for affordable homeownership.

The original proposal was quite controversial and drew a number of opposing comments which are not reflected in this Interim Rule.

The FHFA has substantial flexibility to require some local buy-in before enabling a member financial institution to take resource from new, first-time low-income homeowners at a time where it is more difficult to get mortgages.

Sincerely,

John Wiltse