

April 27, 2006

The National Association of Housing Cooperatives offers the following comments.

1. We applaud adding the specificity that AHP subsidies can be part of loan pools.
2. We support flexibility in monitoring, including sampling.
3. We ask that the present value methodology be continued to be used for deeply discounted funding.
4. We request that attention be given to mechanisms other than deed restrictions for use on tribal lands.
5. We ask that manufactured housing be an eligible use, as that form of housing meets a large portion of the affordable housing supply, not only in rural areas, but also in suburban and exurban areas. There are over 500 cooperatively-owned manufactured home parks in Florida alone.

Thank you for the opportunity to comment

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October 18-21, 2006, NAHC Annual Conference "Co-ops--Spectacular By Nature" at the Hyatt Regency, Vancouver, British Columbia