



April 16, 2004

Federal Housing Finance Board
1777 F Street, N.W.
Washington, DC 20006

Re: Monthly Survey of Rates and Terms on Conventional, 1-Family, Nonfarm Loans
69 FR 7638 (February 18, 2004)

Dear Sir or Madam:

America's Community Bankers ("ACB")¹ is pleased to respond to the Federal Housing Finance Board's ("FHFB") request for comments concerning the three-year extension of the information collection and publication of the Monthly Survey of Rates and Terms on Conventional, 1-Family, Nonfarm Loans commonly known as the Monthly Interest Rate Survey or MIRS.²

The FHFB has requested comments on the necessity of the continued collection of information and publication of the MIRS, its practical utility, the accuracy of estimates of the collection burden on participants, ways to enhance its utility and clarity and ways in which to reduce the burden of the information collection on respondents.

ACB encourages the FHFB to extend MIRS for a three-year period, without changes in the survey or methodology. We believe that the collection and publication of current MIRS data is very important for the following reasons:

- ACB member financial institutions and others in the business of originating and investing in home mortgage loans rely upon the survey as the basis for strategic decisions, including pricing loan originations and sales.
- The secondary market housing government sponsored enterprises, Fannie Mae and Freddie Mac, use the MIRS results as the basis for the annual.
- Adjustments to the maximum dollar limits for their purchases of one- to four-family home mortgages.

¹ America's Community Bankers represents the nation's community banks. ACB members, whose aggregate assets total more than \$1 trillion, pursue progressive, entrepreneurial and service-oriented strategies in providing financial services to benefit their customers and communities.

² 69 Fed. Reg. 7638 (February 18, 2004)

Monthly Survey of Rates and Terms

April 16, 2004

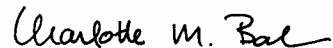
Page 2

- For primary mortgage participants, MIRS results form the basis for the distinction between “conforming” and “non-conforming” loans and markets.
- MIRS results are also used to calculate FHA loan limits.

ACB supports the changes made by the FHFB, as of January 2003, to the method in which mortgage lenders must report under MIRS. Also, with regard to ARM index rates, the FHFB substituted substantially similar ARM indexes for some non-standard indexes that may no longer be available. We believe these changes improved the reliability of the survey and encouraged participation by smaller entities and on a geographically diverse basis.

ACB encourages the FHFB to extend current MIRS reporting and publishing requirements for three years. ACB appreciates the opportunity to comment on this important matter. If you have any questions, please contact Janet Frank at 202-857-3129 or jfrank@acbankers.org.

Sincerely,



Charlotte M. Bahin
Senior Vice President
Regulatory Affairs