

March 12, 2014

Federal Housing Finance Agency (OPAR) Constitution Center 400 7th Street SW, 9th Floor Washington, DC 20024 <u>loanlimitinput@FHFA.gov</u>

RE: [No. 2013-N-18]

To Whom It May Concern:

The Greater Tampa Association of REALTORS®, Inc. would like to provide input on the above referenced notice entitled, "Fannie Mae and Freddie Mac Loan Purchase Limits: Request for Public Input on Implementation Issues." Existing Ioan limits have been critical in restoring stability to local housing markets across our state and we urge you to NOT change the existing Ioan limits.

While we have seen a nominal improvement in the housing market, purchasing a home remains a challenge for many potential homeowners because of the restrictive availability of credit; particularly, if available loans cannot be purchased or insured by the government sponsored entities (GSEs) or FHA. The contemplated reduction in loan limits affects many borrowers in areas who rely on the liquidity that the GSEs provide. These same borrowers will have difficulty qualifying under the tight credit standards currently required by private lenders, including the 20% down payment requirement that is a minimum for most lenders. Outside of the GSEs and FHA, credit remains limited and available only to wealthy borrowers with perfect credit. Unfortunately, these conditions leave the American dream of home ownership out of reach for many families.

In the Federal Register announcement on December 23rd, FHFA noted that reducing the loan purchase limits is consistent with its legal authorities as conservator provided under the Housing and Economic Recovery Act of 2008 (HERA). However, we would argue that by making a decision to lower the purchase limit, FHFA would be superseding congressional intent under that same law which:

- 1. Established the maximum loan limit for loans purchased by the GSEs; and
- 2. Made it a principal duty of the Director to ensure that the GSEs serve as a reliable source of liquidity and funding for housing finance and community investment.

Federal Housing Finance Agency March 12, 2014 Page Two

Maintaining a steady, nationwide floor for the GSE loan limits contributes to stabilizing housing prices, the stability of the housing finance system, and consumer confidence. Continued downward pressure on the limits adds to the uncertainty in mortgage markets

It's vital that the federal government act to maintain market stability, not add disruptive and unnecessary changes at this crucial time in the nation's economic recovery. While the housing market appears as a promising recovery, data reflects that it remains delicate. Based on market conditions and the terms of the Housing and Economic Recovery Act of 2008, we urge you to not take steps, such as reducing limits which will merely restrict consumer access to mortgage credit.

Sincerely,

GREATER TAMPA

ASSOCIATION OF REALTORS®, INC.

Tina C. Harris 2014 President

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