September 8, 2014

The Federal Housing Finance Agency Constitution Center 400 7th Street, SW Washington DC, 20014 Attn: Mortgage Insurance Eligibility Project

Re: 2014-N-9: Draft Private Mortgage Insurance Eligibility Requirements

Dear Director Watt:

The Federal Housing Finance Agency released a request for input from the public on the draft Private Mortgage Insurer Eligibility Requirements on July 10, 2014. The PMIERs were developed by Fannie Mae and Freddie Mac under the oversight of the Federal Housing Finance Agency as their conservator. I am pleased to have this opportunity to provide this response pursuant to your request on behalf of the authors.

Sincerely yours,

N/L]-L

Mark Zandi Chief Economist Moody's Analytics

Jim Parrott Senior Fellow Urban Institute

Cris Deritis Director Moody's Analytics