



October 24, 2014

Federal Housing Finance Agency
Division of Housing Mission and Goals
400 7th Street, S.W.
Washington, DC 20024

Sent via FHFA.gov

Dear FHFA staff:

I am writing to comment on the 2015-2017 Multi-family Housing Goals for the Enterprises, Fannie Mae and Freddie Mac. Specifically, I would like to comment on whether multifamily housing goals credit should be allowed for blanket loans on manufactured housing communities.

ROC USA strongly supports the inclusion of manufactured home communities (aka Land-lease Communities) in the affordable housing goals. Land-lease Communities (LLC) are a significant source of affordable homeownership for low and moderate income households.

For credit, these LLC should simply demonstrate serving low- and very low-income households.

For adaptations to both Enterprises' products, first, underwriting criteria that limit the use of the products to high-end LLC ought to be scrutinized. Where possible, the Enterprises need to be rewarded for removing barriers to serving communities with higher percentages of low-income households.

Second, resident-owned communities – especially limited equity cooperative type association owners and buyers, which we support – will require special treatment by the Enterprises. These communities today do not have access to Enterprise financing. Removing barriers for these community owners and buyers ought to be a high priority. Further, the additional effort by the Enterprises to meet this need ought to be rewarded with extra credit.

Thank you for your interest in serving the manufactured home community market. It's a vital sector for very low, low and moderate-income homeowners.

Please feel free to contact me for further information.

Very truly yours,

/Paul Bradley/

Paul Bradley, President

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