

December 27, 2016
Federal Housing Finance Agency
400 Seventh Street, SW
Washington, DC 20219

Re: RIN 2590-AA78

Dear Sir / Madam,

CastleOak Securities, L.P. is a leading minority-owned broker-dealer with a long history of serving financial institutions, including the regulated entities, federal agencies (such as Ginnie Mae, FDIC, and NCUA), as well as supranational development banks (such as IFC and IBRD). CastleOak is one of the top minority-owned underwriters of debt issued by the regulated entities, and has consistently listed by Black Enterprise magazine as one of the top African-American owned investment banking firms in the nation.

CastleOak welcomes the opportunity to comment on the proposed Minority and Women Inclusion Amendments. Although our firm is relatively young, having been founded ten years ago, many of our professionals have worked with regulated entities and federal agencies most of our professional lives. As such, we believe that we bring a unique perspective to many of the issues raised by the Amendments. Furthermore, we have been working closely with many of the regulated entities on creating and implementing initiatives for improving inclusion and utilization, resulting in a number of success stories across multiple products and business areas.

CastleOak supports the proposed amendment and applauds FHFA for its continuing efforts to implement the requirements of the Housing and Economic Recovery Act of 2008, Section 1116. Furthermore, CastleOak would like to express its support for the comment letter submitted by the National Association of Securities Professionals, including the following proposed changes that were detailed in their letter:

1. Make reaching the diversity goals set in the regulated entities' strategic plans one of the factors used in determining executive compensation levels.
2. Require that the regulated entities publicly disclose their annual diversity & inclusion reports.
3. Add the phrase "and transactions" to section 1207.2(b), such that the pertinent phrase reads "in all businesses, activities, and transactions".
4. Revise section 1207.21(b)(3) to include service providers, reading "Give consideration to minority-, women-, and disabled-owned businesses when reviewing contract proposals and service providers as required under section 1207.2(c);"
5. Revise Section 1207.1 and 1207.21(d) to include references to minority-, women-, and disabled-owned businesses.

CastleOak strongly believes that the changes proposed by NASP will strengthen and clarify the regulation where needed and will promote a greater adherence by the regulated entities to the letter and spirit of the law.

Sincerely,

