



April 23, 2018

Submitted Electronically

Alfred M. Pollard, General Counsel
Attn: Comments/RIN 2590-AA83
Federal Housing Finance Agency
400 Seventh Street SW
Eighth Floor
Washington, D.C. 20219

**Re: Affordable Housing Program Amendments Proposed Rule
Request for comment period extension
RIN 2590-AA83**

Dear Mr. Pollard:

The National Association of Home Builders (NAHB) is writing to request additional time to comment on the Federal Housing Finance Agency's (FHFA) proposed Affordable Housing Program Amendments (Proposed Rule) issued on March 14, 2018, with a 60-day comment period ending May 14, 2018.

NAHB is a Washington-based trade association representing more than 140,000 member firms involved in all aspects of single family and multifamily residential construction. Many of NAHB's multifamily members use a mix of techniques to finance affordable multifamily rental housing, including federal and state government programs such as Low Income Housing Tax Credits. NAHB's members also benefit when programs provide homebuyers with downpayment and closing cost assistance to facilitate access to home purchases.

The Federal Home Loan Banks' (FHLBank) Affordable Housing Program (AHP) is a means for home builders and developers to access financing for the purchase, construction and rehabilitation of rental housing as well as provide subsidies for homeownership and rehabilitation by families with incomes at or below 80 percent of area median income. These financing options are important contributions to ensure a broad housing finance market. NAHB looks forward to working with our members to provide FHFA substantive feedback on the proposed amendments to the AHP. However, the complexity and magnitude of the revisions make the 60-day comment period an extremely difficult timeframe in which to assess and respond to the proposal.

For these reasons, NAHB respectfully requests that the conclusion of the comment period be extended at least an additional 30 days to June 14, 2018.

We appreciate your consideration of this request.

Sincerely,

A handwritten signature in cursive script that reads "Michelle C. Hamecs".

Michelle (Chellie) Hamecs
Vice President, Housing Finance