

May 24, 2018

Alfred M. Pollard  
General Counsel  
Federal Housing Finance Agency  
400 Seventh Street S.W.  
Washington, D.C. 20219  
Attention: Comments/RIN 2590-AA83

**Re: Notice of Proposed Rulemaking – Affordable Housing Program**

Dear Mr. Pollard:

On behalf of the Georgia Bankers Association and our member banks that are shareholders in the Federal Home Loan Bank of Atlanta, I am writing to express concern regarding the Federal Housing Finance Agency's (FHFA) notice of proposed rulemaking published in the Federal Register on March 14, 2018. In this notice, the FHFA is proposing to amend its regulation on the Federal Home Loan Banks' (FHLBanks) Affordable Housing Program (AHP).

While we appreciate the FHFA's work to support modernization of AHP, we are concerned with the outcomes framework as envisioned by the proposed rule. We had understood that the proposed rule would provide FHLBanks with more flexibility in their scoring methodologies to allow AHP to adapt to the changing landscape of housing needs in local districts. However, the outcomes framework prioritizes FHFA's overall housing goals, resulting in less flexibility, less transparency, and a more complex process for selecting projects for AHP funding. The unintended consequence of this approach is that it has the potential to severely restrict FHLBank discretion in addressing local housing needs.

AHP is a critical source of funds for housing development and should be flexible enough to support the projects needed in the communities served by our members. While the present AHP rules present challenges in addressing unique local housing needs, they do allow FHLBanks to quickly and sufficiently respond to local needs, encourage all project types to apply for AHP funding, and maintain program transparency. In contrast, the new outcomes framework introduces a complex award structure that runs counter to the rule's stated objective of providing more flexibility. Since the proposed rule would require a significant percentage of AHP funds to be awarded to certain types of projects and sponsors, the outcomes framework will become the de facto scoring and needs allocation in each FHLBank district, creating a national, prescriptive program that may not allow individual FHLBanks the flexibility to address the particular needs of local communities. This will ultimately make AHP a less attractive funding resource.

In light of the concerns outlined here, we respectfully ask that you reconsider the proposed rule with regard to the required outcomes framework. If you have any questions, please feel free to give me a call.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Brannen".

Joe Brannen  
President & CEO