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Authorized Signer
Chase Community Development Banking

June 12, 2018

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

**Re: Notice of Proposed Rulemaking and Request for Comments –
RIN 2590-AA83 – Affordable Housing Program Amendments**

Mr. Pollard,

Thank you for the opportunity to comment on your recent notice of proposed rulemaking regarding the Affordable Housing Program (AHP) of the Federal Home Loan Banks (FHLBanks).

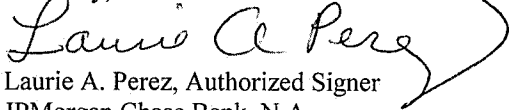
Through its membership in the Federal Home Loan Banks of Chicago, Pittsburgh, and Cincinnati, JPMorgan Chase Bank, N.A. (JPM) and its affiliates have been able to sponsor organizations for grants through the Federal Home Loan Bank Affordable Housing Program. It is through this program that JPM has been able to assist in the financing of thousands of quality units of affordable housing for developments located throughout the U.S.

The proposed amendment to the AHP is of concern to JPM as it establishes a more restrictive scoring system than the scoring system currently in place and will not allow each FHLB to be flexible in its scoring criteria in order to meet the needs of each district. Of special concern is the ability of developments to meet two of the three regulatory priorities, especially if a development focuses primarily on tenants with incomes of 60% of the area median income, without special needs, and is located in an urban area. Housing for tenants of such developments is in great demand in higher income urban areas.

The current scoring system allows district priorities to be achieved by awarding extra points for these categories, but does not mandate that projects meet these requirements. Mandating the priorities as proposed under the AHP amendment will reduce the number of developments that will score competitively to be awarded an AHP grant. Any amendments to the AHP should encourage the maximum creation of affordable housing and not discourage it. JPM would propose that the current scoring based system for the Federal Home Loan Banks be maintained.

We commend the FHFA for working to modernize the AHP regulation. However, in light of the concerns outlined above, we respectfully request that you reconsider parts of the proposed amendments, especially the required outcomes framework. Thank you for taking our comments on this very important subject into consideration. If you have any questions, please feel free to contact me at 585-797-2807 or laurie.a.perez@chase.com.

Sincerely,



Laurie A. Perez, Authorized Signer
JPMorgan Chase Bank, N.A.