

From: [Becky Cole](#)
To: [#FHFA.REG-COMMENTS](#)
Cc: [James Baron](#)
Subject: [EXT] Comments/RIN
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I am wanting to comment on the proposed rule 2590-AB04.

First of all, it's a bit confusing to consider 80% AMI to be "low income" without any further delineation or definition on where or how you are applying AMI. For example, are you using HUD's definition or the Department of Labor's? Or something else altogether?

There's another layer of this that is misleading, especially if you are using HUD's definition because in that case the AMI can fluctuate at any point during the calendar year.

Second, you said you want to make the Enterprise levels for 2021 the same as for 2018 to 2020, but your chart stops at 2019 and most of that column is not filled in.

I understand that this is for the solvency of the Enterprise agencies, but what other options are you offering for the solvency of multi-family housing providers who are in need of a resource to remain solvent, as well?

Thank you,

Becky A. Cole
Chief Capacity Builder
Problems become opportunities when the right people join together
GATHERMN.org
2168 7th Ave #923
Anoka, MN 55303-1713