

November 27, 2023

Mr. Clinton Jones  
General Counsel  
Federal Housing Finance Agency  
400 Seventh Street, SW  
Washington, DC 20219

Attention: Comments/RIN 2590-AB30 (Exception to Restrictions on Private Transfer Fee Covenants for Loans Meeting Certain Duty to Serve Shared Equity Loan Program Requirements)

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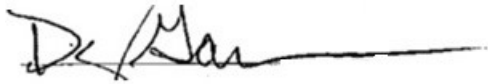
Dear Mr. Jones:

The Federal Home Loan Mortgage Corporation (“Freddie Mac”) appreciates the opportunity to provide comments on the Federal Housing Finance Agency’s (“FHFA”) Notice of Proposed Rulemaking Exception to Restrictions on Private Transfer Fee Covenants (“PTFC”) for Loans Meeting Certain Duty to Serve Shared Equity Loan Program Requirements (“Proposed Rule”). Freddie Mac supports FHFA’s Proposed Rule to amend the definition of “excepted transfer fee covenant” to add as an exception a PTFC that encumbers a property for which a shared equity loan meets the requirements for a Resale Restriction Program in FHFA’s Duty to Serve Underserved Markets Regulation (“DTS Regulation”) other than the 100 percent of area median income (“AMI”) limit.

The Proposed Rule will directly contribute to our ability to provide liquidity, stability, and affordability to the U.S. housing market and more specifically, for shared equity programs while also increasing access to credit for this underserved market. Research and our own experience show that the shared equity model is especially effective in helping to increase homeownership opportunities for first time, minority, and low- and moderate-income homebuyers. We have provided approximately \$109 million in liquidity over the past 4 years and look forward to continuing our work for such programs. Furthermore, we support FHFA’s proposal to expand the exception to restrictions on private transfer fee covenants to shared equity programs for borrowers over 100% of AMI that are outside of the requirements under 12 CFR 1282.34(d)(4)(ii) of the DTS Regulation. This expansion will help increase liquidity to this underserved market as well as advance the objective of standardizing the shared equity homeownership market.

Freddie Mac is committed to the shared equity homeownership market and we look forward to continuing our efforts to support shared equity programs under our current Duty to Serve Plan.

Sincerely,



Danny Gardner  
Senior Vice President  
Single-Family Mission & Community Engagement