From: Joyce Dillard <dillardjoyce@yahoo.com>
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To: !FHFA REG-COMMENTS
Subject: Comments on RIN 2590-AA53 Mortgage Assets Affected by PACE Programs due 3.26.2012

Any subordination disclosure is necessary as payment of mortgage debt stands a chance for default with credit risky borrowers, even non-profit corporations.

Subordination to the original loan is not a wise decision. We have seen subordinated bank loans default in Redevelopment Agency transactions. Since the local government may have a stake, then General Funds or Debt is necessary to stop any foreclosure proceedings.

Property Assessed Clean Energy Programs may not carry a return-such as Solar. If subsidies are needed, then the risk is even greater.

There is no allowance or measurement of effectiveness in PACE. The primary concern should be the mortgage debt, not the add-ons.

Energy Efficiency Programs need qualified evaluators. Is there such a program before the PACE loan.

More evaluation in energy programs need to be determined before any loans are given to help assure property values increase. This rush to Clean Energy is not necessarily the most direct way to energy efficiency.

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