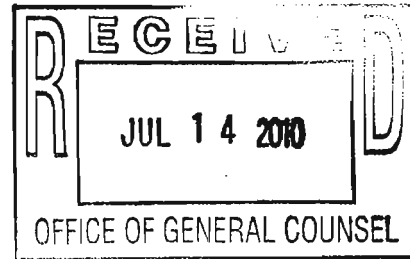


Oregon Manufactured Homeowners United (OMHU)

**P. O. Box 309
Waldport, OR 97394**



9 July 2010

Mr. Alfred M. Pollard, General Counsel
Federal Housing Finance Agency
1700 G. Street, NW, Fourth Floor
Washington D. C. 20552

RE: Comments/RIN 2590-AA27

Mr. Pollard:

We agree that the agency does not need to propose any "new products" to implement the "duty to serve" mandate regarding manufactured home communities. We also wholeheartedly agree that to guarantee underwriting of chattel is not only reckless but would also further endanger the Enterprises' financial condition and reputation.

Yet staring you in the face is a proven and safe product that should give you the impetus to move forward—the purchase of our communities by the residents themselves. Over the past 26 years the Community Loan Fund of New Hampshire and its recent national counterpart—ROC USA—have successfully facilitated the purchase of more than 100 communities without one default.

This smart and inclusive method of creating resident owned communities should be implemented today by underwriting support from the Enterprises for the simple reason that it remedies your concerns over chattel. When such communities are purchased, every home therein is titled as real property based on a non-profit cooperative basis. The buy-in is affordable and because the property is owned by those who hold shares, it guarantees that it will remain a community in perpetuity.

In addition ROC USA now has 33 states served by technical providers to ensure that due diligence in the purchase of these communities is achieved.

Those familiar mortgage products the Enterprises have traditionally employed for site-built homes would then apply to us also. Given the fact that the Enterprises have had a history of underwriting landlords in the refinancing or purchase of our communities with no strings attached, it's clearly time for our turn.

Not to employ such a strategy is to nullify the intent of the Congress of the United States when they passed this important legislation two year ago.

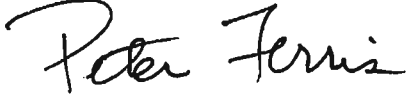
OMHU

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I can't think of any more empowering way to achieve your "duty to serve" mandate while ensuring our ability to enjoy real home ownership for the first time.

Best,

A handwritten signature in cursive script that reads "Peter Ferris". The signature is written in black ink and is positioned below the word "Best,".

Peter Ferris, Executive Director & Lobbyist
Oregon Manufactured Homeowners United (OMHU)

(541) 272-1648 (c)

Visit OMHU website at <http://omhu.org>

Visit MHOAA website at <http://mhoaa.us>