

**From:** Paul Comino [paulcomino@gmail.com]  
**Sent:** Tuesday, July 20, 2010 9:40 AM  
**To:** !FHFA REG-COMMENTS  
**Subject:** The future of Affordable Housing in the US  
July 20th

Dear Senator or Representative who is concerned about the future of affordable housing in the US,

On behalf of Evergreen Manufactured Homes LLC, I am writing to seek your assistance in serving the more than 18 million Americans served by the manufactured housing industry and respectfully ask you contact:

The Federal Housing Finance Agency (FHFA) and request they amend their recently released Enterprise Duty to Serve Underserved Markets proposed rule (75 FR32099) to include personal property lending in the duty government-sponsored enterprises (GSEs) have to serve the manufactured housing market

Leaders of the [for letters to Representatives insert: House Financial Services Committee/for letters to Senators insert: Senate Banking Committee] and ask they specifically request FHFA amend its proposed rule to consider personal property lending in the GSE duty to serve manufactured housing requirement that was outlined by Congress in the Housing and Economic Recovery Act of 2008 (HERA; P.L. 110-289)

The manufactured housing industry serves a vital segment of the housing market. Since 1989, it has accounted for 21 percent of all new single family housing sold in the United States. A significant portion of this is in the form of affordable housing, specifically:

In 2009, 43 percent of all new home sales under \$150,000 and 23 percent under \$200,000  
73 percent of manufactured households earn less than \$50,000  
45 percent of manufactured housing borrowers earn 80 percent or less of Area Median Income (AMI)

Originally established to enhance the availability, efficiency and transparency of capital in targeted, economic sectors, including housing, and to reduce the cost of credit in these sectors, government-sponsored enterprises (GSEs) Fannie Mae and Freddie Mac have had done little to support the manufactured housing market. In fact, less than one percent of their business comes from manufactured housing.

In order to increase the liquidity of mortgage investments and improve the distribution of investment capital available for mortgage financing, Congress (through HERA) specifically established a duty for the GSEs to serve underserved markets, including manufactured housing.

This service included developing loan products, flexible underwriting guidelines and a secondary market for mortgages. Congress further specified that FHFA, in assessing GSE fulfillment of this duty to serve obligation, consider loans secured by both real and personal property.

In its proposed rule, FHFA —contrary to Congressional intent—has indicated it will only consider manufactured homes loans secured by real property for purposes of evaluating whether GSE are conforming to their duty to serve the manufactured housing market requirement.

More than 60 percent of manufactured home owners have relied on a personal property loan in order to finance their home purchase. It is exceptionally difficult to faithfully serve any market if more than half of it is excluded from consideration.

It is for these reason I urge you: 1) contact FHFA and request they amend their proposed rule to consider personal property lending in GSE's duty to serve manufactured housing; and 2) contact authorization committee leaders and ask they request FHFA amend its proposed rule to include personal property lending in the duty to serve requirements Congress has outlined for GSEs.

Thank you for your consideration of this request.

Sincerely,

Paul Comino  
Evergreen Manufactured Homes LLC  
(574) 202 7070