

From: Sandy Allen [SSternoff@yahoo.com]  
Sent: Thursday, July 22, 2010 3:45 PM  
To: !FHFA REG-COMMENTS  
Subject: Request for Modification of the Enterprise Duty to Serve Underserved Markets Proposed Rule

Mr. Alfred M. Pollard  
General Counsel  
Federal Housing Finance Agency  
1700 G Street, N.W.  
Fourth Floor  
Washington, DC 20552

Re: RIN 2590-AA27

Dear Mr. Pollard:

I am the owner of two mobile home parks in the state of Washington. In both parks, my tenants rely on personal property loans to finance their houses. Without such financing, they are unable to purchase a mobile home. If new rules only provide loans that are secured by real property, it shuts the door for people wanting to purchase a mobile home, often their only alternative if they have had their "stick-built" home foreclosed upon or they cannot afford a stick-built home.

The Housing and Economic Recovery Act of 2008 (HERA; P.L. 110-289), initial rules developed by the Federal Housing Finance Agency (FHFA) do not fully reflect congressional intent on the duty government-sponsored enterprises (GSEs) have to serve the manufactured housing market.

HERA tasked the GSEs with developing loan products, flexible underwriting guidelines and a secondary market for mortgages for very low-, low- and moderate- income families for three underserved markets: 1) manufactured housing; 2) rural housing; and 3) affordable housing. Congress further specified that FHFA, in considering whether GSEs have fulfilled their duty to serve obligation, consider loans secured by both real and personal property.

In its proposed rule, FHFA indicates it will consider only manufactured homes loans secured by real property for purposes of the duty to serve the manufactured housing market requirement. We feel this decision misinterprets legislative intent as well as industry realities with respect to the prevalent role personal property lending plays in the manufactured housing market.

Since 1989, manufactured housing has accounted for 21 percent of all new single family housing sold in the United States, a significant portion of which is in the form of affordable housing.

More than 60 percent of manufactured home owners have relied on a personal property loan in order to finance their home purchase. Therefore, FHFA's initial decision to exclude personal property lending considerations from the GSE's duty to serve obligation effectively eliminates more than half the market to efficiently sell their homes at any price due to the lack of available financing. In many cases, families that needed to move for family, health, job, or economic reasons have been unable to sell their homes at any price due to the lack of personal property home loans.

The decision to potentially eliminate personal property lending from GSE duty to serve requirements not only fails to serve the underserved manufactured housing market; it fails to serve the larger underserved affordable housing and rural housing markets.

It is for these reasons FHFA is urged to amend its proposed rule to also consider manufactured home loans secured as personal property towards the Enterprise duty to serve requirement.

Thank you for your consideration of these comments.

Sincerely,

Sandra Allen

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