

Dear Mr. Pollard,

July 12, 2010

Subject: Comments/RIN 2590-AA27

I have lived in a mobile home park for over 3 years now. I purchased my home around the time that the bubble in "conventional" housing burst. I had put off the purchase of a home until late in life as that life and home ownership were not compatible until recently.

With the devastating asset inflation in the conventional housing market during the bubble period, my savings, which before the bubble would have made a substantial down payment on a home, were, by 2007, woefully inadequate in terms of my being able to secure a mortgage on a modest home at an affordable monthly payment. I simply could not afford conventional housing in that market.

My savings did however cover the cost, in full, of the home in which I currently reside. I would have preferred to finance my purchase and maintain my savings as a cushion against the unforeseen, but people like me who make the housing choice I've made, do not have that option.

One would think that the Federal Housing Finance Agency would have addressed this problem in the distant past so that low income buyers of manufactured homes whose home will be sited on a leased lot within a mobile home park, would have the same access to money markets as any other home buyer.

The FHFA has newly proposed guidelines which supposedly address the lack of service to underserved markets by the financial industry. However, these guideline proposals cover only that manufactured housing which will be sited on a lot sold as part of the housing purchase. Those who make the housing choice which I have, the purchase of a home on a leased lot, must still have cash. Should I ever decide to sell my home, I must find a cash buyer.

Mobile home parks represent largest asset of unsubsidized affordable housing our nation possesses. The guideline proposals now being considered by the FHFA omit mention of a housing market which I believe will experience increasing demand during the difficult days ahead.

During these times of high unemployment, under employment and high foreclosure rates, a serious effort by the FHFA to facilitate financing of the most affordable type of housing is long overdue.

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