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Public Comments on Enterprise Duty to Serve Underserved Markets:=====

Title: Enterprise Duty to Serve Underserved Markets

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Submitter Info:

- ? The proposed rule automatically eliminates more than two-thirds of the manufactured housing market from DTS by excluding homes financed as personal property (i.e., chattel financing) and land-home packages;
- ? The proposed rule excludes the industry's most affordable products from DTS and will enable continued discrimination by the Enterprises against very low, low and moderate-income consumers of manufactured housing;
- ? The proposed rule favors higher-income purchasers and higher-cost homes at the expense of the very low, low and moderate-income manufactured housing consumers that Congress intended the Enterprises to serve under DTS;
- ? The proposed rule restricts the implementation of DTS based on claimed "consumer protection" issues that are unrelated to the DTS mandate and the core functions of either the Enterprises or FHFA;
- ? The proposed rule allows the Enterprises to establish their own DTS goals and benchmarks, even though it was the failure of the Enterprises to properly serve the manufactured housing market that led to the DTS mandate in the first place;
- ? The proposed rule establishes no substantive FHFA standards, criteria or parameters to be met by the Enterprises;
- ? The proposed rule sets no fixed criteria for determining compliance with DTS, effectively allowing the Enterprises to define their own compliance;
- ? The proposed rule is inconsistent with national housing policy as set forth in the Manufactured Housing Improvement Act of 2000.