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May 14, 2009

**Mr. Alfred M. Pollard, General Counsel**  
**Attention: Comments/RIN 2590-AA25**  
**Federal Housing Finance Agency**  
**Fourth Floor**  
**1700 G Street, NW**  
**Washington, DC 20552**

Dear Mr. Pollard:

The nation's leading nonprofit lenders play a significant role in financing affordable rental housing in the United States. The ongoing credit crunch has unfortunately hindered lenders' ability to finance additional rental housing just when such housing is most needed. The FHFA proposed rollback of GSEs' multifamily Special Affordable goals undermines economic recovery.

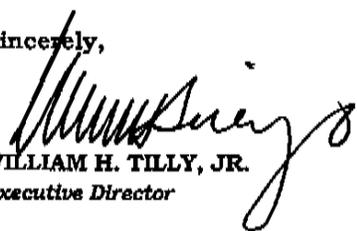
Fannie Mae and Freddie Mac - still the largest sources of mortgage finance capital in the United States - should be part of the solution to stabilizing communities by purchasing performing, seasoned multifamily mortgages now held in portfolio by conventional lenders. With a new supply of capital from the sale of assets to the GSEs, lenders could finance thousands more affordable rental units and assist many banks in meeting new federally mandated capital levels as well as enhance GSE current portfolios. Your proposal to reduce the enterprises' 2009 affordable housing goals to their 2004-2006 levels only exacerbates lenders' liquidity crisis, limiting ability to meet the housing needs of a growing number of families.

Nonprofit lenders such as my organization are blue-chip multifamily CDFIs serving areas as diverse as New York, Alabama, Massachusetts, California, and the Carolinas. For decades we have made mortgages on communities that low and moderate income families are proud to call home. With no troubled assets and most never suffering a loss on a loan, we have successful track records of pooling private capital to finance affordable rental housing.

Over \$50 billion of these performing "community development loans" were originated annually in 2005, 2006, and 2007. The proposal to set the enterprises' 2009 bar at only \$9 billion in affordable multifamily loans is a significant step backward.

We urge you to reconsider your proposal regarding the enterprises' 2009 affordable housing goals, and look forward to working with you to increase the flow of private capital to low- and moderate-income individuals and underserved communities, on fair terms.

Sincerely,

  
WILLIAM H. TILLY, JR.  
Executive Director

cc: Sen. Richard Shelby, R-AL