



June 16, 2008

Federal Housing Finance Board
1625 Eye Street, NW
Washington, DC 20006
ATTENTION: Public Comments

To Whom It May Concern:

The Conference of State Bank Supervisors (CSBS) appreciates the opportunity to comment on the Federal Housing Finance Board's proposed revisions to the Affordable Housing Program (AHP) regulation. CSBS supports the proposal to authorize the Federal Home Loan Banks to establish AHP homeownership set-aside programs for the purpose of refinancing or restructuring eligible nontraditional or subprime owner-occupied mortgage loans.

The current downturn in the residential mortgage market and poor underwriting has contributed to record foreclosures. The magnitude of the problem will require numerous innovative solutions. CSBS is committed to promoting long-term foreclosure prevention initiatives in an attempt to keep homeowners in their homes. Therefore, we support the Finance Board's efforts to assist consumers with nontraditional or subprime mortgages by temporarily extending the authority to use AHP direct subsidy to refinance or restructure mortgages to each Federal Home Loan Bank.

We appreciate the Finance Board's leadership and creativity in identifying a reasonable and viable solution, utilizing existing funds. State authorities look forward to working with the Finance Board and the Federal Home Loan Banks to mitigate foreclosures and to assist homeowners.

Best regards,

Neil Milner
President & CEO

CONFERENCE OF STATE BANK SUPERVISORS