

Exhibit H:
Annual Outreach Narrative Reporting Template

FREDDIE MAC

MANUFACTURED HOUSING COMMUNITIES

2018 REPORT

EVALUATION AREA: OUTREACH

ACTIVITY:

Activity 3 – Manufactured Housing Communities Owned by a Government Entity, Non-Profit Organization, or Residents: Regulatory Activity

OBJECTIVE:

Objective A: Promote understanding of the Resident Owned Community market

ACTIONS:

In 2018, Freddie Mac exceeded our planned actions under this objective. We identified Resident Owned Communities (ROCs) across the country and commissioned a survey to better understand both the make-up of communities across the country and—in excess of our plan—their financing needs. The survey covered all 50 states and, to our knowledge, is the most comprehensive ever conducted. Without this research, the size and scope of the ROC market is not well understood.

Since there is very limited data on the prevalence of ROCs across the country, this task was remarkably difficult. We created our own dataset on the ROC market using internal resources through a rigorous and time-intensive process that included hundreds of internet searches and real estate websites. When more conventional search methods did not yield sufficient results, we examined Google satellite imagery to locate any type of manufactured home community and manually determine if they were resident owned, often by looking for signage that would suggest the community's ownership structure. We then sought contact information for all the ROCs we identified. Although this process was time consuming and labor intensive, the level of ROC data we obtained would not otherwise have been possible. The end result is the most comprehensive dataset of ROCs that is currently available, with over 1,000 ROCs. This work was a critical foundation for further work; we could not survey the market without knowing who and what constitutes that market.

Once the dataset of ROCs was compiled, we commissioned a market research firm that specializes in web and phone surveys to assist us in conducting a survey of the ROCs. A letter was mailed to each ROC indicating they would be contacted by telephone to take part in the survey, along with instructions on how to complete the survey online if they chose to do so. In addition, we leveraged our relationship with ROCUSA to encourage their member communities to take part in our survey, as well as to provide additional data on communities they helped finance.

The survey will help enable a broader understanding of the market, set a foundation for attracting more capital, and help bring standards and more technical assistance to these communities. Indeed, it works in conjunction with the development and use of our ROC loan offering in 2018. Now that we have a formal offering, it is necessary to market it to ROCs. Because this market is so small, and ROCs are generally of small size (and therefore likely to need only small loans), putting in the extraordinary effort to find and finance them is not likely to be economically attractive to lenders. Our research will enable us to direct our OptigoSM lenders to more likely opportunities for financing ROCs so they can better apply their resources to financing rather than finding communities.

Planned Actions	2018 Actions
<p><i>Design and commission research on ROC market size, ownership structures of MHCs and market needs. Survey will cover all 50 states and include at least the following data points, if available:</i></p> <ul style="list-style-type: none"> <i>a. Location</i> <i>b. Ownership type</i> <i>c. Community size (total number of pad sites)</i> <i>d. Percent resident owned</i> <i>e. Percent of community as rental units</i> <i>f. Length of resident ownership period</i> <i>g. Age of community</i> <i>h. Whether community has debt financing</i> <i>i. Property value</i> <i>j. Pad rents</i> <i>k. Community fees</i> <i>l. Age restrictions</i> <i>m. Rent restrictions</i> 	<p><i>In the early stages of 2018, we outsourced the research portion of this objective to an external vendor. After taking steps to complete the requested research, the organization determined the scope and level of detail required to fulfill this objective was not feasible. As a result, we repositioned our work and decided to handle the research and survey components internally.</i></p> <p><i>Our survey included all of the following:</i></p> <ul style="list-style-type: none"> <i>a. Location</i> <i>b. Ownership type</i> <i>c. Community size (total number of pad sites)</i> <i>d. Percent resident owned</i> <i>e. Percent of community as rental units</i> <i>f. Length of resident ownership period</i> <i>g. Age of community</i> <i>h. Whether community has debt financing</i> <i>i. Property value – Once a community converts to resident ownership community, value is not important (and therefore unknown) since ROCs do not trade (can't be bought or sold), unless they revert to a more traditional rental community</i> <i>j. Pad rents</i> <i>k. Community fees</i> <i>l. Age restrictions</i> <i>m. Rent restrictions</i> <p><i>In addition, we went beyond our Plan to request the following to better understand how we might support these communities over time:</i></p> <ul style="list-style-type: none"> <i>▪ Factors that contributed to a positive lending experience with their respective financier</i> <i>▪ Factors that the community might look for in a loan product</i> <i>▪ Typical terms, typical mortgage rate, and level of difficulty to receive financing</i> <i>▪ Feedback on how pleased borrowers were with their financing experience, in general</i> <p><i>As noted above, we provided a monetary incentive to encourage participation and help increase survey response rate.</i></p> <p><i>We also conducted outreach to PMC Financial Services, Floridaroc.com, ROCUSA and JLT/Datacomp to help increase the breadth of our survey.</i></p>

SELF-ASSESSMENT RATING OF PROGRESS:

Select the category that best describes progress on this objective for the year.

- Objective met
- Objective exceeded
- Objective partially completed:
 - 75-99% (substantial amount)
 - 50-74% (limited amount)
 - 25-49% (minimal amount)
 - 1-24% (less than a minimal amount)
- No milestones achieved

PARTIAL CREDIT JUSTIFICATION:

N/A

IMPACT:

Provide a self-assessment of the level of impact that actions under the objective have accomplished.

- 50 – Substantial Impact
 40
 30 – Meaningful Impact
 20
 10 – Minimal Impact
 0 – No Impact

IMPACT EXPLANATION:

Answer the following questions.

1. How and to what extent were actions under this objective impactful in addressing underserved market needs or laying the foundation for future impact in addressing underserved market needs? (Character limit: 3,000 characters, including spaces)

This research is truly the first-of-its-kind and establishes a foundation for future growth in the ROC market. Prior research into the ROC market focused on specific or localized cases and not a national view of the market, its challenges, and the opportunities for financing. This research aids in defining the ROC market and its characteristics and lays the foundation for greater use of Freddie Mac loan offerings over time. This survey directly impacts Freddie Mac's future loan purchases and product development and will set a baseline for the size of the ROC market and enable us to direct our Optigo lenders to support ROCs. This is fundamental to both providing liquidity to the ROC market and to supporting the creation of more ROCs over time.

Not only is the market for ROCs unknown, but it is likely that a large percentage of ROC community owners are unaware of the financing options that may exist. We have taken on this research effort to bridge the gap between lenders and communities. Since this is such a specialized market, ROCs often receive little attention from major players in the market. Our research will shed a light on a market that has not yet been explored. This survey and the resulting report will reveal the typical debt financing options that these communities utilize, which will allow us, and our network of lenders, to tailor our products to align to their needs.

It is important to note that this research objective is a multi-year effort and the impacts will be seen over the coming years as we disseminate our findings. In 2018, it was our ambitious objective to survey the ROC market, while in 2019 we plan to publish a report including a summary of survey results, an estimate of the overall market size and characteristics, geographic distribution of ROCs, analysis of ROC ownership structures, as well as a description of best practices and new standards that will enable future loan purchases. We also intend to include any lessons learned for our ROC loan purchases.

2. Optional: How do actions under this objective support future actions detailed in the Plan for the underserved market? If there have been any changes in the planned next steps or timeline for work under or related to this objective, describe the changes and provide a brief explanation. (Character limit: 1,500 characters, including spaces)

This survey is a prerequisite to the work we are undertaking in 2019 and 2020. As mentioned above, prior to this survey, comprehensive research on the ROC market did not exist. Through the preliminary research and the resulting questionnaire to all the ROCs, we are establishing a baseline for the size of this market. We will publish this information as part of a more comprehensive report in 2019.

This research goes hand-in-hand with the development and use of our ROC loan offering in 2018. Now that we have a formal offering, it is necessary to market it to ROCs. Because this market is so small, and ROCs are generally of small size (and therefore likely to need only small loans), putting in the extraordinary effort to find and finance them is likely less economically attractive to lenders than executing larger, easier to find transactions. Our research will enable us to direct our Optigo lenders to more likely opportunities for financing ROCs so they can better apply their resources to financing, not finding, communities.

3. **Optional:** Are there any market factors that adversely impacted the actions under this objective? If so, describe. (Character limit: 3,000 characters, including spaces)

There is a profound and fundamental challenge in surveying and analyzing the ROC market nationwide: finding ROCs.

There is not a listing of ROCs around the country to analyze, nor are there necessarily listings in each state. In addition, even when we were able to find ROCs, contact information was unavailable or inaccurate in many cases. Additionally, at the outset of our research, we sought to engage a third-party firm expert in the MHC market. After engaging in research for several months, they determined that the task was infeasible. As a result, we took the work on with internal resources, often using extraordinarily labor-intensive measures. First, we used internet searches based on various keywords in each state. Then we used Zillow searches for manufactured home sales to try to locate communities in which they were sold. We sought data from state business licensing agencies on mobile home communities to try to identify ROCs. When we saw that these methods were not yielding sufficient results, we used Google satellite imagery to search for any type of mobile home community, both through the search bar and visually. Upon locating a new park, we accessed the street view and inspected the community for indication of resident ownership (often if a park is resident owned, they would indicate that on the entrance to the park). This was extremely labor intensive but resulted in the identification of many smaller communities that would not have been found otherwise. Finally, we used data from some known incomplete data sources from third-parties.

Once we identified as many ROCs as possible, we engaged our corporate research team and an external survey firm to develop a survey and contact ROCs directly. The survey was mailed out to ROCs with a weblink, informing them that they may be called to participate in the survey. If the survey had not been completed online within two weeks, the team followed up with a phone call to conduct the survey. To help promote the response rate of our survey, we offered a monetary incentive for all respondents who completed the survey. In addition, we leveraged our relationship with ROCUSA who supported our efforts by emailing their member communities and encouraging them to take part in the survey. Even with these efforts, we have seen challenges such as incorrect contact information, inability to reach a community representative or unwillingness to respond to the survey.

Despite these challenges, our research, and this survey, has accomplished more than any other industry participant or research has in the past, and we are laying a foundation for ROC market study and development that has never been laid before.

4. **Optional:** How did the actions under this objective contribute to increased or future loan purchases for the underserved market? (Character limit: 1,500 characters, including spaces)

Today, financing for ROCs is generally provided by CDFIs or banks using specialized products that often require considerable leverage with combined loan amounts in excess of the appraised value of the property. Additionally, these loans have limited secondary market outlets, which is one of many factors contributing to the relatively small size of this market.

This research helps to broaden the market for financing ROCs in two ways. First, as described above, it helps Freddie Mac direct our Optigo lenders to financing opportunities, which will lead to loan purchases by Freddie Mac. Second, it helps with the creation of new ROCs. Once published, our survey of the market along with best practices will help technical assistance providers, who support the creation of ROCs as they convert from investor-owned communities and support communities throughout their operations, connect with existing ROCs and identify states where they may seek to expand their footprint to reach more existing and potential communities, as states that have a larger number of ROCs are more likely to support future ROCs. This can lead to future loan purchases by Freddie Mac using our MHROC loan offering developed in 2018.

Attach the information detailed in the list of documentation specific to the objective that was provided by FHFA.

Exhibit D:

Second Quarter Outreach Narrative Reporting Template

FREDDIE MAC

MANUFACTURED HOUSING COMMUNITIES

2Q REPORT

EVALUATION AREA: OUTREACH

ACTIVITY:

Activity 3 – Manufactured Housing Communities owned by a Government Entity, Non-Profit Organization, or Residents: Regulatory Activity

OBJECTIVE:

Objective A: Promote understanding of the Resident Owned Communities market

Understanding the size and distribution of the ROC market is important to attracting investment and helping this market grow. In our Plan we intended to design and commission a 50 state survey of the market. However, current efforts by the intended vendor did not deliver sufficient information in a timely fashion, so we have repositioned our work. We are now surveying the market ourselves from a variety of data sources and conducting outreach to industry leaders. We have directed considerable effort especially on those states with the largest concentration of MHCs (California and Florida, for example), and those with a known concentration of ROCs (such as New Hampshire), as they provide the greatest and most efficient insight into market trends, and we will extend our analysis from there to include all 50 states this year.

While we adjusted our survey method, we still anticipate meeting or exceeding the intended goal of the analysis—to enable a broader understanding of the market, set a foundation for attracting more capital, and help bring standards and more technical assistance to these communities—by providing a best-in-class understanding of the state and size of the ROC market.

ACTIONS:

Action Category	Action Reference – Activity 3; Objective A	Status
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Market Actions	Action 1 A-M	Design and commission research on ROC market size, ownership structures of MHCs and market needs – In Process
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SELF-ASSESSMENT RATING OF PROGRESS:

Select the category that best describes progress on this objective for the reporting period.

- On-target to meet or exceed the objective
- Progress delayed and/or partial completion of the objective expected
- Unlikely to achieve any milestones of the objective

ADDITIONAL INFORMATION (IF APPLICABLE):

N/A