October 28, 2014

RE:   2015-17 Enterprises Housing Goals Doc # 2014-21118

The National Association of Real Estate Brokers Investment Division-Housing Counseling Agency (NID) has been a active partner to Fannie Mae and Freddie Mac (the Enterprises), their lender and Private Mortgage Insurance (PMI) partners since 1985. Working together with our parent organization, National Association of Real Estate Brokers (NAREB) by 1989 this partnership developed the convention home mortgage industries "Community Homebuyers Mortgage Program", the housing industries first national fair and affordable housing homebuyer and mortgage borrower education and counseling program.

The 1992 GSE Reform legislation created affordable housing goals for the Enterprises and the FHLB's which, in part, created the opportunity for NID to work with the GSE's to target and expand our face to face holistic housing counseling services to communities with at least 30% minority populations and CBO's FBO's and local and state government agencies serving the housing and community development needs of these communities and populations. These demographics represent the target markets that NAREB and its affiliate organizations have served on a national bases since 1947 and key urban markets since 1925. Social and economic development through fair and affordable housing opportunities can best be achieved through the availability of fair and affordable conventional mortgage capital to underserved populations and communities. The FHFA proposed Enterprises goals for 2015-17 represent, in part, an effective frame work to restore access to conventional mortgage capital to our target markets and populations that has been severely restricted since the financial crisis of 2008.

Several recent key related studies and data produced by the Urban Institute-10-2014, Assessing the Proposed Housing Goals; 2013,Center for Housing Studies Harvard University; 2013 HMDA; 2013, Center for Responsible Lending confirm that African American and Hispanic families and communities with at least 30% minority populations remain grossly disproportionately served by conventional mortgage capital.  NID offer the following recommendations to the FHFA proposed 2015-17 housing goals for the Enterprises.

Mandate HUD Approved Housing services for all very low and low income one to four unit home buyers and mortgage borrowers as defined in the 2015-17 proposed goals. Develop credit enhancements to mortgage borrowers who successfully complete the required HUD approved counseling through reducing exposure to Enterprises lender buyback and capital reserve rules and reduce the guarantee fee by 25% for the target mortgages.  Increase the low-income

refinancing goal from 27% to 35% to reduce the unnecessary displacement and loss of potential wealth building of homeowners with Enterprises guaranteed mortgages.

Maintain the current benchmark and retrospective market regulation for single family goal performance while developing with the HUD Offices of Housing Counseling and Fair Housing a more robust review of goal performance under the regulation. This recommendation will help restore public and congressional confidence in the public purpose of the Enterprises regardless of their future status.

NID supports the proposed multifamily housing goals with special gratitude for the small multifamily housing development considerations.

NID supports the proposed improved oversight and review of the single family rental housing mortgage purchases by the Enterprises.

NID and our network of 54 branch offices located in 22 states has served more than 700,000 homeowners faced with losing their homes and 500,000 potential home buyers the past six years.  Ninety percent of our clients receive face to face long term counseling and 95% of our clients are African American and Hispanics living in low to moderate income urban communities.

We welcome the opportunity to continue our working partnerships with FHFA and the Enterprises to achieve their existing and proposed affordable housing goals in a safe, sound and transparent manner.

Thank you,

*Ray Carlisle*
Ray Carlisle
President

Cc:  NID Board of Directors
     NAREB Board