

July 17, 2026

Mr. Clinton Jones
General Counsel
Federal Housing Finance Agency
400 7th Street SW
Washington, DC 20219

Attention: Comments / RIN 2590-AB64

Dear Mr. Jones,

The undersigned national associations represent for-profit and non-profit owners, operators, developers, lenders, property managers, real estate professionals and housing cooperatives involved in the provision of affordable housing. We are writing to request that FHFA extend the comment deadline for the proposed rule, “Enterprise Duty to Serve Underserved Markets, RIN 2590 – AB64” from 30 to 60 days.

We generally agree that the Federal National Mortgage Association (Fannie Mae) and the Federal Home Loan Mortgage Corporation (Freddie Mac) (collectively the Enterprises) need more flexibility to meet their statutory Duty-to-Serve (DTS) very-low, low- and moderate-income families in the underserved Manufactured Housing, Rural, and Affordable Housing Preservation markets. In fact, many of our organizations requested changes in previous DTS comment letters that would reduce the Enterprises’ administrative burdens and permit greater innovation in their DTS initiatives.

We are actively working on our respective comment letters; however, the proposed rule makes several major substantive policy changes that warrant more than 30 days to analyze. These changes include, but are not limited to:

- New rules for using median income;
- New definitions for each of the Manufactured Housing, Rural and Affordable Housing Preservation Markets;
- Changes to the Enterprises’ DTS procedures and FHFA’s compliance evaluations; and
- Treatment of blanket loans.

A 30-day extension of the comment deadline would allow us to more thoughtfully and thoroughly assess the rule’s potential impacts. We would be able to offer more confident affirmations of changes we support and more constructive suggestions for addressing aspects of the rule that may give us concern.

Thank you for your consideration. Please direct any questions about this request to [Michelle Kitchen](#), Senior Director of Multifamily Finance at the National Association of Home Builders.

Sincerely,

Council for Affordable and Rural Housing

Institute of Real Estate Management

Manufactured Housing Institute

National Affordable Housing Management Association

National Association of Home Builders

National Association of Housing Cooperatives

NATIONAL ASSOCIATION OF REALTORS®

National Leased Housing Association