



October 11, 2013

The Honorable Tim Johnson
Chairman
Senate Committee on Banking, Housing, and Urban Affairs
Dirksen Senate Office Building, SD-534
Washington, DC 20510-6075

The Honorable Mike Crapo
Ranking Member
Senate Committee on Banking, Housing, and Urban Affairs
Dirksen Senate Office Building, SD-534
Washington, DC 20510-6075

Dear Chairman Johnson and Ranking Member Crapo:

Research shows that housing consumers who have worked with housing counselors from HUD-approved housing counseling agencies have had better outcomes than consumers on their own. Homebuyers working with quality housing counseling programs have lower mortgage delinquency rates.¹ Counseled homeowners at risk of foreclosure are more likely to get a loan modification, more likely to receive a more affordable modification, and less likely to redefault.²

Anything that can be done to integrate housing counseling into the mortgage process and encourage housing consumers to participate in high quality housing counseling will benefit housing consumers, lenders, servicers, and investors by preparing homebuyers for the responsibilities of homeownership; by lowering delinquency rates and defaults; by helping homebuyers determine when and if they are ready to buy and make mortgage application; and by helping homeowners at risk of foreclosure to determine their best options, including loan modification or a graceful exit.

These proposals are designed to increase consumer access to housing counseling services, so that high value counseling is an option available to homebuyers and homeowners when they need it most – well before they need to make major financial decisions, such as signing a real estate sales agreement, making loan application, or applying for a loan modification.

Principles

Housing finance reform should increase consumer access to housing counseling by requiring or encouraging institutions working with the Federal Mortgage Insurance Corporation (or other entity that

¹ Mayer and Temkin, Pre-Purchase Counseling Impacts on Mortgage Performance: Empirical Analysis of NeighborWorks® America's Experience

² Mayer, Neil, Peter A. Tatian, Kenneth Temkin, and Charles A. Calhoun. 2010. "National Foreclosure Mitigation Counseling Program Evaluation: Preliminary Analysis of Program Effects," The Urban Institute, December.

replaces Fannie and Freddie) to work with HUD-approved housing counseling agencies. Specifically, the following principles should be incorporated into the housing finance reform legislation:

1. Improve the effectiveness of HUD-approved housing counseling agencies by integrating housing counseling into the programs of the FMIC (or other entity that replaces Fannie and Freddie):
 - Include housing counseling data fields in the Uniform Mortgage Database
 - Include housing counseling as a risk reduction tool in evaluations by the Office of Underwriting
 - Include housing counseling as an eligible activity in the Housing Trust Fund
2. Increase access and affordability in the mortgage market:
 - Establish strong affordability requirements and access for creditworthy borrowers
 - Include accessibility and affordability as explicit purposes, duties, and responsibilities of the FMIC (or other entity that replaces Fannie or Freddie)
 - Create a Market Access Fund to address the homeownership and rental housing needs of low- and moderate-income people
 - Leave underwriting to the underwriters, including not legislating downpayment amounts
 - Support programs designed to reach traditionally hard-to-serve or underserved markets
3. Incorporate measures to help homeowners at risk of default to recover and return to timely payment or exit gracefully and to improve mortgage servicing practices:
 - Require servicers to work with and support HUD-approved housing counseling agencies
 - Provide all homeowners with access to all loss mitigation options
 - Require servicers to stop engaging in improper servicing practices such as dual-tracking

Specific Wording Changes to S. 1217

Section 2. DEFINITIONS.

Leave mortgage underwriting to the underwriters, including no minimum downpayment.

Writing mortgage underwriting standards into legislation, especially when those underwriting standards are more onerous than they need to be, prevents underwriters from making safe loans to reasonably qualified borrowers. Accordingly, an “eligible mortgage” should not be required to comply with the underwriting standards included in CFPB’s Ability-to-Repay and Qualified Mortgage Rule. In particular, the requirement that a qualified mortgage may not have a debt-to-income ratio that exceeds 43% will prevent reasonably qualified borrowers from accessing mortgage credit (or else will make borrowing much more expensive for them). Many people are capable of carrying a heavier debt burden, for example renters who spend a higher percentage on rent (and have a proven history of making timely rent payments).

p. 6, lines 14-21: after the word “units” strike the remainder of subsection (A)

In the alternative, it is especially the case that borrowers who have had the benefit of pre-purchase housing counseling are able to carry higher debt-to-income ratios. Should the language linking the definition of an eligible mortgage not be eliminated, there should be some flexibility given for borrowers who have received pre-purchase counseling from a HUD-approved housing counseling agency to exceed the 43% DTI cap.

p. 6, line 14: The existing definition of “eligible mortgage” should be designated subsection (a). (Renumber subsequent subsections as needed.)

p. 10, line 4: insert new subsection (b): “(b) The requirement in subsection (a)(1) that an eligible mortgage comply with the provisions of section 1026 of title 12 of the Code of the Federal Register, as promulgated by the Bureau of Consumer Financial Protection pursuant to section 129C(b) of the Truth in Lending Act (15 U.S.C. 1639c(b)) notwithstanding, an eligible mortgage may have a debt-to-income ratio that exceeds 43 percent provided the borrower has received qualifying pre-purchase housing counseling from a HUD-approved housing counseling agency.”

Additionally, the provision mandating a 5% minimum downpayment should be removed. Mortgage underwriting should be done by the lender rather than through legislation. If the downpayment minimum is retained, borrowers should be able to go below the 5% minimum when they have successfully completed a HUD-approved housing counseling agency program.

p. 9 lines 7- 9: strike subsection (D) in its entirety OR add new subsection (c) following new subsection (b): “The requirement in subsection (a) that an eligible mortgage have a downpayment equal to not less than 5 percent of purchase price of the property securing the mortgage notwithstanding, an eligible mortgage may have a downpayment of less than 5 percent provided the borrower has received qualifying pre-purchase housing counseling from a HUD-approved housing counseling agency.”

Definition of Housing Counseling

p. 12, line 4: insert new subsection (12): “(12) HUD-APPROVED HOUSING COUNSELING AGENCY—The term ‘HUD-approved housing counseling agency’ means a HUD-approved housing counseling agency, as defined under section 214.3 of title 24 of the Code of Federal Regulations.” (Renumber subsequent sections as needed.)

Section 101. ESTABLISHMENT.

Include Ensuring Accessibility to Affordable Mortgage Credit for All Reasonably Qualified Borrowers as an Explicit Purpose of the FMIC

Ensuring the accessibility of affordable mortgage credit for all reasonably qualified borrowers, especially low- and moderate-income borrowers and borrowers from traditionally hard-to-serve or underserved markets, should be an explicit purpose of the FMIC. Pledging the full faith and credit of the United States to the insurance sold by the FMIC to private market participants should be accompanied by the requirement that the FMIC also serve the public purpose of ensuring access to affordable mortgage credit

for all reasonably qualified borrowers, especially low- and moderate-income borrowers and borrowers from traditionally underserved communities.

p. 13, line 15: strike “.” and insert “;”

p. 13, line 16: insert new subsection (3): “(3) provide liquidity for mortgages that further the purposes of the Community Reinvestment Act and other regulatory or statutory requirements for which primary market originating lenders are responsible and support access to credit in traditionally hard to serve or underserved markets.”

Sec. 103. BOARD OF DIRECTORS.

More inclusive board membership

p. 17, line 16: replace “5” with “7”.

p.17, line 19: replace “4” with “6”.

p. 18, line 14: strike the word “and”.

p. 18, line 20: remove period after “multifamily housing development and add “;”, then on next line add “(v) 1 of whom shall have a demonstrated technical, academic, or professional understanding of, or practical, disciplinary, or vocational experience with consumer protection and policies and programs to support sustainable homeownership; and

(vi) 1 of whom shall have a demonstrated technical, academic, or professional understanding of, or practical, disciplinary, or vocational experience with affordable rental housing.”

Sec. 106. REPORTS; TESTIMONY; AUDITS.

The FMIC’s annual report to Congress should include a discussion of how the FMIC is accomplishing its purpose of ensuring accessibility to affordable mortgage credit for all reasonably qualified borrowers, especially low- and moderate-income borrowers and borrowers from traditionally hard-to-serve or underserved markets (see comments on section 101, above).

p. 31, line 2: after “securities” insert “including the state and functioning of the TBA market and a detailed discussion of how it has provided these benefits across all income levels, races, ethnicities, genders, housing types, and geographical locations;”

p. 31, line 12: after “housing market,” insert “and access to mortgage credit by current homeowners, homebuyers, and owners of rental housing,”.

Section 201. DUTIES AND RESPONSIBILITIES OF THE FMIC.

The FMIC’s duties should include ensuring accessibility to affordable mortgage credit for all reasonably qualified borrowers, especially low- and moderate-income borrowers and borrowers from traditionally hard-to-serve or underserved markets (see comments on section 101, above).

p. 39, line 15: following the word “credit” insert “for all reasonably qualified borrowers, especially low- and moderate-income borrowers and borrowers from traditionally hard-to-serve and underserved markets”

p. 40, line 4: following the word “that” insert “all reasonably qualified borrowers, especially low- and moderate-income borrowers and borrowers from traditionally hard-to-serve and underserved markets, and”

Sec. 202. STANDARD FORM CREDIT RISK-SHARING MECHANISMS, PRODUCTS, STRUCTURES, CONTRACTS, OR OTHER SECURITY AGREEMENTS.

Allow the FMIC Flexibility to Establish Appropriate First-Loss Position Threshold

There should not be an arbitrary first-loss position requirement of 10 percent of the principal or face value of all covered securities. Instead, the FMIC should be given the flexibility to establish the required first-loss position according to the principles laid out in subsection 1, i.e. adequate to cover losses that might be incurred as a result of adverse economic conditions.

p. 42, lines 20-21: strike subsection (2) (renumber as needed).

Strengthen the Mandate of the Corporation

p. 43, line 22: strike “consider how” and replace with “ensure that”.

Consider Impact on Low- and Moderate-Income Borrowers and Borrowers from Traditionally Hard-to-Serve and Underserved Markets

When developing the standard form credit risk-sharing mechanisms, products, structures, contracts, or other security agreements, the FMIC should consider their impact on low-and moderate-income borrowers and borrowers from traditionally hard-to-serve and underserved markets.

p. 44, line 8: after the word “consumers” insert “, especially low- and moderate-income borrowers and borrowers from traditionally hard-to-serve and underserved markets”

p. 44, line 9: after the word “affordability” insert “, especially low- and moderate-income borrowers and borrowers from traditionally hard-to-serve and underserved markets”

Prioritize the Preservation of Homeownership

p. 44, line 11: after the word “modification” insert “that prioritize the preservation of homeownership, to the extent that doing so is consistent with the interests of investors”

Access to Housing Counseling

p. 44, line 15: insert new subsection (vii): “(vii) provides full access and opportunity for consumers to HUD-Approved Housing Counseling Agencies and

Sec. 205. AUTHORITY TO PROTECT TAXPAYERS IN UNUSUAL AND EXIGENT CIRCUMSTANCES.

Allowing the FMIC flexibility to establish the required first-loss position according to the principles laid out in section 402(a)(1), i.e. adequate to cover losses that might be incurred as a result of adverse economic conditions, would negate the need to allow the Fed chair and Treasury secretary to suspend the requirement that holders of covered securities take a first-loss position. This would also have the advantage of providing policymakers with a more flexible approach to confronting unusual and exigent circumstances, such as not limiting the response to such circumstances to six-months and limiting their use to once every three years.

p. 52, line 12-p. 53, line 10: strike section 105 in its entirety

Sec. 211. Approval of Private Mortgage Insurers

p. 59, line 11: insert a new subsection (D): “(D) a demonstrated commitment to insuring a broad range of mortgage risks, including those serving the full spectrum of geographies, housing types, and populations and those made to low- and moderate-income borrowers and to borrowers from traditionally hard-to-serve and underserved markets;” (renumber subsequent subsections as needed)

Sec. 212. APPROVAL OF SERVICERS.

Address Improper Servicing Practices and Encourage Preservation of Homeownership

The standards for approval of servicers that are eligible to administer eligible mortgages should include a prohibition on improper servicing practices, such as dual-tracking and a lack of adequate servicing for borrowers with limited English proficiency (LEP). Unfortunately, these improper servicing practices are widespread.³

p. 63, line 8: insert new subsection (E): “(E) the record of consumer complaints lodged against the servicer with the Bureau of Consumer Financial Protection;” and renumber subsequent subsections as needed

p. 63, line 13: after the word “title” insert: “and that prioritize the preservation of homeownership, to the extent that doing so is consistent with the interests of investors, including through affordable loan modifications.”

p. 63, line 14: insert new subsection (F), “(F) the establishment of procedures for the servicer to refrain from initiating a judicial or non-judicial foreclosure, or where a foreclosure has been initiated, from taking any additional steps in the judicial or non-judicial foreclosure, once an initial request for loss mitigation has been made by the homeowner, until completion of the review of any loss mitigation application, including written notice to the homeowner documenting any denial and a requisite appeal process;” and renumber subsequent subsections as needed

p. 63, line 14: insert new subsection (G): “(G) the establishment of procedures requiring servicers to provide loss mitigation services in the full range of languages in which the mortgages being serviced were marketed to borrowers, including accepting written loss mitigation applications and other written

³ See, e.g., National Housing Resource Center, *National Mortgage Settlement Servicing Standards and Noncompliance: Results of a National Housing Counselor Survey*, June 5, 2013 (available online at http://www.hsgcenter.org/wp-content/uploads/2013/06/NMS_Findings.pdf).

materials in those languages, providing written communications in those languages, and ensuring that borrowers are reasonably able to communicate orally with the servicer in those languages, including ensuring that any translators used to communicate orally with borrowers understand the loss mitigation process and are able to accurately translate the technical terms used in the loss mitigation process;”

p. 64, line 9: insert new subsection (C): “(C) a demonstrated capability and commitment to servicing loans accurately and returning the greatest value to the investor, including performing loss mitigation when necessary;” and renumber subsequent subsections as needed

Servicer Engagement with Housing Counseling Agencies

p. 64, line 9: insert new subsection (E): “(E) A requirement that the servicer establish working relationships with HUD-approved housing counseling agencies, including but not limited to acceptance of loss mitigation packages, escalation lines, and funding for services delivered;” and renumber subsequent subsections as needed

Sec. 213. APPROVAL OF ISSUERS.

p. 69, line 13: insert new subsection (D): “(D) a demonstrated capability and commitment to serve a broad range of communities and borrowers, including low- and moderate-income borrowers and borrowers from traditionally hard-to-serve and underserved markets;” and renumber subsequent sections as needed

Sec. 214. APPROVAL OF BOND GUARANTORS.

p. 78, line 4: insert new subsection (D): “(D) a demonstrated capability and commitment to serve a broad range of communities and borrowers, including low- and moderate-income borrowers and borrowers from traditionally hard-to-serve and underserved markets;” and renumber subsequent sections as needed

Sec. 215. AUTHORITY TO ESTABLISH FMIC MUTUAL SECURITY COMPANY.

Member Participant Standards

p. 85, line 22: after the word “members” insert “and engagement with HUD-approved housing counseling agencies”

Sec. 216. ADDITIONAL AUTHORITY RELATING TO OVERSIGHT OF MARKET PARTICIPANTS.

p. 88, lines 23-24: change subsection (3) to provide: “(3) liquidity and transparency in the secondary mortgage market; and”

p. 88, line 24: insert new subsection (4): “access to mortgage credit, especially for low- and moderate-income borrowers and borrowers in traditionally hard-to-serve and underserved markets.”

Sec. 217. CIVIL MONEY PENALTIES.

Use civil money penalties to affordable housing allocations.

The FMIC should price premiums so as to ensure the MIF is adequately capitalized. If it does so, there is no need for civil money penalties to be deposited into the MIF. Instead, civil money penalties should be used for section 402 affordable housing allocations.

p. 91, lines 17-18: after the word “the” strike “Mortgage Insurance Fund established under section 203” and insert “the affordable housing allocations under section 402”

Sec. 223. Uniform Securitization Agreements.

All loss mitigation options available to all borrowers

p. 96, line 12: insert new subsection (2): “(2) loss mitigation, including the development of uniform standards and practices

(A) requiring servicers to make all loss mitigation options available to all borrowers and to offer homeowners affordable loan modifications that prioritize homeownership to the greatest extent possible consistent with the interests of the investors;

(B) requiring servicers to refrain from initiating a judicial or non-judicial foreclosure, or where a foreclosure has been initiated, from taking any additional steps in the judicial or non-judicial foreclosure, once an initial request for loss mitigation has been made by the homeowner, until completion of the review of any loss mitigation application, including written notice to the homeowner documenting any denial and a requisite appeal process.”

Sec. 224. Uniform Mortgage Database

Include Demographic and Geographic Data and Data on Housing Counseling in Uniform Mortgage Database

p. 97, line 15: after the word “information” insert “including demographic and geographic data”

p. 98, line 1: insert new subsection (7): “(7) whether the borrower received housing counseling from a HUD-approved housing counseling agency and, if so, the agency that provided the counseling, and the type of counseling provided;” and renumber subsequent subsections as needed

Sec. 231. OFFICE OF UNDERWRITING.

p. 100, line 18: after the word “mortgages” insert “, including through the use of HUD-Approved Housing Counseling Agencies”

Sec. 232. OFFICE OF SECURITIZATION.

Securities other than covered securities that are offered through the securitization platform should also be subject to uniform securitization agreements. While the agreements may vary depending on whether or not the pool is insured, they should still be uniform.

p. 102, line 14: change “may” to “shall”

New Sec. 233. Office of Community Investment and Office of Ombudsman

p. 103, line 14. Insert new section 233 and renumber subsequent sections as needed:

“Sec. 233. OFFICE OF COMMUNITY INVESTMENT.

(a) ESTABLISHMENT: There is established within the FMIC an Office of Community Investment, which shall be headed by the Deputy Director of Community Investment, who shall be appointed by the Director of the FMIC.

(b) RESPONSIBILITIES: The Office of Community Investment shall ensure that the activities of the FMIC comply with the requirements of this Act with respect to ensuring the broad availability of sustainable mortgage credit to all geographies, housing types, mortgage balances and populations in a safe and sound manner. Specifically, the Office of Community Investment shall –

(1) ADMINISTER THE MARKET ACCESS FUND -- pursuant to the guidelines set out in section [XX], [etc.]

(2) PERFORM ANNUAL MARKET ANALYSIS – as part of the FMIC annual reporting process described in section [XX], the Office of Community Investment shall –

(A) Conduct an overall market assessment, including a needs analysis to identify priority and unmet needs in the housing finance market, identify areas that have been underserved by the market as a whole, assess the potential causes of these gaps and evaluate barriers to and opportunities for addressing those gaps.

(B) Examine the characteristics of all securities insured by the FMIC. This examination shall assess and compare the distribution and the terms of mortgage loans contained in the securities insured by FMIC during the previous year with respect to income and racial characteristics of borrowers or rental affordability, income and racial characteristics of census tracts, loan amounts, rural areas, lender size and type, affordable multifamily units, identified priority and unmet and underserved segments, and by risk characteristics of borrowers, across segments within FMIC securities and compared with the overall market as reported in HMDA for the previous 3 years for which data is available.

(3) EVALUATE ISSUER AND BOND GUARANTOR PERFORMANCE – The Office of Community Investment will establish and implement a process for evaluating whether, and the extent to which, certain issuers and Bond Guarantors have performed with respect to the provision of broad availability of sustainable mortgage credit to all geographies, housing types, lender sizes, mortgage balances within the relevant loan limits, and populations. Such an evaluation will –

(A) apply to any issuer or bond guarantor that, in the previous year, was responsible for 5 percent or more of all securities insured by the FMIC, and any other issuers or Bond Guarantors on a discretionary basis, and shall take into consideration –

(1) The characteristics of loans in all securities insured by the FMIC for which that issuer or Bond Guarantor was responsible in the previous year, taking into account the factors considered in the Market Analysis and the safety and soundness of all such loans;

(2) The extent of measures taken to assist borrowers to succeed as homeowners, including measures taken to assist borrowers experiencing financial or other distress;

(3) The effective use of Market Access Fund resources;

(4) Compliance with antidiscrimination and consumer protection laws; and

(5) Any other parameters that the Office of Community Investment believes are necessary to a complete and accurate evaluation.

(B) Provide for the submission by each such issuer or guarantor of a strategic plan for addressing unmet needs or underserved markets identified in the market analysis or other weaknesses identified in the evaluation.

(C) Establish a procedure for rating level of performance and applying incentives and penalties corresponding to levels of performance, except that the Office of Community Investment shall not evaluate the issuers or bond guarantors based solely on the volume of loans falling into particular categories.”

Sec. 234. OFFICE OF THE OMBUDSMAN.

p. 104, line 8:insert new section 234:

“Sec.234. OFFICE OF THE OMBUDSMAN.

The Corporation shall establish an Office of the Ombudsman to receive complaints from homeowners, homeowners’ representatives and other designated third parties concerning their mortgage originator or servicer. The Ombudsman shall have the authority to investigate, including but not limited to the right to obtain information, documents, and records, in whatever form kept, from the servicer, and to resolve disputes between any homeowner and the servicer of a loan insured by the Corporation.”

Sec. 401. AFFORDABLE HOUSING ALLOCATIONS.

p. 123, line 15: strike everything after the word “to” and insert “10 basis points for each dollar of the outstanding principal balance of eligible mortgages collateralizing securities manufactured through the platform or otherwise backed by the full faith and credit of the United States government, which fee shall be collected in a manner similar to the guarantee fee and paid into the fund on an annual basis; and”

Sec. 402. HOUSING TRUST FUND and Sec. 404. ADDITIONAL TAXPAYER PROTECTIONS.

Included under the subsection heading “NOT TO BE USED FOR POLITICAL ACTIVITIES” in section 404(b)(5) is a prohibition on the use of Housing Trust Fund grants for “personal counseling services.” The meaning of “personal counseling services” in the broader context of a prohibition on using grant funds for political activities is ambiguous and should be clarified or removed.

Including “personal counseling services” as a prohibited use is especially problematic because it could be read as prohibiting Housing Trust Fund grants from being used for housing counseling, a result that is clearly contrary to Congress’ intent in creating the Housing Trust Fund. The language in section 404(b) largely parallels, and is explicitly intended to be consistent with, section 1338(c)(10) of the Housing and

Economic Recovery Act of 2008 (HERA), which includes a list of prohibited uses that is very similar to that in section 404(b) of Corker-Warner. Elsewhere in section 1338, though, it is clear that housing counseling is intended to be an eligible use. Under section 1338(b)(10)(D)(iii), for example, “The Secretary [of Housing and Urban Development] shall, by regulation limit the amount of any grant amounts for a year that may be used ... for administrative costs of carrying out the program required under this subsection, including home ownership counseling, to a percentage of such grant amounts” Since it would be contradictory to both prohibit housing counseling as an eligible use and instruct the Secretary of HUD to limit the amount of grants that can be used for housing counseling, the ambiguous prohibition on “counseling services” is clearly not meant to prohibit the use of grant funds for housing counseling.

While it is clear from the context of section 1338 of HERA that housing counseling is an eligible use for Housing Trust Fund grants, this should be made explicit in section 1338(c)(7), which is amended in section 402 of Corker-Warner, and the ambiguous language in section 404(b)(5) should be struck or clarified.

p. 126, line 15: insert new subsection (E): “(E) Housing counseling provided by HUD-approved housing counseling agencies.

p. 130, line 4: strike (or clarify) “personal counseling services”

New Sec. 403. Market Access Fund.

p. 124, line 15: insert new section 403 and renumber subsequent sections as needed:

“Sec. 403. Market Access Fund.

(a) ESTABLISHMENT.—There is established in the FMIC a Fund, to be known as the ‘Market Access Fund’, which shall be maintained and administered by the FMIC Office of Community Investment.

“(b) DEPOSITS.—The Market Access Fund shall be credited with—

“(A) the share of the fee charged and collected by the FMIC pursuant to subsection [XX] and

“(B) any other such amounts as may be appropriated or transferred to the Fund.

“(c) PURPOSE.—Amounts in the Market Access Fund shall be available to the FMIC to address the homeownership or rental housing needs of low-to-moderate income and underserved or hard-to-serve populations by—

“(A) providing grants and loans for research, development and pilot testing of innovations in consumer education, product design, underwriting and servicing ;

“(B) offering additional credit support for certain mortgages or pools of mortgages, such as covering a portion of the capital required for FMIC guarantee eligibility.

“(d) EVALUATION. -- The Director of the FMIC shall provide, as part of the annual report to Congress, a full accounting of the performance and outcomes of grants, loans, or credit support programs funded by the Market Access Fund, including an evaluation of how each grant, loan, or program authorized under subparagraphs (A) and (B) succeeded in or failed to—

‘(I) meet the needs of certain populations, especially low-to-moderate income and underserved or hard to serve populations; and

“(II) maximize the leverage of the public investment being made under each such subparagraph.”

Sec. 506. REPEAL OF AFFORDABLE HOUSING GOALS.

p. 147, line 19-p. 149, line 10: strike this section in its entirety

Sec. 603. GAO REPORT ON FULL PRIVATIZATION OF SECONDARY MORTGAGE MARKET.

p. 152, line 1-p. 153, line 3: strike this section in its entirety

Please feel free to contact Bruce Dorpalen, at bdopalen@hsgcenter.org, or 215 675-0048 if the Committee has questions or would like more information.