JOINT CENTER FOR HOUSING STUDIES

Graduate School of Design • John F. Kennedy School of Government • Harvard University

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Tel (617) 495-7908 Fax (617) 496-9957 www.jchs.harvard.edu

May 5, 2011

HUD Desk Officer
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

To Whom It May Concern:

This letter is to confirm the Joint Center's support for HUD's proposed 2012 Rental Housing Finance Survey (RHFS), OMB Approval Number 2528-Pending. Our support of the survey is due to a number of factors.

After careful review of the RHFS questionnaire, the Joint Center believes this new survey would be a valuable resource for obtaining important, and otherwise unavailable, data for our research on the current state and ongoing challenges of the nation's multifamily rental housing market.

Of specific interest to our research is the collection of detailed data on type of owner, use of subsidies, proposed size and composition of remodeling and repair spending, and of course financing of rental properties. Since this type of data is either very dated (the last Residential Finance Survey was conducted in 2001) or currently unavailable from any other sources, the RHFS would be of great benefit to our research activities.

In particular, with the discontinuation of the Census Bureau's Survey of Residential Alterations and Repairs (SORAR) in 2007, the residential remodeling industry lost its only measure of the size and composition of improvement and repair expenditures to renter-occupied units. Currently there exist no other public or private sources of rental remodeling data with the same frequency and detail as was available with the SORAR, and until Census or another agency is able to once again survey owners of rental units about their remodeling activity, the industry is left having to crudely estimate a significant segment of total market size.

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Please contact me if the Joint Center can be of further help regarding this matter.

Sincerely,

Eric S. Belsky

Managing Director

Joint Center for Housing Studies

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