



**REGULATORY AND HOUSING POLICY**

**DAVID A. CROWE**  
SENIOR STAFF VICE PRESIDENT

December 17, 2007

Office of Information and Regulatory Affairs  
Office of Management and Budget  
Attention: Desk Officer for the Federal Housing Finance Board  
Washington, DC 20503

Reference: No. 2007-N-13

Dear Sir or Madam:

On behalf of the 235,000 members of the National Association of Home Builders (NAHB), I welcome the opportunity to respond to the Federal Housing Finance Board's request for comments on forms used to collect information for Federal Home Loan Bank appointive director applications and Federal Home Loan Bank director eligibility certifications. NAHB is a national trade association representing individuals and companies involved in the production of housing and related activities. Each year, NAHB's members construct about 80 percent of all new housing in America.

A number of NAHB's members serve, or have served, as appointed directors on the boards of Federal Home Loan Banks. That experience has provided them first hand knowledge of the forms under consideration and they have shared their opinions on these forms with NAHB. In general, our members feel that the information requested on the forms is reasonable and necessary. NAHB supports the emphasis in the director's application form on information related to the housing and community development mission of the Federal Home Loan Banks. The collection of such information is highly relevant since the appointed public interest directors are expected to provide mission perspective to board deliberations.

The one change NAHB's members have said should be made to both forms is to provide the documents online in an electronic, interactive format. Currently, both the application and eligibility forms have to be converted to a word processing format, such as Microsoft Word, in order for applicants to fill them out electronically, or filled out manually and then scanned into electronic form. The availability of an online, interactive

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electronic form would reduce the time required to complete and return these forms and improve the uniformity and consistency of the results.

Thank you again for the opportunity to offer NAHB's input on these important information forms. Please contact Dave Ledford, NAHB's Staff Vice President for Housing Finance and Housing Policy, at 202-266-8265, if there are any questions regarding NAHB's comments.

Respectfully,



David A. Crowe  
Senior Staff Vice President  
Regulatory and Housing Policy

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