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Sent: Friday, October 31, 2014 3:08 PM
To: Ken Reecy; Steve Auger
Cc: Liz Wong
Subject: 2014 RFA comments

Below please find comments that are applicable to a number of 2014 RFAs:

- 1) FHFC should establish **TDC caps and leveraging based on the number of bedrooms**, not based on the number of units. As the system currently stands, the effect of FHFC's policy is to encourage 1 BR units; incentivizing a greater variety of unit types would better serve a needy population over the long term.
- 2) Make the Withdrawal Disincentive meaningful by drilling down to the "live people" behind the application, by **requiring applicants to certify a list of all Principals** so that it is clear who the Financial Beneficiaries are for a given application. Otherwise some of the Financial Beneficiaries -- that aren't required to reveal themselves under the FHFC's current List of Principals template -- could theoretically skirt the Withdrawal Disincentive rule altogether.

Thank you,

Ken

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