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June 8, 2017

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Submitted via web: <https://www.regulations.gov/document?D=USDA-2017-0001-0001>

RE: Requests for Information: Improving Customer Service

Dear Secretary Purdue:

On behalf of the more than 1.2 million members of the National Association of REALTORS® (NAR), I thank you for the opportunity to comment on the proposed elimination of the U.S. Department of Agriculture (USDA) Under Secretary for Rural Development. NAR strongly supports the agencies of USDA Rural Development, especially the Rural Housing Service (RHS). Eliminating the Under Secretary for Rural Development would limit the ability and effectiveness of the Rural Development agencies, like RHS, to serve the housing and community needs of rural America.

The National Association of REALTORS® is America's largest trade association, representing over 1.2 million members, including NAR's institutes, societies, and councils, involved in all aspects of the residential and commercial real estate industries. NAR's membership is composed of residential and commercial REALTORS® who are brokers, salespeople, property managers, appraisers, counselors, and others engaged in the real estate industry. Members belong to one or more of approximately 1,200 local associations/boards and 54 state and territory associations of REALTORS®.

NAR is concerned with the changes proposed in the USDA Report to Congress entitled: "Proposed 2017 Reorganization of the Department of Agriculture to Establish an Under Secretary for Trade and Foreign Agriculture Affairs". This proposal would eliminate the Under Secretary for Rural Development; a move REALTORS® believe would hinder the ability of RHS to help provide safe, stable housing for rural families.

RHS provides critical housing opportunities for the 20 percent of the U.S. population that live in rural areas and small towns. Finding safe and affordable housing is difficult in rural communities where rental housing is often limited and access to mortgage financing can be challenging. Housing choices can be limited due to differences in infrastructure requirements, lack of public transit, and access to other amenities. For many Rural Americans, programs like the Section 502 Rural Housing Loan Programs are the only option for purchasing or improving a home, as other forms of financing can be difficult to access in rural communities. Section 502 loans can be used to build, repair, renovate or relocate a home, or to purchase and prepare sites, including providing water and sewage facilities.

RHS also provides rental assistance for millions of America's rural families. Without this program, many multifamily properties would never be located in these rural areas. In FY 15 alone, RHS financed or guaranteed the construction and revitalization of over 10,840



units of multifamily housing and supported 249,000 rural families with limited means to pay rent by providing rental assistance and vouchers.

The housing needs of rural America deserves equal footing with all of USDA's program missions, including adequate staffing and resources. The Under Secretary of Rural Development and their office ensures that Rural Development programs have a unified voice advocating for the communities and families that RHS and the other Rural Development agencies serve, while allowing programmatic staff to attend to the day to day needs of rural communities. Creating an Under Secretary of Trade does not obligate USDA to eliminate an Under Secretary or downgrade any other mission area. NAR urges you to retain the Under Secretary for Rural Development position, as well as the critical mission of these valuable RHS programs.

NAR appreciates the opportunity to comment on this matter. If you have any questions regarding this letter, please contact me or NAR's Regulatory Policy Representative, Sehar Siddiqi, at 202-383-1176 or SSiddiqi@REALTORS.org

Sincerely,

A handwritten signature in cursive script that reads "William E. Brown". The signature is written in black ink on a light-colored background.

William E. Brown

2017 President, National Association of REALTORS®