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September 7, 2010

VIA E-MAIL – [regcomments@fhfa.gov](mailto:regcomments@fhfa.gov)

Mr. Edward J. DeMarco  
Acting Director  
Federal Housing Finance Agency  
1700 G Street N.W.  
Washington, D.C. 20552-0003

Mr. Alfred Pollard  
General Counsel  
Attn: Comments/RIN 2590-AA23  
Federal Housing Finance Agency  
1700 G Street N.W.  
Washington, D.C. 20552-0003

Re: Comments on Proposed Regulations 2590-AA23

Dear Mr. DeMarco and Mr. Pollard:

This firm represents approximately 25 multiemployer defined benefit pension plans in the Pacific Northwest. We received information on September 3, 2010 from the National Coordination Committee for Multiemployer Plans about Proposed Regulation RIN 2590-AA23.

On behalf of my clients, I have reviewed the regulations, the comments from the National Coordinating Committee for Multiemployer Plans and the lead counsel in the Fannie Mae Securities Litigation. Given the short time period, I would limit my comments to noting that my clients have the same concerns about the proposed regulations as the above commentators and the fact that they would negatively impact the ability of pension plans and other entities to recover from Fannie Mae and Fannie Mac for their alleged wrongdoing. I would request that the Agency modify the regulations as requested by the commentators representing the multiemployer plan community.

Sincerely,



David S. Barlow  
Attorney at Law

DSB:mp