

August 5, 2005

U.S. Dept. of HUD
Attn: 4350.3 REV-1 Change 2 Comments
Room 6134
451 7th St., SW
Washington, DC 20410

RE: *Federal Register* Notice FR-4770-N-02

To Whom It May Concern:

The undersigned national housing industry associations are submitting the following comments for your consideration as you finalize Change 2 to the 4350.3 Handbook. The organizations listed below represent members who are involved in providing or administering federally assisted rental housing and as such are very familiar with HUD's occupancy requirements.

We appreciate the opportunity to comment on the changes being proposed and would like to commend the drafters for their diligence and acuity in addressing much needed modifications to the existing occupancy handbook. The draft changes are, by and large, well written and will be helpful for assisted housing providers and administrators in complying with and carrying out HUD's program requirements.

As a number of the changes will require on-site managers to revise tenant rent calculations and otherwise amend their current processes, we urge the Department to allow a minimum of 120 days lead time before requiring implementation of the program changes. This lead time is also critical for TRACS vendors to update their software to reflect the Handbook changes

The attached comments do not include suggestions regarding specific issues related to software development as we believe the individual vendors are best suited to raise such concerns and/or questions, although we recognize that a number of software changes will be required.

Thank you again for the ability to comment on Change 2 to the 4350.3. We stand ready to work with HUD on implementing these changes and are happy to answer any questions with regard to our comments. Please contact Denise B. Muha at the National Leased Housing Association with any questions (202/785-8888).

Sincerely,

American Association of Homes and Services for the Aging
Council for Affordable and Rural Housing
Institute of Real Estate Management
National Affordable Housing Management Association
National Association of Homebuilders
National Association of Realtors
National Leased Housing Association