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Reference: Comments made on Proposed Rulemaking of New Market Tax Credits (NMTC).

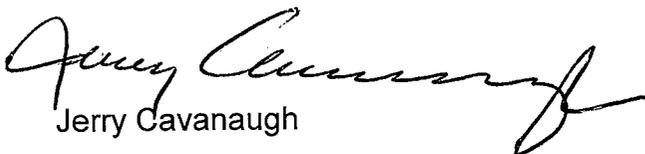
I know the purpose of this letter is offer comments on CDFI Bond Guarantee Program but, I want to offer a general comment on the CDFI Program. I don't believe the CDFI program makes it as simple as participating in the program.

I think people have made the CDFI program much more complicated than it needs to be especially for the business owner. Maybe it's just me but I think the business owners don't take away financial knowledge from the CDFI program that makes sense to the business. It's probably just me, but I listen to consultants and those organizations that have NMTC available for a project, who seem to make this a program more difficult than it needs to be. Projects change and sometimes I don't know what our total debt will be out of using the CDFI program.

As a business owner, I used to spent time with the US Small Business Administration (SBA) and Bureau of Indian Affairs (BIA) and even the US Department of Agriculture (USDA) with the program guidelines and programs related to a business. I knew the guidelines for each program and, of course, the amount of the loan I was pursuing.

It seems that any discussion on using NMTC by an organization that has NMTC available is complicated, much more so then the SBA, BIA and USDA loan programs. I know that the CDFI program has an investor who will buy the NMTC but we seem to be spending a lot of time making sure the investor is comfortable with the CDFI program. I know, we need to make the investor comfortable with the project but that is the only difference between loan programs offered by SBA, BIA and USDA.

Respectfully,

  
Jerry Cavanaugh