

**COMMUNITY DEVELOPMENT FUNDING, LLC**

May 29, 2007

NMTC Program Manager  
CDFI Fund, U.S. Department of the Treasury  
601 13th Street, NW, Suite 200 South  
Washington, DC 20005

Re: Rural QLICI Request for Comments

Dear Program Manager:

By way of introduction, Community Development Funding, LLC is a first and second round NMTC allocatee, having received \$80 million in allocations, \$77 million of which has been deployed. The following represents our input related to the question of how the Community Development Financial Institutions (CDFI) Fund should ensure that non-metropolitan counties receive a proportional allocation of Qualified Equity Investments.

In reference to item 1(d), the CDFI Fund should ensure that a desired proportion of QLICIs are provided in non metropolitan area without consideration of where the CDE is headquartered or which counties it is principally serving.

In reference to item 2(a), the CDFI Fund should define the word "proportional" to mean the proportion of low-income communities that are located in non-metropolitan areas.

In reference to item 2(c), the percentage of QLICIs made in low-income communities should be based on the total dollar amount of QLICIs made.

In reference to item 3(a), the CDFI Fund should award priority points based on both track record and the forward looking commitment.

In reference to 3(b), the CDFI Fund should not advance lower scoring applicants because they serve non-metropolitan areas.

In reference to item 4, the CDFI Fund should require that applicants specify in their application the percentage of their QEI proceeds that they will use to make investments in non-metropolitan areas and be held to those percentages as a condition of their allocation agreement.

Thank you for this opportunity to comment on this issue.

Best regards,

  
Craig Stanley, President

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# Fax

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Re: Rural AETS - Public Comment cc: \_\_\_\_\_

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