



National Council of  
State Housing Agencies

December 28, 2018

CC:PA:LPD:PR (REG-115420-18)  
Room 5203, Internal Revenue Service  
P.O. Box 7604, Ben Franklin Station  
Washington, DC 20044

Re: 26 CFR Part I, REG-115420-18, Investing in Qualified Opportunity Funds

Dear Sir or Madam,

On behalf of the nation's Housing Finance Agencies (HFAs), the National Council of State Housing Agencies (NCSHA) requests the opportunity to appear at the January 10 IRS public hearing on the abovementioned ruling. Our comments will address the following issues:

1. Original Use of Opportunity Zone Property
2. Substantial Improvement of Opportunity Zone Property
3. Qualified Opportunity Zone Business Requirements
4. Self-Certification of A Qualified Opportunity Fund
5. Preventing The Loss of Affordable Housing in Opportunity Zones
6. Specifying Reporting Requirements for Opportunity Zone Investments

Sincerely,

Stockton Williams  
Executive Director