



"Ensuring equal access to housing for all people"

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January 14, 2011

Regulations Counsel

Office of General Counsel

U.S. Department of Housing and Urban Development

451 Seventh Street SW, Room 10276

Washington D.C. 20410

Re: Docket No. FR-5508-P-01

Implementation of the Fair Housing Act's

Discriminatory Effect Standard

Submitted through Federal eRulemaking Portal at

www.regulations.gov

To Whom It May Concern:

Housing Opportunities Made Equal of Virginia, Inc. ("HOME") supports the Department's efforts to establish standards for determining when a housing practice with a discriminatory effect violates the Fair Housing Act. The Department has requested comments on the issue of which party bears the burden of proof to establish a less discriminatory alternative. We respectfully suggest that the burden of proof be assigned to the defendant or respondent to show that there is no less discriminatory alternative.

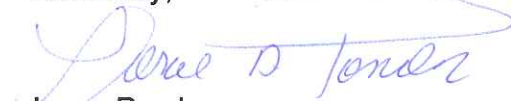
HOME was founded in 1971 to fight housing discrimination in Virginia. HOME vigorously pursues its mission of ensuring equal access to housing for all people through counseling and education, fair housing enforcement and leadership in public policy. We are in full support of the National Fair Housing Alliance's comment letter.

Thank you for the opportunity to comment on the proposed regulation implementing the Fair Housing Act's discriminatory effect standard. We again commend the Department for promulgating the proposed regulations implementing the discriminatory effect standard under the

Housing Opportunities Made Equal of Virginia, Inc.
Comments to Proposed Discriminatory Effect Regulations
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Fair Housing Act. Please feel free to contact me at 804-354-0641 with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lorae D. Ponder", with a large, sweeping loop at the end.

Lorae Ponder
Acting President & CEO