§ 657. Tax exemption of corporation. 1. The property, income, obligations and activities of the corporation shall be exempt from all taxes and assessments.

2. The state of New York does hereby pledge to and agree with the holders of the bonds, notes, or other obligations of the corporation pursuant to this article, or of the state of New York mortgage agency authorized in section two thousand four hundred six of the public authorities law for the corporate purposes authorized in section two thousand four hundred five-a of the public authorities law, or of any other state entity authorized to issue bonds or notes under the New York education loan program codified in part V of this article that are issued for such purpose, and with the holders of such education loans, that the provisions of law applicable to the New York education loan program variable rate default reserve fund, the New York education loan program fixed rate default reserve fund, or the state of New York mortgage agency New York education loan program default reserve fund, as applicable, and to the powers of the corporation to receive and deposit in each such fund the applicable amounts described therein shall not be amended in a manner adversely affecting the interests of such holders without adequate provision being made to protect such interests and that the corporation shall not be required to pay any taxes or assessments upon any of its property or upon its activities pursuant to the provisions of this article, or upon any moneys, funds, revenues or other income held or received by the corporation, and that the obligations and notes of the corporation and the income therefrom shall at all times be exempt from taxation, except for estate and gift taxes and taxes on transfers. Each of the corporation, the state of New York mortgage agency and any such other public benefit corporation, is authorized to include this pledge and agreement of the state in any agreements with the holders of such bonds and with the holders of such education loans.