



August 20, 2010

Jennifer J. Johnson
Secretary
Board of Governors of the
Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket No. OP-1388

Dear Ms. Johnson,

The Conference of State Bank Supervisors (CSBS) and the American Association of Residential Mortgage Regulators (AARMR) appreciate the opportunity to comment on the Federal Reserve Board's (FRB) request for comment regarding potential revisions to Regulation C, which implements the Home Mortgage Disclosure Act (HMDA). HMDA data has been an important tool for regulators since the law was enacted in 1975. However, there are certainly ways to make the information that is collected more robust.

CSBS and AARMR urge the FRB to require that HMDA reporters include in the HMDA data submitted the mortgage loan originator's and mortgage company's unique identifier. The assignment of the unique identifier is governed by the Nationwide Mortgage Licensing System (NMLS) as required by the Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act).

The states, through CSBS and AARMR developed and launched NMLS to enhance supervision of the residential mortgage market. The unique identifiers granted to residential mortgage loan originators and companies through NMLS allow supervisors to track mortgage providers across state lines to ensure a provider will not escape regulatory action in one state simply by crossing into another state. The unique identifier also allows both consumers and regulators to easily track specific originators' and companies' histories and qualifications through the NMLS and NMLS Consumer Access. Coupled with the SAFE Act, NMLS enables state and federal regulators to better coordinate our efforts to create a seamless system of mortgage supervision.

The benefit of the unique identifier has been recognized in a similar capacity by the Federal Housing Finance Agency (FHFA), which is requiring Fannie Mae and Freddie Mac to obtain loan-level identifiers for each loan originator, loan origination company, field appraiser, and supervisory appraiser.

Additionally, the recent Dodd-Frank Bill, signed into law by President Obama, recognizes the importance of the unique identifier by mandating that the Securities and Exchange Commission

“require issuers of asset-backed securities, at a minimum, to disclose asset-level or loan-level data, if such data are necessary for investors to independently perform due diligence, including data having unique identifiers relating to loan brokers or originators.”

CSBS and AARMR therefore urge FRB to require loan originators’ and mortgage companies’ unique identification numbers as a HMDA data field.

We appreciate the opportunity to comment and look forward to working with the FRB on HMDA related matters.

Neil Milner

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President and CEO, CSBS

Darin Domingue

A handwritten signature in black ink that reads "Darin Domingue". The signature is written in a cursive style with a large initial "D" and "D".

President, AARMR