

June 27, 2017

Office of Housing and Regulatory Policy  
Federal Housing Finance Agency  
400 7<sup>th</sup> Street, SW, 9<sup>th</sup> Floor  
Washington, D.C. 20219

**Re: Improving Language Access in Mortgage Lending and Servicing**

Director Watt,

The undersigned trade associations representing the Nation's financial services industry appreciate the opportunity to respond to the Federal Housing Finance Agency (FHFA) Request for Input (RFI) on Improving Language Access in Mortgage Lending and Servicing. Developing ways to better serve Limited English Proficiency (LEP) borrowers with safe and affordable credit is an important issue for our members. Nevertheless, for the reasons provided below, we formally request an extension of the comment period currently set at 45 days to at least 90 days.

Based on the collective experiences of our members, who engage in all facets of the mortgage process, we agree that more efficiently addressing the challenges of LEP borrowers is critical to both these borrowers and the mortgage market itself. The importance of this issue is expected to grow over time, as LEP borrowers continue to increase as a share of the overall population of borrowers in the years ahead.

The RFI reflects the breadth and difficulties of this issue, as it asks for extensive information on current resources and poses numerous, detailed questions. Considering, however, the need for broad and diverse participation by lenders of all sizes and business models; thoughtful consideration of the manifold resources and approaches today; identification of legal and other concerns; and the multi-year effort that FHFA admits will be needed to better serve LEP borrowers, there is ample justification for an extension of this RFI's comment period of at least 45 days. In addition, this input is sought during a time of unusually high volume of open comment periods with similar deadlines, including that of the Underserved Markets Plans under FHFA's Duty to Serve program.

The undersigned are committed to working with FHFA and other stakeholders on improving methods for identifying and alleviating challenges faced by LEP borrowers. The time currently allotted, however, is simply insufficient to thoughtfully respond to issues of this magnitude.

We thank you for your consideration of this request.

Sincerely,

**American Bankers Association  
Consumer Bankers Association  
Consumer Mortgage Coalition  
Credit Union National Association  
Housing Policy Council of the Financial Services Roundtable  
Independent Community Bankers of America  
Mortgage Bankers Association  
National Association of Federally-Insured Credit Unions**