

February 2, 2018

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

Re: Request for Input on Fannie Mae and Freddie Mac Credit Score Requirements

Eastern Corporate Federal Credit Union (EasCorp) is a federally-chartered corporate credit union headquartered in Burlington Massachusetts. EasCorp has approximately 250 natural person, member credit unions throughout the United States, many of whom are active mortgage lenders in their respective communities, and seller/servicers to and for each of Fannie Mae and Freddie Mac (the GSEs).

On their behalf, thank you for the opportunity to respond to the Federal Housing Finance Agency's (FHFA) Credit Score Request for Input.

Although there is no law or regulation that dictates what credit score a lender must use when originating mortgages that they wish to sell to the GSEs, neither Fannie Mae nor Freddie Mac currently allows delivery of loans with a credit score other than Classic FICO, as described in their Selling Guides. We think that this is an unfortunate circumstance given the fact that the model was built upon data which is seriously outdated. There are indeed newer scoring models that are more inclusive than Classic FICO and could be used optionally by the GSEs or as required by FHFA in its capacity as their regulator in order to preclude otherwise creditworthy borrowers from being denied access to mortgage loans.

Rather than maintaining the status quo, we support a policy of healthy competition among the providers of empirically-derived, and demonstrably and statistically sound credit scoring models. Alternative models almost certainly could help underserved portions of the U.S. population gain access to and receive more affordable rates on a home mortgage loan.

In conclusion, we want lenders to have credit scoring model options available to them consistent with a policy across the GSEs and their regulator that is strongly pro-consumer.

Thank you once again for the opportunity to provide input.

Sincerely,

  
Janie C. Melchionda  
President/CEO