

July 13, 2015

The Honorable Tim Scott
United States Senator
520 Hart Senate Office Building
Washington, DC 20510

The Honorable Joe Donnelly
United States Senator
720 Hart Senate Office Building
Washington, DC 20510

Dear Senators Scott and Donnelly:

The undersigned organizations thank you for introducing S. 1711, a bipartisan companion bill to H.R. 2213, which will provide a reasonable hold-harmless period through the end of the year following the October 3 effective date of the Consumer Financial Protection Bureau's TILA-RESPA Integrated Disclosures (TRID) regulation.

We share the Bureau's goal that these new disclosures help consumers better understand their terms when they buy a home or refinance their mortgage. Stakeholders are rewriting business processes, upgrading software and training staff to comply with the 1,888-page regulation. Unfortunately, stakeholders are not able to test the processes used to develop these new disclosures in real-life transactions before the implementation date. And, covered loans originated prior to October 3rd will need to follow the old rules and forms through loan closing, which creates an environment ripe for human errors. We know from implementing past regulations that unforeseen issues will arise in actual transactions. Therefore, a formal hold-harmless period through December 31 will allow stakeholders to make a good-faith effort to comply with the TRID regulation without the fear of potential enforcement actions or lawsuits.

A hold-harmless period allows the Bureau to work with industry to gather data about implementation and provide written guidance to address common industry implementation hurdles that emerge between now and the end of the year. Without more clarity, the result is likely to leave homebuyers with less flexibility to buy and close on a home on their terms and potentially fewer companies to work with.

Sincerely,

American Bankers Association
American Escrow Association
American Land Title Association
Appraisal Institute
The Appraisal Firm Coalition
Collateral Risk Network
Community Home Lenders Association
Consumer Bankers Association
Consumer Mortgage Coalition
Community Mortgage Lenders of America
Credit Union National Association

Housing Policy Council of the Financial Services
Roundtable
Independent Community Bankers of America
Mortgage Bankers Association
National Association of Federal Credit Unions
National Association of Home Builders
National Association of Mortgage Brokers
National Association of Realtors®
Real Estate Services Providers Council, Inc.
(RESPRO®)
Real Estate Valuation Advocacy Association

cc: Senator Mike Crapo
Senator Dean Heller
Senator Steve Daines
Senator Johnny Isakson
Senator Mike Rounds
Senator Pat Roberts
Senator Kelley Ayotte
Senator Angus King