



cuna.org

601 Pennsylvania Ave., NW | South Building, Suite 600 | Washington, DC 20004-2601 | PHONE: 202-638-5777 | FAX: 202-638-7734

January 13, 2012

Consumer Financial Protection Bureau  
1500 Pennsylvania Avenue NW (Attn: 1801 L Street)  
Washington, DC 20220

Attn: Mitchell E. Hochberg or Jane Gao, Office of Regulations

Re: Docket No. CFPB-2011-0043  
Comments regarding information gathering related to mortgage servicing  
model forms and disclosures

Dear Mr. Hochberg and Ms. Gao:

The Credit Union National Association (CUNA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (CFPB) notice and request for public comment regarding information gathering related to mortgage servicing model forms and disclosures. By way of background, CUNA is the nation's largest credit union trade organization, representing approximately 90 percent of our nation's 7,300 state and federal credit unions, which serve approximately 93 million members.

CUNA supports the purposes of the CFPB's information gathering efforts in order to design, develop and implement the required model forms. CUNA supports the CFPB's core objective in this effort to help refine specific features of the content and design of the mortgage servicing model forms to maximize communication effectiveness while minimizing compliance burden.

We also applaud the analytical and deliberative approach that the CFPB has taken thus far with regard to its various information gathering and rulemaking efforts. We encourage the CFPB to take such an approach with respect to mortgage servicing model forms by seeking information from a broad sample of industry participants and by releasing several draft model servicing forms for comment during the drafting period.

CUNA urges the CFPB to gather information from as broad a sample as possible in order to ensure the accuracy and comprehensiveness of data obtained. In this connection, we ask that CFPB gather information from participants in all areas of the mortgage servicing market, including credit unions and other small mortgage lenders and servicers. CUNA also requests that this process place emphasis on the compliance burden associated with adopting new model forms, and that the CFPB ensure that any compliance



OFFICES: | WASHINGTON, D.C. | MADISON, WISCONSIN

burden for servicers is minimized – especially for small servicers. Provided these steps are effectively taken, CUNA believes that this information gathering process could help minimize any compliance burden associated with adopting new model servicing forms, particularly for small servicers.

Thank you for the opportunity to comment on the notice and request for public comment regarding information gathering related to mortgage servicing model forms and disclosures. If you have any questions concerning our letter, please feel free to contact CUNA's Senior Vice President and Deputy General Counsel Mary Dunn or me at (202) 508-6776.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristina A. Del Vecchio". The signature is fluid and cursive, with a large initial "K" and "D".

Kristina A. Del Vecchio  
Counsel for Special Projects