



INDEPENDENT COMMUNITY
BANKERS of AMERICA®

November 17, 2015

The Honorable Paul Ryan
Speaker
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Nancy Pelosi
Democratic Leader
U.S. House of Representatives
Washington, D.C. 20515

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CAMDEN R. FINE
President and CEO

Dear Speaker Ryan and Democratic Leader Pelosi:

On behalf of the more than 6,000 community banks represented by ICBA, I write to express our support for two bills scheduled for floor consideration on November 18. ICBA urges all members of the House to vote YES on the following bills:

The Portfolio Lending and Mortgage Access Act (H.R. 1210). Sponsored by Rep. Andy Barr, H.R. 1210 would provide that any residential mortgage held in portfolio by the originator is a “qualified mortgage” for the purposes of the Consumer Financial Protection Bureau’s (CFPB’s) “ability to repay” rule. Qualified mortgage status shields lenders from heightened legal liability under that rule. When lenders hold mortgages in portfolio, they have every incentive to ensure that mortgages are conservatively underwritten and that borrowers have the ability to repay. The prospect of litigation only deters lending, especially for community banks, and curtails credit for credit worthy borrowers. Embodying a priority provision of ICBA’s Plan for Prosperity, H.R. 1210 is a simple, commonsense fix that would help preserve access to credit for customers of community banks and other lenders.

The Reforming CFPB Indirect Auto Financing Guidance Act (H.R. 1737). Sponsored by Rep. Frank Guinta, H.R. 1737 would effectively nullify the CFPB’s guidance on indirect auto lending. In proposing and issuing guidance primarily related to indirect auto financing, the CFPB would be required to provide for a public notice and comment period, make available all studies, data, and other information on which the guidance is based, and meet other requirements intended to ensure the process is open, transparent, and responsive to public input. The CFPB would also be required to consult with the Board of Governors of the Federal Reserve System, the Federal Trade Commission, and the Department of Justice. ICBA suggests strengthening H.R. 1737 by requiring the CFPB to also consult with the Federal banking regulators, the Federal Deposit Insurance Corporation and the Office of the Comptroller of the Currency.

Taken together, the bills noted above would provide significant regulatory relief for community banks to the benefit of the customers and communities they serve.

Thank you again for scheduling floor consideration of these important bills.

Sincerely,

/s/

Camden R. Fine
President & CEO

CC: Members of the U.S. House of Representatives

The Nation’s Voice for Community Banks.®

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