

May 5, 2015

The Honorable Steve Pearce
United States Representative
2432 Rayburn House Office Building
Washington, DC 20515

The Honorable Brad Sherman
United States Representative
2242 Rayburn House Office Building
Washington, DC 20515

Dear Representatives Pearce and Sherman:

The undersigned organizations thank you for introducing H.R. 2213, which will provide a reasonable hold-harmless period through the end of the year following the August 1 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 August 1st 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
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 Realtors
Real Estate Services Providers Council, Inc.
(RESPRO®)