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October 2, 2015

The Honorable Blaine Luetkemeyer
Chairman
Subcommittee on Housing and Insurance
House Committee on Financial Services
United States House of Representatives
2440 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Luetkemeyer:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only national trade association focusing exclusively on federal issues affecting the nation's federally insured credit unions, I write in response to your letter regarding the final implementation date for the Consumer Financial Protection Bureau's (CFPB) TILA-RESPA Integrated Disclosure Plan (TRID). We appreciate your continued interest in this issue.

As you know, NAFCU shares your concerns about third-party vendors being able to meet the looming deadline and we have been strong supporters of the *Homebuyer's Assistance Act* (H.R. 3192) that would provide some relief to financial institutions relative to immediate enforcement. On behalf of NAFCU and our members, thank you for everything you have done to highlight this issue in the Financial Services Committee and before the full House of Representatives.

While National Credit Union Administration Chairman Debbie Matz has indicated that NCUA will consider credit unions' "good faith efforts toward substantial compliance" relative to TRID, and CFPB Director Cordray has made similar statements, NAFCU and our members remain concerned over how the CFPB will enforce this new regulation as there are several ambiguities they have failed to clarify.

Thanks again for your continued interest and support on this critical issue. NAFCU's regulatory compliance team is on the front lines assisting member credit unions relative to the TRID process, and we will keep you apprised of our observations moving forward.

If we can be helpful to you in any way, please do not hesitate to contact me or NAFCU's Associate Director of Legislative Affairs, Chad Adams, at 703-842-2265 or cadams@nafcu.org.

Sincerely,

B. Dan Berger

cc: The Honorable Randy Neugebauer