

May 15, 2013

The Honorable Steve Stivers  
United States Representative  
1022 Longworth House Office Building  
Washington, DC 20515

Dear Congressman Stivers:

The undersigned organizations thank you for your Dear Colleague letter asking Members of Congress to join a sign-on letter asking the Consumer Financial Protection Bureau (CFPB) to provide consumers with needed flexibility to avoid costly delays to closing when buying a home or refinancing a mortgage.

Under the CFPB's proposed rule, "Integrated Mortgage Disclosures Under the Real Estate Settlement Procedures Act (Regulation X) and the Truth In Lending Act (Regulation Z)", the borrower must receive their final Closing Disclosure three business days prior to closing. If during this three day period, a cost the borrower will pay to close, aside from loan costs, increases (subject to very limited exceptions), the borrower must be given a new updated Closing Disclosure and wait three additional business days before they can close.

In a typical real estate transaction, changes frequently occur in the three days prior to closing that could increase a borrower's cost to close. Without additional flexibility, the CFPB's proposed rule could cause costly delays to closing that harm consumers by reducing their ability to make reasonable changes to their purchase, increasing their costs, putting at risk their mortgage rate lock and even the expiration of their purchase contract and earnest money deposit to the seller.

Thank you for working with the CFPB to ensure consumers have the needed flexibility to prevent costly delays to closing and explore options that balance the intent of the Bureau's proposed rule with how it would apply to consumers in the market.

Sincerely,

American Bankers Association  
American Escrow Association  
American Financial Services Association  
American Land Title Association  
Community Mortgage Lenders of America  
Consumer Bankers Association  
Consumer Mortgage Coalition

Credit Union National Association  
National Association of Federal Credit Unions  
National Association of Home Builders  
National Association of Mortgage Brokers  
National Association of Realtors  
Real Estate Valuation Advocacy Association  
RESPRO®