



NATIONAL ASSOCIATION OF REALTORS®

*The Voice For Real Estate®*

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September 22, 2010

Ms. Jennifer J. Johnson  
Secretary, Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

Re: Docket No. OP-1388

Dear Ms. Johnson:

The National Association of REALTORS® (NAR), representing 1.1 million real estate professionals, submits the following comments for the record of the September 24, 2010 public hearing in Washington, DC on potential revisions to Regulation C, which implements the Home Mortgage Disclosure Act (HMDA). We believe that HMDA data have been helpful to regulators, policy makers and researchers in the years since enactment, but we also believe that implementation of Regulation C can and should be updated to compensate for the significant advances in information collection and dissemination technologies in recent years.

NAR strongly suggests consideration of the following issues:

1. Addition of underwriting data such as a borrower's credit score, loan to value ratio, combined loan to value ratio, and borrower's debt to income ratio. All four of these metrics could be used to evaluate fairness in lending.
2. HMDA should include the borrower's age. NAR believes that including a borrower's age would help to identify another area of possible discrimination. This data is readily available to the lender and privacy can be maintained by reporting in age ranges rather than specific borrower age.
3. HMDA should include the loan originator channel. As shown in recent years, the quality of the lending process can vary by originator. This information will enable monitoring of loan originators with different incentives.
4. HMDA should report the rate spreads for all loans not just high priced loans. Relative credit rates can be an insightful tool in the evaluation of discriminatory practices. The current system for culling this data on high priced loans might be utilized for all loans.

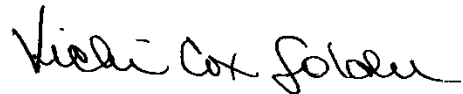
We also call to your attention the following issues. NAR believes that HMDA data should be published on a quarterly basis, thus reducing the "lag" time from 17 months to 8. At present HMDA data are released on an annual basis eight months after the end of the reporting period. Reporting on a quarterly basis, surely possible in today's information technology setting, would by definition reduce the "lag" time, thus making the data more relevant and useful for the public. Moreover, on a related issue, we believe that reporting the date or at least the week on an aggregated basis of when a mortgage is made would be of great use in gauging and analyzing demand.

With the current state of the housing market being impacted by foreclosures, NAR believes that collecting and disseminating information on refinanced loans made pursuant to various loan modification programs would aid policy makers and the public to evaluate the fairness in which these plans are conducted. A flag for the type of loan modification (e.g. principal reduction, extension of loan duration, rate reduction, combination, etc.) would allow for timely evaluation of individual programs. Privacy concerns would be honored by aggregating at the zip code level.

Similarly, mortgage loans made in Neighborhood Stabilization Program (NSP) neighborhoods can be used to measure the success of a significant federal investment in those communities. While collection of this data might be difficult for lenders, a proxy for NSP-related loans could be local grants used to purchase and rehabilitate properties. This information could be collected during underwriting (along with income, gifts, etc.) and aggregated at the zip code level to ease privacy concerns that may arise.

Thank you for the opportunity to provide these comments. If you have any questions please feel free to contact me or William Gilmartin (at 202 383-1102) at any time. We will be happy to work with you to assure the continued success of the HMDA reporting process.

Sincerely,

A handwritten signature in black ink that reads "Vicki Cox Golder". The signature is written in a cursive, flowing style.

Vicki Cox Golder, CRB  
2010 President, National Association of REALTORS®