

## Attachment 2 to Concise Explanatory Statement

### 2010 Consumer Loan Act Rulemaking (Laws of 2010)

#### Index of Written Comments

Doc. No.	Date	Commenter and Response
1.	Mar 26	Warren Tessler, Trust Accounting Center. Comment about assessment methodology. RESPONSE: the assessment method was studied using potential licensee's information, information gathered from other states regulatory programs, and an analysis of the cost to DFI to regulate this industry. The final proposed rules reflect this analysis.
2.	Apr 26	Warren Tessler, Trust Accounting Center. Description of business, comments on assessment and examination. RESPONSE: the existing rules in the CLA for examinations were not changed. As with all examinations, DFI will tailor the examination to the company. Loan servicers will only be expected to provide the documentation salient to their business as a residential mortgage loan servicer and other documentation necessary for DFI to determine the company's compliance with the act. Regarding the assessment methodology, see the RESPONSE in No. 1 above.
3.	May 28	Dana Clark, Hudson Cook LLP. Question about loan servicing fees. Follow up with examples of fees. RESPONSE: DFI used the information provided, along with information from other sources to write the section on fees.
4.	Jun 10	Brian Haveman, Summit Mortgage Corporation. Change three days to three business days. RESPONSE: DFI made changes to the proposed rules in light of this comment.
5.	Jun 25	Marcus Holling, United Finance. Comment about mixing mortgage versus non-mortgage rule provisions. RESPONSE: DFI acknowledges this concern and invites the licensee to work legislatively to accomplish this change.
6.	Jun 30	Lisa Klika, Guild Mortgage. Multiple comments on draft rules. Advertising, webpage content, assessment, servicing requirements. RESPONSE: DFI used this information and made multiple changes based on these comments.
7.	Jul 15	Lisa Klika, Guild Mortgage. Tracking location of borrower versus location of property. Most servicers track by location of property. RESPONSE: DFI acknowledges this comment.
8.	Jul 21	Costas Avrakotos, K&L Gates. Who is and is not a servicer. RESPONSE: DFI made changes to the proposed rules based on this comment.
9.	Jul 28	Warren Tessler, Trust Accounting Center. Crediting of receipts, paying escrowed amounts. RESPONSE: DFI made changes to the proposed rules based on these comments.
10.	Aug 6	Aspen Richter, Compliance Ease. Disclosing discount fees on the GFE

		and HUD. RESPONSE: DFI made changes to the proposed rules based on these comments.
11.	Aug 17	Costas Avrakotos, K&L Gates. Who is and is not a loan servicer. RESPONSE: The proposed rules take this comment into consideration. See also No. 8 above.
12.	Sep 16	Tom Echols, Washington Financial Services Association. Concerns that the Consumer Loan Act regulates both residential and non-residential lending. Specific comments on the following sections: 231, 420, 560(2), 830, 900. RESPONSE: DFI made changes to the proposed rules based on these comments. See also No. 5 above.