From: John McNeel

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Subject: EGRPRA

Comments:

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Your comment: Shouldn't all references to single-item analysis be deleted from Reg. X (RESPA) now that aggregate adjustment amounts are no longer displayed on GFE 2010s or the Loan Estimates that will replace them? Single-item analysis is where lenders were required to disclose escrow reserves on the old GFE. This outdated method resulted in excess escrow reserves that had to be adjusted with an "Aggregate Adjustment" to reconcile the old single-item analysis method with the aggregate analysis (checkbook) method. This requires Calyx users to prepare the old GFE (called a fees worksheet now) just to prepare the GFE 2010 properly. Below are the regs to which I am referring: RESPA 1024.7 (b) - Aggregate (or) Composite Analysis - Single Item Analysis (j) - Formats for Annual Escrow Account Statement (single item analysis)