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**Office of the Comptroller of the  
Currency**  
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regs.comments@occ.treas.gov

**Ms. Jennifer J. Johnson, Secretary**  
Board of Governors of the  
Federal Reserve System  
20th Street and Constitution  
Avenue, N.W.  
Washington, D.C. 20551  
regs.comments@federalreserve.gov

**Mr. Robert E. Feldman**  
Executive Secretary  
Attention: Comments  
Federal Deposit Insurance Corporation  
550 17th Street, N.W.  
Washington, D.C. 20429  
Comments@fdic.gov

**Mr. Gary K. Van Meter**  
Deputy Director  
Office of Regulatory Policy  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, Virginia 22102-5090  
reg-comm@fca.gov

**Ms. Mary F. Rupp**  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428  
regcomments@ncua.gov

**Re: Loans in Areas Having Special Flood Hazards; Interagency Questions and Answers  
Regarding Flood Insurance; OCC Docket OCC-2011-0024; FRB Docket No. OP-1431;  
FDIC RIN No. 3064-ZA00; FCA RIN 3052-AC46; NCUA RIN 3133-AD41**

Dear Madam or Sir:

As a market leader in the flood determination industry, CoreLogic has a unique perspective on federal flood insurance regulations and how they impact the nation's regulated lenders, service providers, and consumers. We thank you for the opportunity to share our comments on the proposed revisions to the Interagency Questions and Answers Regarding Flood Insurance (the "Q&A").

Our understanding is that the Q&A is intended to provide official guidance to address technical compliance issues faced by lenders and services (74 FR 35914, 35916). We wholeheartedly

agree that such guidance is greatly needed. However, we note that in some cases, the Q&A goes beyond technical compliance issues, and into the territory of "best practices" and "recommendations." These include references to escrowing on loans beyond what is required by law, selecting a private flood insurance policy, referencing FEMA's map modernization program, requiring additional notices be sent to borrowers (expiration notice and Notice of Special Flood Hazards), conditions found within mortgage loan contracts, among others.

It is our position that compliance obligations should be clear, separate and distinct from any encouragement to go beyond such obligations by adopting best practices. It is absolutely necessary to know the line of demarcation between compliance with the law and recommendations that go beyond the legal requirements.

As currently written, the Q&A does not clearly separate these two concepts, the result of which may be confusion and/or burdensome system and procedural changes due to concerns over compliance and liability issues. We would encourage the Q&A to be further revised to address this most important concern.

We very much appreciate the opportunity to provide these comments for your consideration. We also hope that you will provide for an additional public comment period related to any further modification of the Q&A prior to its final publication.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vicki Chenault", with a long horizontal flourish extending to the right.

Vicki Chenault  
Senior Vice President  
CoreLogic Escrow Services