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August 1, 2011

Mr. Randolph Hwang  
Docket Manager  
1851 Alexander Bell Drive  
Suite 350  
Reston, VA 20191

Re: "Credit Risk Retention," HUD Docket No. FR-5504-P-01

Dear Sir:

Enclosed is a disc containing more than 10,000 public comments raising concerns about the Credit Risk Retention proposed rule. We have coordinated these comments for these consumers for your convenience.

We have prepared this file in accordance to directions received from speaking with the Regulations.gov Help Desk. Per their request we have bifurcated the files between the letters personalized by consumers and the responses collected without any personalization to our form letter.

If you have any questions, please feel free to contact Jeff Lischer, NAR Managing Director for Regulatory Policy, 202.383.1117 or [jlischer@realtors.org](mailto:jlischer@realtors.org).

Sincerely,

Ron Phipps, ABR, CRS, GRI, GREEN, e-PRO, SFR  
2011 President, National Association of REALTORS®

cc:  
Honorable Timothy F. Geithner  
Secretary  
Department of the Treasury  
1500 Pennsylvania Ave. NW  
Washington, DC 20220



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Honorable Shaun Donovan  
Secretary  
Department of Housing and Urban  
Development  
*Attn: Regulations Division, Office of General Counsel*  
*451 7<sup>th</sup> Street, S.W., Room 10276*  
Washington, DC 20410-0500  
**Docket No. FR-5504-P-01**

Honorable Ben S. Bernanke  
Chairman  
Board of Governors of the  
Federal Reserve System  
*Attn: Jennifer J. Johnson, Secretary*  
20<sup>th</sup> Street and Constitution Avenue N.W.  
Washington, DC 20551  
**Docket No. R-1411**

Mr. Edward J. DeMarco  
Acting Director  
Federal Housing Finance Agency  
*Attn: Alfred M. Pollard, General Counsel*  
1700 G Street N.W., Fourth Floor  
Washington, DC 20552  
**Comments/RIN 2590-AA43**

Honorable Martin J. Gruenberg  
Acting Chairman  
Federal Deposit Insurance Corporation  
*Attn: Robert E. Feldman - Comments*  
550 17<sup>th</sup> Street Building  
Washington, DC 20429  
**RIN 3064-AD74**

Honorable Mary L. Shapiro  
Chairman  
Securities and Exchange Commission  
*Attn: Elizabeth M. Murphy, Secretary*  
100 F Street N.E.  
Washington, DC 20549  
**File Number S7-14-11**

Mr. John G. Walsh  
Acting Comptroller  
Office of the Comptroller of the Currency  
250 E Street S.W., Mail Stop 2-3  
Washington, DC 20219  
**Docket Number OCC-2011-0002**

Jul 7, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

Subject: Credit Risk Retention (Document ID HUD-2011-0056-0001)

Dear U.S. Department of Housing and Urban Development,

I am writing this letter to voice my concerns with the proposed Risk Retention and Qualified Residential Mortgage (QRM) rule.

When a person buys a house, there is a significant cash investment required. This includes a down payment, closing costs (typically 3-5% of the loan amount), and other costs. By requiring a down payment of 20% or more and creating unduly tight credit standards to qualify for a QRM, you will be placing home ownership out of reach for millions of potential buyers and crippling an already fragile housing recovery. Experts advise that non-QRM loans will cost consumers much more than QRM loans meaning many potential home owners will either pay more needlessly or be excluded from achieving the American Dream.

Based on 2010 estimates of median income and home prices from the National Association of REALTORS® and the 2010 national savings rate, it would take 9.5 years for the typical American family to save enough money for a 10 percent down payment and closing costs, and fully 16 years to save for a 20 percent down payment and closing costs. A 10 or 20 percent down payment requirement for the QRM means that even the most creditworthy and diligent first-time homebuyer cannot qualify for the lowest rates and safest products in the market. As a result, responsible consumers who maintain good credit and seek safe loan products will be forced into more expensive mortgages under the terms of the proposed rule simply because they do not have 10 or 20 percent or more in down payment or even more equity for refinancing.

Weak underwriting and toxic mortgages are the main cause of mortgage defaults, not well-underwritten mortgages that allow for low down payments. Requiring a higher down payment and rigid credit standards does little to reduce risk of default, but rather creates unnecessary barriers for responsible consumers looking to purchase or refinance a home. I strongly encourage you to define QRM based on sound underwriting and safe mortgage products, not criteria that do little to increase safety but that deny millions of Americans access to the best mortgages.

Sincerely,  
Mr. Seth Merritt

Jul 8, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

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Dear U.S. Department of Housing and Urban Development,

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Sincerely,  
Mrs. Kim Smith

Jul 29, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

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Sincerely,  
Mr. Brad Johnson

Jul 29, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

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Sincerely,  
Mr. Hank Holden

Jul 29, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

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Sincerely,  
Mr. Patrick Voltaire

Jul 29, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

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Based on 2010 estimates of median income and home prices from the National Association of REALTORS® and the 2010 national savings rate, it would take 9.5 years for the typical American family to save enough money for a 10 percent down payment and closing costs, and fully 16 years to save for a 20 percent down payment and closing costs. A 10 or 20 percent down payment requirement for the QRM means that even the most creditworthy and diligent first-time homebuyer cannot qualify for the lowest rates and safest products in the market. As a result, responsible consumers who maintain good credit and seek safe loan products will be forced into more expensive mortgages under the terms of the proposed rule simply because they do not have 10 or 20 percent or more in down payment or even more equity for refinancing.

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Sincerely,  
Ms. Marie Wilhite

Jul 29, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

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We have been trying to sell our house for over year. It is a nice place that is located in small college town and we are willing to negotiate on the price, but those hired by the university (the largest employer in the area) are afraid to make an offer because of legislation like this.

We would like to buy a house in our new location, but can't because we have to sell our current home first. If you want to continue to ruin the economy keep doing what you are doing. If truly care about righting the ship then do something out of the ordinary - apply logic and common sense and make your decisions based on what is best for the vast majority of the US population.

Based on 2010 estimates of median income and home prices from the National Association of REALTORS<sup>®</sup> and the 2010 national savings rate, it would take 9.5 years for the typical American family to save enough money for a 10 percent down payment and closing costs, and fully 16 years to save for a 20 percent down payment and closing costs. A 10 or 20 percent down payment requirement for the QRM means that even the most creditworthy and diligent first-time homebuyer cannot qualify for the lowest rates and safest products in the market. As a result, responsible consumers who maintain good credit and seek safe loan products will be forced into more expensive mortgages under the terms of the proposed rule simply because they do not have 10 or 20 percent or more in down payment or even more equity for refinancing.

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Sincerely,  
Ms. Jennifer Allison

Jul 29, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

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Based on 2010 estimates of median income and home prices from the National Association of REALTORS<sup>®</sup> and the 2010 national savings rate, it would take 9.5 years for the typical American family to save enough money for a 10 percent down payment and closing costs, and fully 16 years to save for a 20 percent down payment and closing costs. A 10 or 20 percent down payment requirement for the QRM means that even the most creditworthy and diligent first-time homebuyer cannot qualify for the lowest rates and safest products in the market. As a result, responsible consumers who maintain good credit and seek safe loan products will be forced into more expensive mortgages under the terms of the proposed rule simply because they do not have 10 or 20 percent or more in down payment or even more equity for refinancing.

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Sincerely,  
Mrs. Cathy Clower

Jul 29, 2011

U.S. Department of Housing and Urban Development  
Washington, DC

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Based on 2010 estimates of median income and home prices from the National Association of REALTORS® and the 2010 national savings rate, it would take 9.5 years for the typical American family to save enough money for a 10 percent down payment and closing costs, and fully 16 years to save for a 20 percent down payment and closing costs. A 10 or 20 percent down payment requirement for the QRM means that even the most creditworthy and diligent first-time homebuyer cannot qualify for the lowest rates and safest products in the market. As a result, responsible consumers who maintain good credit and seek safe loan products will be forced into more expensive mortgages under the terms of the proposed rule simply because they do not have 10 or 20 percent or more in down payment or even more equity for refinancing.

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Sincerely,  
Mr. Robert McLean

Jul 29, 2011

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Washington, DC

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Let the president and congress give up their income to help American because their not doing much to help America. I could go on and on, it's about money not preserving our country.

Based on 2010 estimates of median income and home prices from the National Association of REALTORS<sup>®</sup> and the 2010 national savings rate, it would take 9.5 years for the typical American family to save enough money for a 10 percent down payment and closing costs, and fully 16 years to save for a 20 percent down payment and closing costs. A 10 or 20 percent down payment requirement for the QRM means that even the most creditworthy and diligent first-time homebuyer cannot qualify for the lowest rates and safest products in the market. As a result, responsible consumers who maintain good credit and seek safe loan products will be forced into more expensive mortgages under the terms of the proposed rule simply because they do not have 10 or 20 percent or more in down payment or even more equity for refinancing.

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Sincerely,  
Mrs. Nancy Carney