



June 29, 2015

Michael L. Stevens
Senior Executive Vice President
Conference of State Bank Supervisors
1129 20th St. NW, 9th Floor
Washington, DC 20036

**Re: Proposed Regulatory Prudential Standards for Non-Bank Mortgage Servicers
(Supplemental Comments)**

Dear Michael:

On behalf of the Manufactured Housing Institute ("MHI"), thank you for meeting with us recently to discuss MHI's earlier comment letter regarding the Conference of State Bank Supervisors' MSR Task Force's ("Task Force") *Proposed Regulatory Prudential Standards for Non-Bank Mortgage Servicers* (the "Proposed Standards"). The purpose of this letter is to follow up on our meeting and to supplement MHI's previous comments.

First, MHI reiterates its position that the Task Force specify that the Proposed Standards are only meant to apply to transactions secured by real estate and **are not meant to cover chattel-only transactions**. If the Task Force determines that the Proposed Standards must extend to chattel-only transactions, MHI also reiterates its call for a small-servicer exemption. As we discussed at our meeting, MHI refers the Task Force to the small servicer exemptions contained in Regulation Z at 12 C.F.R. § 1026.41(e)(4) and in Regulation X at 12 C.F.R. § 1024.30(b)(1).

Additionally, at our meeting you indicated the Proposed Standards are not meant to cover portfolio lenders (e.g., those who originate and service their own loans). MHI recommends this intent of scope be specifically set forth in the final Executive Summary and any subsequent legislative/regulatory text that may flow therefrom.

Sincerely,

Richard L. Robinson
General Counsel
Sr. VP State & Regulatory Affairs

Cc: John "Buz" Gorman