



September 21, 2020

Comments Intake  
Bureau of Consumer Financial Protection  
1700 G Street NW,  
Washington, DC, 20552  
[www.regulations.gov](http://www.regulations.gov)  
Docket No. CFPB-2020-0023; RIN 3170-AA83

**Re: Proposed Rule to Implement Higher-Priced Mortgage Loan Escrow Exemption;  
Docket No. CFPB-2020-0023; RIN 3170-AA83**

Dear Sirs and Madams,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing approximately 220 state and nationally chartered banks, savings banks, and savings and loan associations located in communities throughout the State. The Bureau of Consumer Financial Protection (CFPB) issued a proposed rule to implement the Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA) section 108 statutory directive. WBA appreciates the opportunity to comment on the proposed rule.

The proposed rule creates a new section of Regulation Z which would exempt from the regulation's higher-priced mortgage loan (HPML) escrow requirements any loan made by a financial institution that is secured by a first lien on the principal dwelling of a consumer if: (1) the institution has assets of \$10 billion or less; (2) the institution and its affiliates originated 1,000 or fewer loans secured by a first lien on a principal dwelling during the preceding calendar year; and (3) meets certain existing HPML escrow exemptions criteria. The new exemption is in addition to existing HPML escrow exemptions.

To help alleviate the potential that an institution inadvertently makes itself ineligible for the new exemption, the proposal would also modify a May 1, 2016 date within the current HPML escrow exemption requirements to a new end date that will be approximately 90 days after the effective date of the forthcoming final rule. The proposal also removes certain obsolete text and reinserts inadvertently deleted comments from the regulation.

WBA generally supports the revisions proposed by CFPB; however, WBA recommends the 90 days prerequisite against establishing escrows be extended to no less than 120 days after the effective date of the final rule as additional time is needed for financial institutions to identify and adapt to the changes made by the rule. WBA believes the proposed changes implement the regulatory relief intended by Congress under the enactment of EGRRCPA and help clarify HPML escrow requirements and exemptions thereof.

WBA appreciates CFPB's actions to implement EGRRCPA section 108 and for the opportunity to comment.

Respectfully,

A handwritten signature in black ink that reads "Rose Oswald Poels".

Rose Oswald Poels  
President/CEO