

September 24, 2014

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
Attention: 1557-NEW
400 7th Street, S.W. Suite 3E-218
Washington D.C. 20219

Subject: Agency Information Collection Activities: Proposed Information Collection: Comment Request: *Domestic First Lien Residential Mortgage Data*

I appreciate the opportunity to comment on the Office of the Comptroller of the Currency's (OCC) proposal to collect comprehensive first-lien residential mortgage data. The OCC invites comments on whether the collection of detailed mortgage data is necessary for the proper performance of the OCC's function, and ways to minimize the burden of collection on respondents.

The OCC proposes to collect *monthly loan-level data* on residential mortgage loans to include, *inter alia*: property and mailing address; unspecified "loan documentation information"; debt-to-income ratios; and lien position data in order to match senior and junior liens by property ID. The OCC states that collecting this information is vital to monitoring credit quality and loan mitigation activities and that this data is necessary to support supervisory activities and ensure a safe and sound Federal banking system.

My comments are as follows:

1. Since the vast majority loan-level data will not change month-over-month, the OCC should explain why it is important to collect this information *monthly* rather than *once a quarter*.¹ Given the burden of monthly collection, the cost-benefit should be documented and justified.
2. The OCC should provide facts to show that *loan-level* data, rather than *pool-level* data, significantly improves the agency's ability to supervise credit risk. Pool-level data is less burdensome to collect and helps protect the confidentiality of borrowers' personal information. The OCC should explain why it needs very granular information to monitor the safety and soundness of the Federal banking system.
3. Loan-level data contains the sensitive personal information of borrowers. The OCC should articulate the controls it has to ensure such information is not improperly accessed or abused (e.g., a rogue OCC employee or contractor checks out his neighbors via a '*property and mailing address*' lookup).
4. Requiring national banks and Federal savings associations to incur the burden and cost of providing monthly submissions – a burden *state-chartered* institutions do not have – puts these institutions at a competitive disadvantage. Please remember that data submissions are often

¹ Month over month, the only data that will be "new" is loan originations, loan payoffs, and minor updates to the payment and bankruptcy/foreclosure status of existing loans. Most data fields proposed for collection will not change between consecutive months.

accompanied by additional inquiries and follow-up requests from OCC examiners; the cost is not limited to data submission.

5. Historically, bank supervisors have monitored credit quality via the use of regular onsite examinations and the monitoring of "*trends*" in basic metrics such as the level of past due loans, nonaccrual loans, criticized and classified loans, and troubled debt restructurings (to name just a few). The OCC should explain why these time-tested methods are no longer sufficient without the addition of the proposed collection of monthly loan-level data.

I appreciate the opportunity to comment. I wish the agency the best of luck.

Sincerely,

Sandra A. Holly
Hyattsville, MD