



MORTGAGE BANKERS ASSOCIATION

August 19, 2020

Office of the Comptroller of the Currency  
Chief Counsel's Office  
Attn: Comments Processing  
400 7<sup>th</sup> Street SW  
Washington, DC 20219

David P. Grahn, Director, Office of  
Regulatory Policy  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, VA 22102-5090

Ann E. Misback, Secretary  
Board of Governors of the Federal Reserve  
System  
20th Street and Constitution Avenue, NW  
Washington, DC 20551

Gerard P. Poliquin, Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

Robert E. Feldman, Executive Secretary  
Attention: Comments/Legal ESS  
Federal Deposit Insurance Corporation  
550 17th St NW  
Washington, DC 20429

**Re: Request for Extension of Response Period: Loans in Areas Having Special Flood Hazards; Interagency Questions and Answers Regarding Flood Insurance (Docket ID OCC-2020-0008; Docket No. OP-1720; RIN 3064-ZA16; Docket No. FCA RIN 3052-AD42; NCUA RIN 3133-AF14)**

Dear Ladies and Gentlemen:

The Mortgage Bankers Association (MBA) appreciates the collective action of the Office of the Comptroller of the Currency (OCC), the Board of Governors of the Federal Reserve System (Board), the Federal Deposit Insurance Corporation (FDIC), the Farm Credit Administration (FCA), and the National Credit Union Administration (NCUA) ("the Agencies") to release the proposed Interagency Questions and Answers Regarding Flood Insurance ("proposed Q&As").<sup>1</sup>

In light of the impacts of the COVID-19 pandemic, and the significant reorganization and revision of—and additions to—the previous Flood Questions and Answers ("previous Q&As"), MBA requests a 60-day extension to the September 4, 2020 comment deadline.

The MBA member experts on flood insurance issues are residential and commercial mortgage servicing personnel who are also inundated with managing and mitigating borrower impacts of

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<sup>1</sup> 85 Fed. Reg. 40442 (July 6, 2020); available at <https://www.federalregister.gov/documents/2020/07/06/2020-14015/loans-in-areas-having-special-flood-hazards-interagency-questions-and-answers-regarding-flood>

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the pandemic. This extension will allow us, and our members, to better assess the revisions in a comprehensive manner and to provide appropriate feedback on their effects

MBA welcomes the opportunity to provide feedback on flood insurance Q&As in proposal form; and we believe it important for stakeholders to have the time they need to respond in a comprehensive manner.

MBA supports the Agencies' commitment to provide clear and articulate guidance as it relates to implementation of the Flood Act, and we appreciate the opportunity to participate in that process. We look forward to continuing this dialogue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Flood', with a stylized flourish at the end.

Mike Flood  
Senior Vice President, Commercial & Multifamily  
Mortgage Bankers Association