



**Consumer Credit Industry Association**  
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August 19, 2020

via email to [regs.comments@occ.treas.gov](mailto:regs.comments@occ.treas.gov), [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov),  
[comments@fdic.gov](mailto:comments@fdic.gov)

Office of the Comptroller of the Currency  
Chief Counsel's Office Attention:  
Comment Processing 400 7th  
Street, SW.  
Suite 3E-218  
Washington, DC 20219

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

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

RE: Loans in Areas Having Special Flood Hazards; Interagency Questions and Answers  
Regarding Flood Insurance (Docket ID OCC-2020-0008; Docket No. OP-1720; RIN 3064ZA16)

To Whom It May Concern:

The Consumer Credit Industry Association (“CCIA”)<sup>i</sup> greatly appreciates the joint efforts 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 (“Interagency Q&A”).<sup>ii</sup>

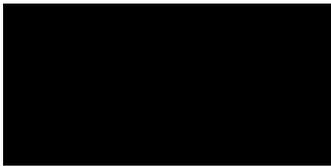
Since the passage of the 2012 Biggert-Waters Act, the 2014 Homeowners Flood Insurance Affordability Act, and the 2019 Joint Final Rule on private flood insurance, industry and

regulators have wrestled with numerous issues. The Interagency Q&A is thus essential to provide additional clarity and further guidance to the marketplace, including CCIA member companies.

The Agencies clearly embarked on and delivered a comprehensive review of the existing Questions and Answers, with significant effort to reorganize, revise and also create new questions. The Interagency Q&A is not only comprehensive, but also complex, entailing considerable interdependencies among the answers. Accordingly, we respectfully ask for an additional 60 days from the current September 4, 2020 comment deadline to provide a thoughtful response to the Interagency Q&A.

Thank you for considering this request.

Sincerely,



Tom Keepers

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<sup>i</sup> CCIA is a national trade association representing manufacturers, administrators and distributors of lender and consumer protection products such as lender-placed hazard and lender-placed flood insurance.

<sup>ii</sup> <https://www.federalreserve.gov/newsevents/pressreleases/files/bcreg20200626a1.pdf>