

**From:** [Miller, Renata](#)  
**To:** [thirdpartylending](#)  
**Subject:** Proposed Guidance for Third-Party Lending  
**Date:** Monday, August 01, 2016 11:41:00 AM

---

This message was sent securely using ZixCorp.

Good morning,

I have reviewed the Proposed Guidance for Third-Party Lending, and I was not clear if this also covers warehouse line relationships where the Banks only gets partial interest in the loan notes that's split between multiple Banks (each funding a small portion of the loan from individually approved warehouse lines). In my opinion, this type of relationship will and should fall under this guidance; however, the description/ definition of 'significant aspect of lending' does not contain references to note assignments.

Thank you.

Renata

**RENATA MILLER**

Vice President | Commercial Lending Risk Management Officer

**BOSTON PRIVATE**

10 Post Office Square| Boston, MA 02109

p:(617) 912-4379

f:(617) 912-3989

[BostonPrivate.com](http://BostonPrivate.com)

[rmiller@bostonprivate.com](mailto:rmiller@bostonprivate.com)

---

This message was secured by [ZixCorp](#)<sup>(R)</sup>.