



October 15, 2007

Office of the Comptroller of the Currency
250 E Street, S.W.
Mail Stop 1-5
Washington, DC 20219
Docket ID OCC-2007-0013

Jennifer J. Johnson
Secretary
Board of Governors of the Federal
Reserve System
20th Street and Constitution Avenue,
N.W.
Washington, DC 20551
Docket No. OP-1292

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, DC 20429
Attention: Comments

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.
Washington, DC 20552
Attention: ID OTS-2007-0016

Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Dear Sir or Madam:

The Conference of State Bank Supervisors (CSBS), the American Association of Residential Mortgage Regulators (AARMR), and the National Association of Consumer Credit Administrators (NACCA) appreciate the opportunity to offer comments on the *Proposed Illustrations of Consumer Information for Subprime Mortgage Lending*.

CSBS, AARMR, and NACCA agree the proposed illustrations will be useful to institutions as they work to implement the consumer protection provisions of the Interagency Statement on Subprime Mortgage Lending. In addition, CSBS, AARMR, and NACCA believe these illustrations are applicable to state-supervised entities subject to similar guidance on subprime mortgage lending issued by the states.

The illustrations proposed by the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of Thrift Supervision, and the National Credit Union Administration (collectively,

the Agencies) represent a good step towards improved consumer disclosures. However, the states, through CSBS, AARMR, and NACCA, continue to believe that existing disclosures for home mortgages can be overly cumbersome and confusing. To that end, we commend the Federal Reserve Board for conducting a comprehensive review of disclosures for home-secured credit, which is currently underway. We look forward to continuing to work with the Agencies in the future in an effort to create a more meaningful and timely disclosure process for all mortgage transactions.

Thank you for your consideration, and we invite you to call on us if we can provide additional information.

Best personal regards,

A handwritten signature in black ink that reads "Neil Milner". The signature is written in a cursive style with a large, prominent "N" and "M".

Neil Milner
President and CEO, CSBS

A handwritten signature in black ink that reads "David Bleicken". The signature is written in a cursive style with a large, prominent "D" and "B".

David Bleicken
President, AARMR

A handwritten signature in black ink that reads "Joe Mulberry". The signature is written in a cursive style with a large, prominent "J" and "M".

Joe Mulberry
President, NACCA