FORM LETTER A

I am writing to express my support for the renewal of the information collections outlined in the Notice and request for comment, specifically OMB Control No. 3064–0022, 3064–0137, and 3064–0148. The commitment to transparency and risk management demonstrated by these collections is crucial for maintaining the stability and integrity of financial institutions.

While I appreciate the comprehensive framework and guidance provided in the existing collections, I would like to suggest the addition of mandatory reporting for sections 2 and 3. Mandatory reporting would enhance transparency and accountability, providing a more robust mechanism for evaluating and addressing risks associated with asset securitization activities and complex structured finance transactions.

For Section 2, "Interagency Guidance on Asset Securitization Activities," making documentation of fair value, asset securitization policies, and MIS improvements mandatory would strengthen risk management practices. This would not only benefit institutions in managing their activities more effectively but also assist regulators, like the FDIC, in evaluating the quality of risk management practices across the industry.

Similarly, for Section 3, "Interagency Statement on Sound Practices Concerning Complex Structured Finance Transactions," introducing mandatory reporting for complex structured finance transactions would be valuable. This addition would ensure that financial institutions maintain formal, written policies and procedures, providing a clearer picture of risk identification and assessment.

These modifications align with the ongoing efforts to uphold the safety and soundness of financial institutions. I believe that mandatory reporting would contribute to the overall effectiveness of the regulatory framework.

Thank you for considering my input. I believe these adjustments would further enhance the utility and clarity of the information collected and contribute to the continuous improvement of risk management practices.