

## Law Department

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January 16, 2002

### VIA FAX (202-414-6504) & OVERNIGHT MAIL

Mr. Alfred M. Pollard  
General Counsel  
Office of Federal Housing Enterprise Oversight  
1700 G Street, NW, Fourth Floor  
Washington, DC 20552

Re: United Guaranty Residential Insurance Company (United Guaranty) Request for Extension of Time To Comment and Respond to RBC Stress Test Modifications in the December 18, 2001 Federal Register

Dear Mr. Pollard:

This is to confirm the request for an extension of time made on behalf of United Guaranty by Mr. Fred Fielding on December 26, 2001 in his meeting with you. At that time Mr. Fielding requested extension of time to comment and respond to the December 18, 2001 revisions to the risk-based capital stress test published in the September 13, 2001 *Federal Register* for the government sponsored enterprises (GSE), Federal National Mortgage Association and Federal Housing Loan Mortgage Corporation, regulated by OFHEO. Since I understand that you have already denied a request for an extension of time made by General Electric Mortgage Insurance Corporation, I not make any detailed arguments in this letter why an extension is appropriate.

Although Mr. Fielding requested an extension of the comment period until March 31, 2002, I now must request additional time. United Guaranty now respectfully requests an extension of the comment period until one-hundred twenty (120) days after such time as OFHEO is able to provide working models of the risk-based capital stress test to the public with adequate GSE starting point data. This will permit adequate time to enable us to present our views in a manner that is as comprehensive and as helpful to OFHEO as possible.

Sincerely yours,

Richard L. Gray

RLG/sn

cc: Messrs. William V. Nutt, Jr. & Daniel T. Walker, United Guaranty  
Mr. Fred F. Fielding

