



cuna.org

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December 20, 2011

Federal Housing Finance Agency (FHFA)
1700 G Street, NW
4th Floor
Washington, DC 20552

Re: Comments regarding "Alternative Mortgage Servicing Compensation Discussion Paper"

Dear Sir or Madam,

The Credit Union National Association (CUNA) appreciates the opportunity to comment on the Federal Housing Finance Agency's (FHFA) "Alternative Mortgage Servicing Compensation Discussion Paper" (Discussion Paper). By way of background, CUNA is the nation's largest credit union trade organization, representing approximately 90 percent of our nation's 7,300 state and federal credit unions, which serve approximately 92 million members.

We would like to ask FHFA to extend the period for comment on its Discussion Paper for a minimum of one month. Financial institutions and their trade associations are currently working as expediently as possible to gather comments and draft comments in response to various proposals from numerous agencies.

Since FHFA's Discussion Paper is not subject to the requirements of the Administrative Procedures Act, extending the comment period would give commenters sufficient time to formulate suitable responses without the constraints posed by the holidays.

We thank you for your consideration in this matter. If you have any questions, please feel free to contact CUNA's Senior Vice President and Deputy General Counsel Mary Dunn or me at (202) 508-6776.

Sincerely,

Kristina A. Del Vecchio
Counsel for Special Projects



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