WISCONSIN BANKERS ASSOCIATION

July 9, 2009

VIA EMAIL

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW.,
Washington, DC 20551
regs.comments@federalreserve.gov
Docket No. R-1357

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW.,
Washington, DC 20552
regs.comments@ots.treas.gov
OTS-2009-0004

Ms. Mary Rupp, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428
regcomments@ncua.gov
RIN 3133-AD59

Office of the Comptroller of the Currency
250 E. Street S.W.
Mail Stop 2-3
Washington, D.C. 20219
regs.comments@occ.treas.gov
OCC-2009-005

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429
Comments@FDIC.gov
RIN 3064-AD43

Gary K. Van Meter, Deputy Director
Office of Regulatory Policy
Farm Credit Administration
1501 Farm Credit Drive
McLean, VA 22102-5090
reg-comm@fca.gov
RIN 3052-AC52

RE: Proposed Rules to Implement the S.A.F.E Mortgage Licensing Act: Docket No. R-1357; OTS-2009-0004; RIN 3133-AD59; OCC-2009-0005; RIN 3064-AD43; and RIN 3052-AC52

Dear Sirs and Madams:

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing approximately 300 state and nationally chartered banks, savings and loan associations and savings banks located in communities throughout the state. WBA appreciates the opportunity to comment on the interagency proposed rules to implement the S.A.F.E. Mortgage Licensing Act (S.A.F.E. Act).

The WBA respectfully requests the Agencies clarify the applicability of sec. ____.105(b)(3), possibly through use of examples. Providing a non-exclusive list of examples will assist mortgage loan originators in better understanding when a communication is specifically for his or her customers.

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WBA appreciates the opportunity to comment on this issue.

Sincerely,

Kristine Cleven
Assistant Vice President-Legal