

October 17, 2017

Ms. Monica Jackson
Office of the Executive Secretary
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552

Re: Mortgage Servicing Rules under TILA (Regulation Z);
Docket No. CFPB–2017–0030

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Consumer Financial Protection Bureau's (CFPB or Bureau) proposed rulemaking on the mortgage servicing rules under the Truth in Lending Act (TILA), implemented by Regulation Z.

In August 2016, the Bureau amended the 2013 mortgage rules under the Real Estate Settlement Procedures Act (Regulation X) and the Truth in Lending Act (Regulation Z) (referred to as the 2016 Servicing Rule). The 2016 Servicing Rule addresses Regulation Z's periodic statement and coupon book requirements for borrowers in bankruptcy. HCUA supports the proposed change to replace the single-billing-cycle exemption with a single-statement exemption. We believe this change would provide a clearer and more straightforward standard than the timing requirement adopted in the 2016 Servicing Rule, offering greater certainty for implementation and compliance, without unnecessarily disadvantaging consumers.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,



Brad Douglas
President/CEO