



MORTGAGE BANKERS ASSOCIATION

February 4, 2020

The Honorable Jay Clayton
Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

RE: Asset-Level Disclosure Requirements for Residential Mortgage-Backed Securities¹

Dear Chairman Clayton:

The Mortgage Bankers Association (MBA)² thanks you for the opportunity to provide input on the Securities and Exchange Commission's (SEC) asset-level disclosure requirements for residential mortgage-backed securities (RMBS). MBA is providing this interim response to serve as both an update on our forthcoming comments and a commitment to our ongoing support for reforms that can lead to a more vibrant RMBS market.

The development of a sustainable non-agency RMBS market has been a long-standing MBA priority. The lack of mortgage securitization outside the Ginnie Mae and Government-Sponsored Enterprise channels in recent years has led to an outsized reliance on government support for housing finance. Indeed, the request for input acknowledged that no SEC-registered RMBS offerings have taken place since the SEC revised its disclosure requirements in 2014. Reintroducing a critical source of private capital will add much-needed diversity to the housing finance system and increase aggregate liquidity, benefiting borrowers, lenders, issuers, and investors. MBA was therefore pleased to see your statement directing SEC staff to "review...RMBS asset-level disclosure requirements with an eye toward facilitating SEC-registered offerings."

¹ SEC, "Asset-Level Disclosure Requirements for Residential Mortgage-Backed Securities," October 30, 2019. Available at: <https://www.sec.gov/news/public-statement/clayton-rmbs-asset-disclosure>.

² The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry, an industry that employs more than 280,000 people in virtually every community in the country. Headquartered in Washington, DC, the association works to ensure the continued strength of the nation's residential and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans. MBA promotes fair and ethical lending practices and fosters professional excellence among real estate finance employees through a wide range of educational programs and a variety of publications. Its membership of over 2,300 companies includes all elements of real estate finance: mortgage companies, mortgage brokers, commercial banks, thrifts, REITs, Wall Street conduits, life insurance companies, credit unions, and others in the mortgage lending field. For additional information, visit MBA's website: www.mba.org.

In the time since the release of this statement, MBA has coordinated with other leading industry trade associations, and we are collectively in the process of completing a detailed and thorough response. The members of this coalition of associations represent market participants with deep knowledge of, and expertise in, mortgage securitization. As such, the forthcoming response will include not only broad commentary on ways to improve the SEC's RMBS disclosure requirements, but also feedback on specific data fields and definitions. While these more granular recommendations will take some further time to compile, we believe they can serve as a productive starting point for future collaboration between the SEC and all relevant stakeholders. Significant progress has been made over the last few months and we will work to finalize and submit these recommendations as soon as possible.

MBA thanks you for the opportunity to comment and is confident that efforts to revise the SEC's RMBS disclosure requirements are a valuable – and necessary – step toward reviving the non-agency mortgage securitization market. We look forward to a continued partnership with the SEC in these efforts. Should you have questions or wish to discuss further, please contact Sasha Hewlett, Director of Secondary and Capital Markets, at (202) 557-2805 and shewlett@mba.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Mills". The signature is fluid and cursive, with a large initial "P" and "M".

Pete Mills
Senior Vice President
Residential Policy and Member Engagement
Mortgage Bankers Association