

August 1, 2011

Robert E. Feldman, Executive Secretary  
*Attention:* RIN 7100-AD70  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW.  
Washington, DC 20429

Alfred M. Pollard, General Counsel  
*Attention:* Comments/RIN 2590-AA43  
Federal Housing Finance Agency  
Fourth Floor, 1700 G Street, N.W.  
Washington, DC 20552

Elizabeth M. Murphy, Secretary  
*Attention:* File No. S7-14-11  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549-1090

Jennifer J. Johnson, Secretary  
*Attention:* Docket No. R-1411  
Board of Governors of the Federal Reserve System  
20th Street and Constitution Avenue, N.W.  
Washington, DC 20551

Regulations Division, Office of General Counsel  
*Attention:* Docket No. FR-5504-P-01  
Department of Housing and Urban Development  
451 7th Street, S.W., Room 10276  
Washington, DC 20410-0500

Office of the Comptroller of the Currency  
*Attention:* Docket No. OCC-2011-0002  
250 E Street, S.W.  
Mail Stop 2-3  
Washington, DC 20219

**Re: Credit Risk Retention**

Ladies and Gentlemen:

I appreciate the opportunity to submit this letter of comment on the proposed rule to implement the credit risk retention requirements of Section 941 of the Dodd-Frank Act (the “Proposed Rule”) on behalf of PlainsCapital Corporation. As Chairman and Chief Executive Officer of PlainsCapital Corporation, I wish to express our wholehearted agreement with the attached letter of comment submitted to you on July 13, 2011, by PrimeLending President and CEO Todd Salmans.

Founded in 1987, PlainsCapital Corporation is an independent Texas bank holding company and diversified financial services company. The Corporation employs approximately 2,900 people in 280 locations across 38 states and the District of Columbia and is comprised primarily of three separate operating businesses: PlainsCapital Bank, FirstSouthwest, and PrimeLending.

With \$5.3 billion in assets and 34 branches across Texas, PlainsCapital Bank is the financial and strategic foundation of this family of companies, providing personal and commercial banking and lending services to businesses and individuals across the state.

PrimeLending, a wholly-owned subsidiary of PlainsCapital Bank, provides residential mortgage loans to borrowers in all 50 states and the District of Columbia, and according to MortgageDataWeb.com, PrimeLending is currently the 13th largest retail loan originator in the United States based on 2010 originations.

As a bank holding company which is regulated by the Federal Reserve System, PlainsCapital Corporation has deep concerns about the effect the Proposed Rule would have on PlainsCapital Bank and its ability to provide loans to qualified borrowers in Texas. As a general practice, PlainsCapital Bank does not provide residential mortgage loans and, instead, refers customers in need of a mortgage to a local PrimeLending office.

We remain cognizant of our obligations under the Community Reinvestment Act to meet the needs of borrowers in all segments of our communities, including low- and moderate-income neighborhoods. PrimeLending, as a wholly owned subsidiary of PlainsCapital Bank, provides residential mortgage loans to borrowers in all segments of the communities the companies serve jointly in Texas. This presence allows PlainsCapital Bank to reach more communities and thus help with the lending requirements under the Community Reinvestment Act.

We are extremely concerned about the impact the proposed definition of a Qualified Residential Mortgage (QRM) would have on PrimeLending's ability to continue to make loans to all segments of our communities, including low- and moderate-income borrowers. We agree with PrimeLending's assertion that the Proposed Rule's overly narrow definition of QRM will result in large numbers of qualified borrowers being unable to obtain a mortgage loan. We support PrimeLending's holistic approach to underwriting, which evaluates factors such as debt-to-income ratios, minimum down payment and loan-to-value ratios in concert with each other to determine a borrower's creditworthiness.

PlainsCapital Corporation strongly encourages the agencies to consider broadening the definition of QRM to help ensure that millions of qualified borrowers in all segments of our population would not be unfairly denied a home mortgage loan. Thank you for your consideration.

Sincerely,



Alan B. White  
Chairman and CEO  
PlainsCapital Corporation