GBA

GEORGIA BANKERS ASSOCIATION

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June 9, 2011

Mr. John G. Walsh, Acting Comptroller
Office of the Comptroller of the Currency
250 E Street, SW
Mail Stop 2-3
Washington, DC 20219

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Mr. Robert E. Feldman, Executive Secretary
Attn: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Mr. Alfred M. Pollard, General Counsel
Attn: Comments/RIN 2590-AA43
Federal Housing Finance Agency
Fourth Floor
1700 G Street, NW
Washington, DC 20552

Regulations Division, Office of General Counsel
U.S. Department of Housing & Urban Development
451 7th Street, SW
Room 10276
Washington, DC 20410

Ms. Elizabeth M. Murphy, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Ladies and Gentlemen:

On behalf of more than 275 commercial banks and thrift institutions throughout Georgia, I write in regard to the proposed rule on credit risk retention requirements as added by section 941 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Our membership is particularly concerned with the proposed exemption for "qualified residential mortgages" (QRM) from the five percent risk retention of assets collateralizing asset-backed securities.

We appreciated very much Congress' including an exemption of QRMs and believe that the proposal put forth by your six agencies is a more narrow approach than intended that will impact homeownership access for many if left as is. To be specific, the proposed 20% down payment and limits on a borrower's debt-to-income ratio could unnecessarily prevent otherwise well underwritten loans from being approved. We urge your reconsideration of these parameters so that our member banks are in a better position to make mortgage loans to qualified, hard working customers.

Thank you for your consideration of our comments.

Sincerely,

Joe Brannen

Joe Brannen
President & CEO