



OCTOBER 2012 BCG TELEPHONE BRIEFING

BCG MONTHLY TELEPHONE BRIEFING

Friday, October 19, 2012

12:00 pm-1:30 pm

(with live Q&A)

ALDRICH BONNEFIN & MOORE, PLC

Counsel to Bankers' Compliance Group®

Proposed Mortgage Servicing Amendments to Regulation X

As part of its flurry of proposed rules issued in August 2012, the Consumer Financial Protection Bureau (CFPB) issued a proposal that would amend Regulation X (RESPA) to implement six of the nine major amendments which impose new mortgage servicing requirements mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act. 77 FR 57200. These six new mortgage servicing requirements cover: (i) force placing hazard insurance; (ii) error resolution and information requests; (iii) information management policies and procedures; (iv) early intervention with delinquent borrowers; (v) continuity of contact with delinquent borrowers; and (vi) loss mitigation procedures. For example, under the proposal, servicers would be prohibited from force placing hazard insurance unless there is a reasonable basis to believe the borrower has failed to maintain property insurance and charging the borrower for force-placed insurance unless certain conditions are met.

Proposed Mortgage Servicing Amendments to Regulation Z

In order to implement the remaining three amendments which impose mortgage servicing requirements, the CFPB has also proposed to amend certain provisions of Regulation Z (TILA). 77 FR 57318. Specifically, the proposal would implement certain amendments to the Truth in Lending Act that address: (i) initial rate adjustment notices for adjustable-rate mortgages (ARMs); (ii) periodic statements for residential mortgage loans; and (iii) prompt crediting of mortgage payments and responding to payoff requests. The proposal would also amend current rules governing the scope, timing, content and format of current disclosures given to consumers when the interest rate adjusts on an existing ARM loan. According to the CFPB, these changes will significantly improve disclosures to make it easier for consumers to monitor their mortgage loans.

The CFPB expects to finalize both proposals by January 2013. Please join us for a detailed discussion of the proposed servicing amendments under Regulations X and Z at the Bankers' Compliance Group's October Monthly Telephone Briefing.

OCTOBER MONTHLY TELEPHONE BRIEFING

Aldrich Bonnefin & Moore, PLC is hosting a monthly telephone briefing for Bankers' Compliance Group members. The meeting will be on **Friday, October 19, 2012**. This meeting will be presented live and will include two question and answer sessions. Members can ask questions by telephone, fax or e-mail. Each member that registers for the monthly telephone briefing will be given a password, which will allow them to participate in the telephone briefing.

Organize Your Participants

This announcement is sent to our main contacts in order to encourage the institution to organize multiple attendees to participate at one location or several locations concurrently. In this manner, several attendees can be accommodated in one conference room with a speakerphone.

Download Handouts

For convenience, members can go to the BCG website, **www.bankerscompliancegroup.com**, and easily download this month's handouts. An instruction sheet for the briefing will be emailed if a member registers for the briefing.

Not Able to Listen to the Program? Log on to Our Website!

Should you or others at your institution miss the broadcast, you can tune into our streaming audio available on the BCG website. There will also be a package available which includes a CD of the meeting and the handouts. The package is available upon request at no additional cost. Contact Laura Jagerman at 800-742-3600 or **LJagerman@ABMLawFirm.com** to request this package.

REGISTER ONLINE ANNUALLY AT:

<http://register.bankerscompliancegroup.com/subadmin/>