



November 8, 2021

Lopa Kolluri, Principal Deputy Assistant Secretary for Housing
Julienne Joseph, Deputy Assistant Secretary for Single Family Housing
Office of Housing / Federal Housing Administration
Department of Housing and Urban Development
451 7th Street SW
Washington, D.C. 20410-8000

**RE: Request for Extension of Comment Period for Appendix 8.0 – FHA
Defect Taxonomy of the Single Family Housing Policy Handbook 4000.1
(Handbook 4000.1)**

Ms. Kolluri and Ms. Joseph:

The Mortgage Bankers Association (MBA) and the Housing Policy Council (HPC) appreciate FHA publishing updates to Appendix 8.0 – FHA Defect Taxonomy to include Servicing Loan Reviews on its “Drafting Table” for review and comment. A servicing defect taxonomy will provide greater transparency into FHA’s servicing review process and help servicers better understand how they will be held accountable for loan-level compliance.

In light of the impacts of the COVID-19 pandemic and the importance of the servicing defect taxonomy to our members, MBA and HPC request a 60-day extension to the December 27, 2021 comment deadline. Our members are inundated with managing and mitigating borrower impacts of the pandemic while implementing previous FHA handbook changes. This extension will allow us, and our members, to better assess the proposed servicing defect taxonomy section in a comprehensive manner and to provide more appropriate feedback on its impacts.

MBA and HPC welcome the opportunity to provide feedback on Appendix 8.0 and we believe it important for stakeholders to have the time they need to respond in a comprehensive manner. We support FHA’s commitment to provide clear and articulate guidance as it relates to servicing FHA loans, and we appreciate the opportunity to participate in that process. We look forward to continuing this dialogue.

Sincerely,

Mortgage Bankers Association
Housing Policy Council