

**From:** Niemi, Bob <[bniemi@bradley.com](mailto:bniemi@bradley.com)>  
**Sent:** Monday, August 26, 2019 7:42 AM  
**To:** Fazio, Lucinda (DFI) <[Lucinda.Fazio@dfi.wa.gov](mailto:Lucinda.Fazio@dfi.wa.gov)>  
**Subject:** Rulemaking filed recently

Checking to see on the recent filing and potential impact on commutable distance requirement for MLO's. I do not see where that the existing interpretation has been modified. Recently I have spoken to Charlie about that after his House testimony on virtual offices and thought the position might change.

The requirement that all origination work must be done from a licensed location is not practical for today's online and app based mortgage world. Not trying to be a pain, but hoping there is more in work for our clients. I understand the challenges of working within a state code as a former regulator, and not sure what your abilities are on this subject, but the mobile origination market will continue to grow.

Please let me know the Department's direction on this, if any.

Thank you for any insights you may be able to provide.

Bob

**Bob Niemi, CMB®**  
Senior Advisor, Financial Services  
e: [bniemi@bradley.com](mailto:bniemi@bradley.com) w: bradley.com  
c: 614.565.5901 o: 704.338.6019  
Bradley Arant Boult Cummings LLP  
Hearst Tower, 214 North Tryon Street, Suite 3700  
Charlotte, NC 28202-1078