

I appreciate the effort to update the MBPA and CLA rules. As lending has changed significantly in the last decade and NMLS has become a standard system in reporting and regulating our industry, it is important that DFI rules recognize these changes and react accordingly.

WAC 208-660-195 Technology has changed everything and as Zillow, RedFin and Quicken etc. along with many more lenders or one stop platforms becoming available it is important to recognize that we must also be available to borrowers at all times possible - regardless of where we are standing at the moment. Every measure should be taken with respect to security and electronic storage, but nearly anything is possible from anywhere and borrowers are no longer willing to wait until morning to get an answer.

WAC 208-660-520 and RCW 19.146.235: Having been through my second DFI investigation earlier this year, I feel that the time spent investigating violations or complaints rather than going through a complete investigation every 4 years serves all concerned better. I do feel new companies need to have investigations but companies like mine that have scored a 1 more than once should not have to go through as thorough an investigation. As a small business, these investigations are a great burden. If the focus on future investigations were for discovered violations or complaints it would give us back the time to serve our borrowers and give DFI to focus on where the problems are. This is an example of how we can work together to benefit the consumers and each other. Perhaps a reduced inspection with more focus on education on the more common issues you come across as well as providing suggestions for solutions to these issues. This could even be an open dialog. Your newsletters are very helpful but I am certain they get lost on some. Regardless, these should be consistent. NMLS came after these rules and all of the reporting we do already should weigh more heavily with the focus being more toward complaints or violations.

WAC 208-660-430 Disclosure requirements concerning reissuing rate lock disclosures. It seems unless there is a change to the lock terms, there is no need to redisclose this form over and over. All of the information is available on the LE now, including any fees involved.

Thank you for your consideration. Together, I believe we can make this process better.

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