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Indiana League Comment Letter - Interagency Credit Risk Retention Proposal

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Re: Interagency Credit Risk Retention Proposal

Dear Agencies Representatives: Indiana Credit Union League (ICUL) appreciates the opportunity to comment on the inter agency proposed rule on credit risk retention, which was required by the Dodd-Frank Act. The ICUL member credit unions represent over 98% of assets and members of Indiana's credit unions, with those memberships totaling more than two million consumers.

The ICUL supports the efforts to develop regulations that will result in a strong secondary market for real estate loans. We encourage all regulatory agencies to work to ensure that the end result is a secondary market available to all size lenders and their varying loan volumes. We also recognize the need for effective oversight of the secondary market and participating lenders to ensure the secondary market will operate efficiently and accomplish the goal of supporting the needs of borrowers, investors and securitizers.