



July 31, 2017

Office of Housing and Regulatory Policy
Federal Housing Finance Agency
400 7th Street, S.W., 9th Floor
Washington, DC 20219

To Whom It May Concern:

Re: Request for Input: Improving Language Access in Mortgage Lending and Servicing

Alaska USA Federal Credit Union (Alaska USA) appreciates the opportunity to comment on the Federal Housing Finance Agency's (FHFA) Request for Input regarding the challenges faced by borrowers with Limited English Proficiency (LEP).

Alaska USA is a federally chartered credit union with \$6.9 billion in assets, serving over 625,000 members throughout the United States. Alaska USA and its subsidiary, Alaska USA Mortgage Company, originates over \$1 billion in home mortgages per year for its members.

Alaska USA commends the FHFA for its commitment to identifying language barriers faced by LEP borrowers, and the search for solutions to overcome challenges associated with their understanding of the processes involved with mortgage origination and servicing.

Mortgage origination and servicing processes are very complex and can prove to be overwhelming, even for English speaking borrowers. Documents and verbal translations from English into foreign languages may not offer LEP borrowers the same level of understanding that is provided to English speaking borrowers, and complex information can be difficult to translate effectively. Moreover, some mortgage terms may not be easily translated, causing the translation to be ambiguous and open to interpretation, thus exposing lenders to liabilities under the Equal Credit Opportunity Act, and potentially creating issues around federal and state Unfair and Deceptive Acts and Practices rules.

Furthermore, as a federally chartered credit union, Alaska USA requires all mortgage borrowers to become members of the credit union. If our mortgage and real estate business line were required to provide translated marketing materials and documents or provide access to extensive translation services, Alaska USA would have to do the same across all marketing materials, disclosures, and client-facing documents, as well as in-service delivery through branches, call centers, ATMs and online. If an individual obtained a mortgage loan with translated documents, but then did not understand their account or disclosures or the cross-sell of other products, Alaska USA could be at risk; a risk that would be magnified by the number of languages spoken throughout Alaska USA's service areas.

Due to the inherent risks involved with complex translations and the potential consequences to mortgage lenders that provide other financial services, Alaska USA urges the FHFA to take more time to work closely with lenders and other market participants to identify, develop, revise, and implement policies that will better serve qualified borrowers with LEP, while not exposing lenders to any unnecessary risk.

Thank you for the opportunity to comment on this proposal. Please contact me at s.larson@alaskausa.org or (907) 375-3948 if you have questions.

Sincerely,



Steven Larson
Executive Director,
Mortgage and Real Estate Lending