Sept. 17, 2020

The Honorable Kathleen L. Kraninger
Bureau of Consumer Financial Protection
1700 G Street, NW, Washington, DC 20552

RE: Yom Kippur Filing Deadline for Seasoned QM Loan Definition
Docket No. CFPB-2020-0028, RIN 3170-AA98,

Dear Director Kraninger:

We are writing to ask for a one-week extension of the comment period on the QM seasoning comments. The comment deadline for the proposed special QM definition for seasoned loans falls on September 28th, Yom Kippur, the holiest day on the Jewish calendar, beginning the evening before on the 27th. Certain members of our staff will not be able to work at all on the comments during those times, which will pose a significant strain on the team. In addition, Rosh Hashanah begins this Friday evening, September 18th, and continues for most of the weekend, further cutting into our collective ability to work on the comments over this period.

As a matter of respect for the observance of these important religious holidays, we urge the Bureau to extend the comment period for one week, or at least for several days, to allow for proper completion of the work while meeting the staff’s religious obligations.

Thank you for your consideration.

Sincerely,

Richard Dubois
Executive Director