

IBANYS Correspondence sent to NYS DFS Senior Officials

Subject: Fwd: S. 8243-C A. 10351-B

To DFS:

This email (and one to follow) provide amendments to bill S.8243.

The next email will provide side by side comparisons.

These amendments seem to put DFS right in the middle of determining safety and soundness of state-chartered institutions during this process.

Also, there is no decision on escrow payments - it looks as though bank is responsible for taxes and insurance, all late fees, in addition to forbearing P&I, during this time of forbearance.

Let me know your thoughts. It seems very complicated and very one sided.

Community banks have been unbelievably supportive of their customers and communities during this process.

Would like to know your comments....

Thank you.

John