

External Suggestions	
1	Allow one time modification for the reduction of P&I constant, resulting from a large principal paydown. This would mirror existing procedures in place for the GSEs. FHA does allow this, but mandates a pre-approval.
2	ARM date changes should be provided on the GinnieNET schedule (print-out). This would be a tremendous help to the issuer community and would enable it to more efficiently track and monitor loan level compliance activity.
3	The annual requirements for renewal of Forms 11720, 1709, etc. are both inconvenient and unnecessary. It would be preferable if Ginnie Mae were to send out an annual report with all the pertinent information listed in its system, and ask the issuer to confirm or amend that document.
4	Can Ginnie Mae send out e-mail alerts when it posts a notice on its website under the "What's New Section"? It would be very helpful for issuers on the compliance side to stay updated with changes to the programs.
5	Issuers would like to see more reporting via the web: balances, quarterly submissions, all annual renewal forms, etc.
6	Ginnie Mae should review its loan level requirements relating to the reporting of FHA case numbers. There is a conflict in how the numbers are reported to FHA for monthly premium remittances, which causes manual work for those loans in Ginnie Mae pools.
7	Restructure FHA's MIP requirements to reward and retain performing borrowers.
8	Improve product innovation to compete with the conventional mortgage market in serving the needs of low income borrowers.
9	Improve liquidity and pricing of Ginnie Mae MBS through greater disclosure of collateral and performance information about the mortgages backing Ginnie Mae pools.
10	Consider ways to create bonds with legal finals of 10 years or less through the REMIC program.
11	Three business days prior to settlement, issuers would like to receive a database-readable file that contains pool number, cusip, coupon and final balance. Issuers could then cross check these coupons and final balances based upon pool number, and load the information into their systems. Currently, issuers must download this information from Bloomberg.
12	The subprime loan market has grown significantly over the past few years, and continues to grow this year at a rate of 26.9%, to \$887 billion. As this market continues to mature, the need for consistent, reliable and trusted liquidity will be critical to this market segment. Issuers suggest the development of a Ginnie Mae wrap program for subprime loans, and would welcome the opportunity to discuss specifics of various structures. It is understood that statutory obstacles may need to be overcome; however, these efforts will be beneficial to issuers, Ginnie Mae and homeowners.
13	Reporting Systems: One aspect of Ginnie Mae that adds a fair level of complexity is the multiple reporting systems and methods used to transmit data to Ginnie. It would simplify the process if Ginnie were to utilize a single system for all of its reporting requirements, similar to Fannie and Freddie.
14	Program Upgrades: It would be helpful if Ginnie would provide advance notice of program upgrades, changes to reporting requirements and Ginnie Mae training opportunities. In recent reporting cycles, recent upgrades to the Web IIS system resulted in rejected records or errors. In some cases reporting formats or information used for years in importing data for the 11710A's were no longer in line with the data requirements for Web IIS. Also, it is essential that issuers be given a reasonable window of time in which to comply with changes to data requirements.
15	IIS Error Reports for 11710A: Currently, E24error reports are very cumbersome to read and work with. Any efforts to make them more user-friendly would be appreciated.

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16	Pre-Collection Notices: It would be beneficial if the pre-collection notices from Ginnie Mae were available electronically, and formatted in Excel, so that any variances could be more easily identified.
17	G-Fees: Currently the guaranty fees are reported as one total amount. It would be helpful to have pool-level detail, perhaps as another column on the pre-collection notice.
18	Zero balance confirmation: There are currently three methods used to confirm zero balance accounts: telephone inquiry, fax inquiry and mailgram inquiry. The mailgram is redundant, as often times it is received days after the fax inquiry is returned, and thus prompts another unnecessary verification of the same information.
19	Quarterly bank certifications: Currently due on the 10th of March, June, Sept and December. Would it be possible to change the due date to the 15th or later, as it currently falls on the same due date as check remittances, 11710A, 11710E, 11710D transmissions, and, in some instances, with the due date for the 11714 Remittance report.
20	Decrease the minimum Ginnie Mae security size from \$250,000 to \$100,000 to accommodate smaller Section 8 mark-to-market loans.
21	Training on GinnieNET has been difficult to obtain and it would be helpful to have more training available. In addition, having an up-to-date user guide online would be helpful, as well. Issuers have been unable to obtain a current user guide from GinnieNET.
22	Shorten the time to process and deliver a permanent security from 4 days to 2 days, and a security for a construction loan to permanent loan conversion from 7 days to 5 days.
23	Monthly P & I pre-collection notices from Ginnie Mae should be in electronic, not paper, format.
24	Can something be done to permit changes to the resolution of board of directors and certificate of authorized signatures, HUD Form 11702, to permit the document to be executed in electronic format rather than in hard copy?
25	Ginnie Mae should provide more automation and electronic control through GinnieNET for the purpose of the master agreements, similar to HUD's FHA Connection. The latter is manipulated through an "applications coordinator," which serves as the gatekeeper of system access and authority.
26	Ginnie Mae should automate commitment authority and pool number requests, as well as transfers of issuer responsibility, to allow payment through PAY.GOV.
27	GinnieNET is limited to dial up connection and requires the use of a signature pad to "digitally" sign the transmissions prior to sending. Both present technical and cost issues. Proposal: go to an internet-based version with a more business preferred security and 'digital signing'.
28	Ginnie Mae should furnish more detail of the issuer's servicing portfolio in the feedback report. These reports should include breakdowns for Ginnie Mae I and II, types of loans with interest rates including fixed rate, adjustable rate, buy-downs, refinancings, loss mitigation, etc.
29	Ginnie Mae should eliminate the minimum three loan requirement per pool.
30	Has Ginnie Mae given any thought to purchasing whole loans? For issuers with smaller volume, securitization can be cost prohibitive.
31	FHA loan limits are significantly below the average home price in the Pacific Northwest and Hawaii, given current appreciation rates. This has severely restricted the number of FHA loans done in this area. Borrowers are doing cashout refi(s) and eliminating FHA and PMI all together.
32	FHA should have a zero downpayment mortgage product. Now, the sub-prime market is capturing the FHA market and the products are not as good. Can Ginnie Mae work with FHA to explore whether FHA can endorse sub-prime loans, or offer a similarly competitive FHA loan product?

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33	Exempt Ginnie Mae securities from state taxes. By doing so, the price of the securities would be bid up in the market place and permit lenders to offer lower rates on the FHA loans, possibly increasing the volume of activity.
34	HUD Form 1731, Prospectus for Ginnie Mae I Construction to Permanent Loan Securities, is not in fillable format. Could Ginnie Mae provide a fillable form template on its website?
35	When opening a "NEW" report for the latest reporting month, the pool numbers from the previous reporting month should be carried over to populate the new month's pool number fields. This would reduce data entry and thus, the number of errors that must later be corrected. The program has a built in error check for the pool number fields. The person doing the data entry should have the option of changing the pool number or tabbing through the pool number field. This would also speed data entry.
36	100% financing. Zero down is vital.
37	The Multifamily prospectus forms have not been provided in "fillable" format. This would truly help Issuers as we are manually typing these out for investors.
38	Can Ginnie Mae add the 11711A to the GinnieNET program?
39	Can the GinnieNET error report specifically identify the form that must be corrected for the specific error? Currently, the explanations given are not clear.
40	Ginnie Mae does not have a reliable system to update new pool faxes.
41	RE: Matured Pool Process: Issuers would prefer to eliminate the requirement that security holders must return the original physical certificate in order to receive their final payment. Ginnie Mae should allow all checks to be sent to security holders regardless of maturity and receipt of original certificate.
42	Ginnie Mae Verification Sheets: Issuers propose the following process: (1) Instead of validating security balances before the RPB's are due, complete the verification after the RPB's are sent. This could cut down on some of the exceptions that are produced on the 3rd and 4th business day. (2) Reduce the initial RPB transmission deadline by 1 day to the end of the 4th business day. (3) Once the RPB transmission is sent on the 4th business day, allow servicers to download the exceptions from a designated website. The exceptions would need to be researched and any corrected RPB's would need to be transmitted by the end of the 5th business day.
43	I would suggest that Ginnie Mae be more specific with their initial certification requirements and include MECA requirements in the MBS Guide. Issuers would then be able to refer to the Guide and not have to ask the custodian for clarification. It seems that it just comes down to the custodian's interpretation and not what Ginnie Mae actually requires. As an issuer, we would prefer not to leave it to custodial interpretation.
44	Ginnie Mae and FHA should increase their coordination efforts to respond to market developments and provide the best overall product for low and moderate-income borrowers.
45	Ginnie Mae should continue with its disclosure improvements and study the benefits of identification of downpayment assistance loans in Ginnie Mae MBS pools.
46	Ginnie Mae should review its pooling parameters for ARMs to optimize pooling flexibility and value.
47	Ginnie Mae needs greater flexibility to recruit, manage and compensate employees in order to keep pace with the changing financial landscape, and provide the best opportunities for homeownership to low-and moderate-income borrowers.
48	Ginnie Mae should send out Issuer Detail Reports electronically.
49	Ginnie Mae has too many different contractors doing too many things on different systems. Can some of the reporting be consolidated into fewer systems?
50	Ginnie Mae should cap the dollar amount of fidelity bond coverage, based on its own loan exposure.

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51	Why do the carriers have to have an AM Best rating of B+ or better? Couldn't Ginnie Mae still allow a less than "B+" rated insurer to participate if the overall exposure were still B+ or better?
52	RE: The required electronic signature for files transmitted via GinnieNET, such as the 11710D and 11714. Many times it takes dozens of signature attempts before one is recognized as 'valid' by the system. Can Ginnie Mae get rid of the signature requirement and make the system user specific, like WEB IIS / IEDS?
53	RE: The SSCRA reimbursement requests and eligibility requests. Having to both transmit the information and send hard copy is redundant. Can it be all one way or the other?
54	Can Ginnie Mae abolish the Western Union Mailgrams? By the 3 rd business day issuers have already received faxes from Ginnie Mae about any pools that need confirmation. The mailgram is overkill.
55	Some issuers have discontinued the receipt of the monthly cartridge of security holder changes from Ginnie Mae, for a few reasons. The first is that the cartridge format is too costly for the little information it contained. The second is that their systems are migrating away from the cartridge format. They have reverted to relying on receipt of the hard copy transfer advice to effect any changes. This is a step backwards. Is there an alternative means of obtaining the necessary security holder change information, such as retrieving and uploading the information to issuer systems? Further, is there a way to confirm that no security holder changes occurred for a given month? Right now, issuers assume that no changes have occurred by virtue of <i>not</i> receiving a transfer advice. They would feel more comfortable receiving a statement to that effect than not receiving anything.
56	Issuers must access the WEB IEDS system to review loan level exceptions. Some issuers determined, during the audit process, that social security number reporting is one area that is tracked by Ginnie Mae, yet servicers, are unable to see any exceptions related to this area. It would be helpful to know discrepancies of this nature so we can rectify any problems.
57	Re: Ginnie Mae II multiple monthly drafts. Issuers have inquired several times over the last several years about the ability to have the drafts for Ginnie Mae II drafted as a lump sum transaction. This change would be most welcome as issuers are charged per draft by our bank
58	When issuers resolve unclaimed funds issues with Ginnie Mae, they often receive paper checks. Issuers would prefer to receive a wire transfer for the lump sum, and an email with the line item detail.
59	<p>The process that is in place for the addition as well as deletion for the authorized signors for GinnieNET purposes is extremely cumbersome.</p> <p>From what I understand, the HUD form 11702 should include those Officers of the organization that are authorized to sign on behalf of the issuer. From what I understand, this should include only management or above.</p> <p>Subsequently, when submitting a form for GinnieNET access, the form should be authorized by a signer on the 11702, but not everyone requested as a user for GinnieNET has to be present on the 11702.</p> <p>This issue extends to the request for access for the e-access module for Ginniemae.gov. When reading the enrollment guidelines, it specifically states that the form should be executed and approved by an officer of the company that appears on the 11702. Does this mean that the same guidelines apply for GinnieNET purposes?</p>

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60	Freddie recently announced that there would be no fee for the creation of "Giants" over \$500mm. This is clearly a positive for the Gold program, and has met with cheers from both the investor base and the dealer community. Can Ginnie Mae do something similar?
61	Reword the Hud form 11702 to permit Ginnie Mae-approved branch offices to execute the document without certifying that the resolution was presented to, and adopted by, the Board of Directors at a duly called meeting.
Internal Suggestions	
1	Eliminate Treasury form PD 1832 as a Ginnie Mae security transfer vehicle. Instead, allow only the HUD version of the Detached Form for Certificate Title Transfer (Appendix IV-3).
2	Eliminate physical certificates; allow book entry only.
3	Eliminate SS # from 11714 advices to thwart identity theft.
4	Provide MWX Report (Issuer Detail) to issuer community in electronic format to facilitate pool reconciliations.
5	11710E "Other" category should be eliminated. Loan liquidations should be identified by numerical code. Payoffs should be one code, repurchases another, etc.
6	GinnieNET Bulletin Board at sign-on would provide information to the issuer community in a timely fashion, without requiring them to access multiple systems.
7	Create similar file formats with FHA to facilitate information transfers.
8	Automate Multi-Family prepayment penalties on GinnieNET to ensure that both the final payment and the prepayment penalty are both passed through to the investor.
9	Provide MBS Guide in CD format for all New Issuer Application Packets.
10	Issuer cut-off dates must be hard-coded to ensure appropriate pass throughs.
11	MERS loan reconciliation would provide increased data integrity to issuers, Ginnie Mae and to MERS.
12	Provide an "At-A-Glance" checklist of necessary documents on the Ginnie Mae website for new issuer and new document custodian applicants.