



January 24, 2017

Fannie Mae (Headquarters)
3900 Wisconsin Avenue, NW
Washington, DC 20016

To whom it may concern:

The National Association of Mortgage Field Services (NAMFS) is the leading and largest trade association in the Mortgage Field Services Industry. Our membership includes national, regional and local field service providers along with ancillary industry businesses.

With the recent addition of Clearboarding to the Fannie Mae (FNMA) requirements and associated cost schedule and requirements, NAMFS has fielded a significant number of concerns about the successful implementation of this product and service. Two prime variables are access/supply and the cost calculations that are very different than the previous boarding standard. NAMFS has partnered with members of our organization to review the guidelines and the price schedule. These conversations have expanded to suppliers and standard cost estimator companies. NAMFS is respectfully asking FNMA to review and consider the below recommendations that would ensure a full implementation of the quality service that FNMA expects across the industry when the grace period ends.

1. Clearboarding Material- Currently, the FNMA Servicing Guide provides an allowable for Clearboarding, but does not indicate any specific requirements for material, thickness or installation method. After the review of NAMFS and its members, it is recommended that Clearboarding be defined as a polycarbonate clear sheet with a minimum thickness of 3/16". We have thoroughly tested this thickness in the field and are convinced it meets expectations for security and durability. We are happy to provide a sample for your review. It is also the recommendation of NAMFS that traditional cross member materials (2x4, u-channel) be acceptable when not using a proprietary systems solution (i.e. Secureview or InvisiBoard)
2. Securing Timeframes- As the clearboarding material must be specially ordered, NAMFS recommends that FNMA allow a servicer to claim reimbursement for temporary boarding on openings with plywood in instances when a window cannot be secured with Clearboarding upon discovery of the opening. This is predicated on the current challenges with ready access to the material in all parts of the country. In time, with increased supply outlets and equitable costs, this situation should diminish.

3. After thorough review and research, NAMFS recommends that the current allowables be increased due to additional costs incurred with the use of Clearboarding. The recommended increase in pricing is to increase each window allowable by \$90 to allow for the cost of the base material, additional materials for installation, shipping, labor, overhead and profit.
 - a. Clearboarding Sheets- The current pricing available for a 48"x96" sheet of polycarbonate ranges from \$110 to \$420 per sheet depending on the supplier. This pricing is ONLY for the base material and does not include any costs associated with the shipping of the material or installation. Enclosed are price schedules from 6 suppliers throughout the country that may be utilized based on availability of the product.
 - b. Additional Material- In addition to the base polycarbonate sheet, the window will require the purchase of carriage bolts, washers, nuts and the cutting mechanism to cut the sheet down to the correct size.
 - c. Shipping- If a property is not in a vicinity of a distribution center, materials must be ordered. Research has shown shipping will cost anywhere from \$75-\$808 depending on what distributor is used, location of the contractor and the number of sheets ordered.
 - d. Labor (assuming 2 people aiding in installation)- This material is not as rigid as plywood and for most openings would require multiple individuals to install. The use of this material requires specific tools for cutting which adds cost. The material increases the time to install by approximately 10 minutes per window during initial time studies.
 - e. Overhead and Profit

Please find the enclosed documentation outlining the current pricing structure for windows boarded using clearboarding and its increased pricing structure.

We sincerely appreciate Fannie Mae entertaining our concerns. Please know that the industry fully supports the efforts to transition away from a plywood solution to a solution such as clear boarding which is imminently better for vacant and abandoned properties and the neighborhoods in which they are found. We look forward to your feedback and would certainly be open to continued dialogue on this matter.

Sincerely,

Eric S. Miller

Executive Director-NAMFS

The NAMFS Officers
The NAMFS Board of Directors