

All of the proposed regulations at §682.208(j) represent a shift in burden from borrowers to loan holders. Under current regulations, borrowers are required to submit a written request for their loan holder to apply the SCRA interest rate limit and a copy of his or her military orders to support the request. Because, under the proposed regulations, borrowers will no longer be required to submit a written request or a copy of his or her military orders, the burden on borrowers will be eliminated in its entirety.

While borrowers will still be permitted to submit other evidence that they qualify for the SCRA interest rate limit, and loan holders will be required to honor it, the Department has no data to suggest the extent to which erroneous or missing data in the U.S. Department of Defense's DMDC would give rise to a borrower needing to submit alternative evidence of his or her military service, but anecdotal accounts suggest that the error rate of the DMDC is of a de minimis nature. Therefore, the proposed regulations would eliminate all but 20 hours of burden on and estimated 141 borrowers and 141 responses that are associated with the current regulation.

TOTALS

Responses	141
Respondents	141
Burden Hours	20