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Ms Karen Chandler
Mr. Raymond M. Wenger
Division of Agent & Agency Services
Florida Department of Financial Services
200 East Gaines Street
Tallahassee, Florida 32399-0320

Dear Ms. Chandler and Mr. Wenger:

As you are aware, the Florida Land Title Association (FLTA) is a trade organization which represents thousands of title agents, title underwriters, and their employees doing business in the State of Florida. As the newly installed Chair of the FLTA's Agent's Section, I would like to thank you both for supporting an open dialogue with Florida's title industry.

FLTA recently concluded its annual convention in Bonita Springs. Florida's seventeen major title underwriters and more than one-hundred agents were in attendance. A major topic of discussion was House Bill 111 and the Department of Financial Services, Informational Memorandum, DFS-12-2007, issued October 1, 2007. During our Agents Section Committee Meeting it came to light that agents and underwriters across the State differ in their interpretation of HB-111. There are clearly inconsistencies in the allocation of fees among agents on the HUD-1 Settlement Statement. As such, we are requesting a more detailed clarification by the DFS to ensure that all agencies are compliant. I am respectfully submitting the four major areas of concern:

1. The possible difference between DFS interpretations and requirements under the Real Estate Settlement Procedures Act (RESPA);
2. Different interpretations from OIR for insurers than for agents from DFS;
3. The analysis by DFS that HB 111 limited the labeling on the settlement statement to only four areas: closing fee, premium, title search, endorsements.
4. Inclusion of the Closing Fee in federal Truth-In-Lending calculations.