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July 22, 2021

VIA ELECTRONIC MAIL

Commissioner of Financial Protection and Innovation
Attn: Colleen Monahan, Senior Counsel, Legal Division
2101 Arena Boulevard
Sacramento, CA 95834
regulations@dfpi.ca.gov
colleen.monahan@dfpi.ca.gov

RE: *Response to Invitation for Comments on Proposed Regulations*
PRO 02/17 Applications and Filings through NMLS

Dear Ms. Monahan:

This is in response to the Department's Fifth Notice of Modification to Proposed Regulations under the California Financing Law, PRO 02/17, relating to the NMLS transition.

The proposed regulations do not require existing licensees transitioning to NMLS to re-submit certain documentation already in the possession of the Department. However, there is no suggested way to determine what documentation may already be in the Department's possession. Given that many licensees originally submitted their documentation for licensure many years ago, it may be unclear what documentation is already in the Department's possession.

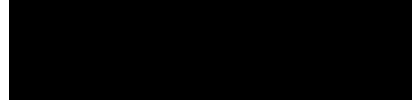
To ease the transition for existing licensees, we suggest a modification to the regulation to state that licensing will not be suspended or denied without notice to the licensee of any missing documentation and an opportunity to submit it.

We also suggest that the Department provide guidance on its website as to the Department's preferred way for a licensee to obtain a copy of its own previously submitted documents that are in the Department's possession.

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We appreciate this opportunity to provide feedback on the proposed regulations.

Sincerely,



Rebecca Coll