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April 25, 2008

Loyd Ogle, Director
Title Guaranty
Iowa Finance Authority
2015 Grand Avenue
DesMoines, Iowa 50312

Re: proposed administrative rule change(s) re title plant waivers

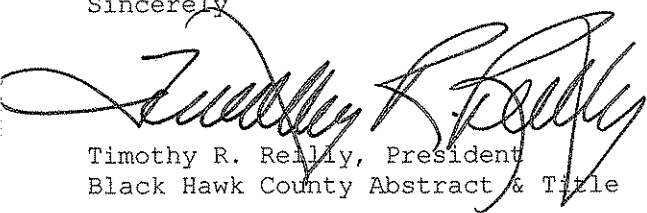
To: Loyd Ogle

Black Hawk County Abstract & Title (BHCA&T) is submitting this comment on proposed administrative rule change of Chapt. 9 as it relates to title plant waivers. BHCA&T feels there should be provision for a permanent waiver that would be available to current traditional title plant abstracters for county(ies) other than that in which it maintains a current title plant. This additional permanent waiver could be both product/service(s) and geographically specific (i.e.: adjacent XYZ county(ies) for TG900/901 purposes only).

More and more BHCA&T has been finding itself at a competitive disadvantage by not being able to offer title related services to its lender clients in counties other than its home county (i.e.: Black Hawk). Over the past few years BHCA&T has experienced an increase in inquiries from lenders, realtors and lawyers about providing title services in these other counties. These inquiries for the most part are based upon service issues.

If there were a provision for such a waiver BHCA&T would be interested in obtaining one for counties in its immediate vicinity. BHCA&T feels that with its experienced and seasoned staff, it could perform such title evidencing in a complete and accurate manner.

Sincerely


Timothy R. Reilly, President
Black Hawk County Abstract & Title

IFA-04/28/08-AM093021