

TILA-RESPA Integrated Disclosures: Estimated number of affected entities and small entities by NAICS code and engagement in closed-end mortgage transactions

Category	NAICS	Small entity Threshold	Total entities	Small entities	Entities engaged in closed-end mortgage transactions	Small entities engaged in closed-end mortgage transactions
Commercial banks & savings institutions ^a	522110, 522120	\$500,000,000 assets	7435	6080	7230	5913
Credit unions ^b	522130	\$500,000,000 assets	7240	6845	4178	3784
Mortgage companies (Non-bank creditors) ^c	522292	\$35,500,000 revenues	2787	2672	2787	2672
Mortgage brokers ^d	522310	\$7,000,000 revenues	24,792	19,267	24,792	19,267
Settlement agents ^e	541191	\$10,000,000 revenues	8261	8131	8261	8131

a. Asset size obtained from December 2011 Call Report data as compiled by SNL Financial. Savings institutions include thrifts, savings banks, mutual banks, and similar institutions. Estimated number of creditors originating any closed-end mortgages is based on 2011 HMDA data and, for entities that do not report to HMDA, loan counts are projected based on Call Report data and counts for HMDA filers.

b. Asset size and engagement in closed-end mortgage loans was obtained from December 2011 National Credit Union Administration Call Report. Count of credit unions engaged in closed-end mortgage transactions may include some institutions that make only first-lien, open-end loans.

c. Total number of entities and small entities was estimated based on the NMLS Mortgage Call Report (MCR) data for 2011. Entities that report to MCR are considered to be engaged in closed-end mortgage transactions if they report either: (1) originating or brokering at least one closed-end mortgage; or (2) a positive dollar value of originated or brokered loans. The estimated number of small entities is based on predicting the likelihood that an entity's revenue is less than the \$35.5 million threshold based on the dollar value and number of loans originated and the dollar value and number of loans brokered.

d. Total number of entities and small entities estimated based on 2007 Economic Census data. Number of entities under SBA threshold includes all entities under \$7,000,000 in revenue, due to the level of aggregation of public use data from the Economic Census. All entities are assumed to engage in closed-end mortgage transactions.

e. Total number of entities and small entities estimated based on 2007 Economic Census data. All entities are assumed to engage in closed-end mortgage transactions.