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March 24, 2011

The Honorable Elijah E. Cummings
Ranking Member
Committee on Oversight and Government Reform
United States House of Representatives
2157 Rayburn House Office Building
Washington, D.C. 20515-6143

Dear Congressman Cummings:

This is in response to your letter of February 25, 2011, in which you requested documents and information from MetLife, Inc. concerning certain foreclosure policies, procedures and practices. MetLife, Inc. is not a mortgage loan servicing company and it does not engage in mortgage loan servicing. MetLife Bank, N.A. (the "Bank") is a wholly-owned subsidiary of MetLife, Inc. The Bank engages in a residential mortgage loan servicing business. Accordingly, our response is limited to the activities of the Bank.

To assist the Committee in its work, we are first providing you with an overview of the Bank's mortgage servicing business. We will then respond to your individual numbered requests.

By way of background, the Bank is a relatively new entrant into the mortgage servicing business. The Bank acquired the servicing platform and hired the servicing personnel of First Tennessee Bank, N.A. in September 2008. The Bank has approximately a 1.1% market share among residential mortgage servicers in the United States, with a portfolio (serviced and sub-serviced) of approximately 569,000 loans of which more than 85% is agency servicing (e.g., Fannie Mae, Freddie Mac and Ginnie Mae). Only about 1% of the loans in the Bank's servicing portfolio are loans owned by the Bank. Neither the Bank nor its affiliates engaged in a subprime lending business, and thus the Bank does not have a legacy servicing portfolio of negatively amortizing loans and hybrid adjustable rate mortgage loans that it made, acquired or securitized.

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Despite its short tenure as a servicer, the Bank consistently has received high servicing quality ratings from its major investors and the Department of Housing and Urban Development (HUD). In 2010, Freddie Mac rated the Bank a Tier 1 Servicer. Since it entered the mortgage servicing business, the Bank consistently has earned a Tier 1 Loss Mitigation ranking from HUD. In November 2010, Fannie Mae ranked the Bank 2nd among the Bank's peer group of servicers for loan workouts (including loan modifications) completed with seriously delinquent borrowers and provided the Bank positive ratings in all qualitative servicing categories in the Fannie Mae Asset Performance Review process.

We will speak to each of your numbered requests in order below.

1. *Internal investigations and audits.* We undertake internal investigations and audits for the purpose of assessing our own compliance with both our contractual requirements to the investor or insurer under servicing agreements and applicable law. Our quality control and internal audit functions are an important self-assessment tool and cover a broad range of servicing topics beyond default servicing. We consider the results of these reviews to be highly confidential and, in some cases, privileged, documents. Requiring their production would have a chilling effect on a company's efforts to self-police its compliance with applicable requirements. Accordingly, we respectfully decline to produce these highly confidential, internal documents.

In addition, the Acting Comptroller of the Currency has testified to Congress that the Office of the Comptroller of the Currency (the "OCC") has conducted "horizontal" reviews of the default servicing operations of several national banks, including the Bank. The OCC has directed the Bank to maintain the confidentiality of those reviews. We fully cooperated with the information requests of the OCC, and we consider those responses and the related work product to be confidential as well.

2. *Communications with customers and others in which MetLife determined that foreclosures were not properly executed.* Communications with our customers are subject to financial privacy laws, including Gramm-Leach-Bliley and similar state laws. Consequently, we are unable to provide copies of those communications without the borrower's consent except to our banking regulator or subject to a subpoena. In the horizontal review, the OCC did review borrower communications related to foreclosure activities on a sample basis. However, in an effort to provide responsive information, the Bank undertook a review of written complaint letters as outlined in more detail in response to request No. 4 and is providing the results of that review below.

3. *Communications with customers and others relating to instances in which MetLife determined that improper fees in excess of \$5,000 per household were charged to homeowners.*

Communications with our customers are subject to financial privacy laws, including Gramm-Leach-Bliley and similar state laws. Consequently, we are unable to provide copies of those communications without the borrower's consent except to our banking regulator or subject to a subpoena. In the horizontal review, the OCC did review borrower communications related

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to foreclosure activities on a sample basis. However, in an effort to provide responsive information, the Bank undertook a review of written complaint letters, as outlined in more detail in response to request No. 5 and is providing the results of that review. In addition, the Bank conducted an electronic search of its records and is providing a summary of that information below.

4. *Total number of complaints received by MetLife alleging that foreclosures were not properly executed.* While the Bank reviews and responds to the customer complaints that it receives, it does not track complaint letters by this level of detail. Communications with our customers are not collected and maintained in a readily retrievable form in any one place in the Bank, making a search for all customer communications very burdensome. However, in an effort to provide information in response to this request, the Bank reviewed a sampling of written complaint letters received during the months of January 2011 through March 2011 to determine if the complaint letters included such an allegation. In addition to this time period, the Bank reviewed written complaint letters received in the month of November 2010 (after industry-wide media reports concerning alleged foreclosure practices), as well as written complaint letters received in the month of June 2010 (prior to industry-wide media reports concerning alleged foreclosure practices) for comparison. Approximately 611 written complaint letters were reviewed in connection with all three of these time periods. Of the letters reviewed for the months of January 2011 through March 2011, approximately 48 written complaint letters included some allegations of improper foreclosure, including allegations that a foreclosure should not have been initiated. Of the complaint letters reviewed for the months of November and June, approximately 46 letters in November and 19 letters in June, included some allegation of improper foreclosure including allegations that a foreclosure should not have been initiated. We note that we are including in these counts letters in which the allegation related to the fact that (i) a loan modification was denied, or (ii) the modification process became stalled or delayed so that foreclosure appeared unavoidable at the time the complaint was made, as well as letters for which the Bank may have determined that the allegation lacked merit or was not supported by the underlying facts.

5. *Total number of complaints received by MetLife alleging that fees in excess of \$5,000 per household were improperly charged to homeowners.* As set forth above, the Bank reviews and responds to the customer complaints that it receives, but it does not track complaint letters by this level of detail. Communications with our customers are not collected and maintained in a readily retrievable form in any one place in the Bank, making a search for all customer communications very burdensome. However, in an effort to provide information in response to this request, the Bank reviewed a sampling of written complaint letters received during the months of January 2011 through March 2011 to determine if the complaint letters included such an allegation. In addition to this time period, the Bank reviewed written complaint letters received in the month of November 2010 (after industry-wide media reports concerning alleged foreclosure practices) as well as written complaint letters received in the month of June 2010 (prior to industry-wide media reports concerning alleged foreclosure practices) for comparison.

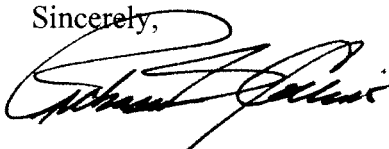
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Approximately 611 written complaint letters were reviewed in connection with all three of these time periods. Of the letters reviewed for the months of January 2011 through March 2011, none of the letters included allegations of improperly charged fees in excess of \$5,000. Of the letters reviewed for the months of November and June, one letter was received in November and one letter was received in June which included some allegation of improperly charged fees in excess of \$5,000. In addition to this review, the Bank undertook an electronic search of its records for any fees charged in excess of \$5,000 and specifically, instances where such fees were reversed or waived during the life of the loan. The Bank could identify 28 instances where it assessed \$5,000.00 or more in fees to a customer's account during the life of the loan in which the Bank subsequently reversed or reclassified the charges. 22 of the 28 instances involved complying with investor and mortgage insurer requirements and did not impact the customer in any way. In each remaining instance, the fees assessed to the customer's account were identified and waived before any complaint was received by the customer. In none of these instances did a customer actually pay the fees.

It has been and will continue to be a primary goal of the Bank to work with our customers to keep homeowners in their homes and to be vigilant in ensuring that any fees charged to our borrowers are appropriate. We hope that the information we have provided today is helpful to the Committee as it exercises its important oversight function. If you have any questions about the information provided, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard S. Collins", written over a white background.

Richard S. Collins

cc: The Honorable Darrell E. Issa, Chairman