



MORTGAGE BANKERS ASSOCIATION

December 12, 2025

The Honorable William J. Pulte
Director
Federal Housing Finance Agency
400 7th Street, SW
Washington, DC 20219

RE: Affordability - Removing Tri-Merge Credit Report Mandate

Dear Director Pulte,

The Mortgage Bankers Association¹ (MBA) applauds your ongoing efforts to improve our nation's housing system and make homeownership possible for all qualified Americans who seek it. Your decision to move forward with the implementation of VantageScore 4.0 in July brought competition to credit scoring. Recent news of your agreement with FICO on the terms and conditions of their historical FICO 10T data was another welcome announcement, showing real progress towards a modernized credit scoring regime that better reflects the financial health of today's consumers and expands access to homeownership for more creditworthy Americans.

The persistent lack of competition in the credit reporting market continues to raise costs for prospective homebuyers and borrowers seeking to refinance. Despite the introduction of new credit score models and updated offerings from both FICO and the credit bureaus, our members are facing another significant increase in credit reporting costs for 2026 of 40% to 50% on average. This will be the fourth consecutive year of dramatic price increases for the GSE-required "tri-merge" product, which has dramatically raised the costs that lenders and borrowers pay for credit reports. Burdening the mortgage system with these costs — unconstrained by any market competition — has exacerbated ongoing housing affordability challenges.

The current GSE requirement to obtain a report from each of the three credit reporting agencies creates a situation where there is no competition between bureaus for the product.

¹ The Mortgage Bankers Association (MBA) is the national association representing the real estate finance industry, an industry that employs more than 275,000 people in virtually every community in the country. Headquartered in Washington, D.C., the association works to ensure the continued strength of the nation's residential and commercial real estate markets, to expand homeownership, and to extend access to affordable housing to all Americans. MBA promotes fair and ethical lending practices and fosters professional excellence among real estate finance employees through a wide range of educational programs and a variety of publications. Its membership of more than 2,000 companies includes all elements of real estate finance: independent mortgage banks, mortgage brokers, commercial banks, thrifts, REITs, Wall Street conduits, life insurance companies, credit unions, and others in the mortgage lending field. For additional information, visit MBA's website: www.mba.org.

Predictably, a market with only three providers, and a mandate to purchase a report from all three, subjects the industry to price increases with no available alternative or countervailing price pressures. Lenders must cover these costs for all applicants, even on loans that do not close, and pass them on to borrowers as part of the origination process, adding hundreds of dollars to borrowers' closing costs.

We are strong supporters of this Administration's welcome focus on pursuing all avenues to improve housing affordability. Given the recent exorbitant price hikes, removing the current tri-merge framework must be a part of the Administration's affordability initiatives. MBA stands ready to work with FHFA and the GSEs to implement a credit reporting framework that uses a single credit report for borrowers with a credit score above a specified threshold. MBA members have reviewed their own data and found narrow variances in tradeline coverage and credit scores on borrowers with credit scores of 700 and above. Based on these assessments, we believe that a tri-merge requirement for borrowers with scores of 700 and above adds costs but little additional value in risk prediction.

We strongly urge you to end the requirement for a tri-merge credit report for every loan purchased by Fannie Mae and Freddie Mac and instead allow lenders the option to rely on a single credit report if the initial report has a credit score of 700 or above. A single report for borrowers with good credit would encourage competition among the bureaus to improve accuracy and lower costs. Single-file reports are safely used in virtually every other consumer finance market, such as home equity, auto, and unsecured consumer lending. Allowing a single-file option in the conventional mortgage market, with appropriate guardrails, will spur competition, improve service, and lower costs for borrowers.

We support bold action that rethinks the status quo to make it more affordable to access the security and stability provided by sustainable homeownership. Introducing credit report competition by eliminating the tri-merge is just such a step. Thank you for your ongoing efforts to modernize credit scoring and enhance our housing system. We look forward to working with FHFA and the GSEs to establish a credit reporting system that works for today's housing market and provides much needed relief to America's consumers.

Sincerely,



Robert D. Broeksmit, CMB
President and Chief Executive Officer
Mortgage Bankers Association