



LandAmerica Tax and Flood Services, Inc.
1123 South Park View Drive
Covina, CA 91724

February 27, 2008

Subject: OCC Bulletin 2008-4, Flood Hazard Determination Practices

The Office of the Comptroller of the Currency (OCC) has identified two concerns regarding certain practices relating to flood hazard determinations that may expose national banks to compliance and operational risks. We want to assure you that LandAmerica is in full compliance with the OCC's recommendations. Here are the OCC concerns and recommendations, and how LandAmerica complies with the OCC requirements:

1. Use of the Community Status Book: The OCC discovered that some companies that provide flood determinations to national banks are not using the Community Status Book (CSB) when obtaining community status information for their flood determinations. Instead, these entities rely solely on the information available through the Flood Map Status Information Service (FMSIS), the Federal Emergency Management Agency's (FEMA) electronic flood database that is provided to subscribers on a monthly basis. FEMA has indicated that the CSB is the final authority for community status information.

LandAmerica Tax and Flood uses the FEMA Community Status Book (CSB) as the final authority for determining the participation status of a community. Each month, after the FMSIS database is received, a comparison of the FMSIS database to the internal LATF map information database is conducted. Each discrepancy is reviewed and verified against the FEMA Community Status Book (CSB). FEMA is contacted when discrepancies cannot be resolved.

2. The OCC also discovered that some flood determination companies do not note on the Standard Flood Hazard Determination Form that they have revised or updated the determination. The OCC recommends that flood determination companies and national banks indicate any dates of revision in the "comments" section of the Standard Flood Hazard Determination Form, when a determination has been revised or updated.

Whenever LandAmerica Tax and Flood revises a flood determination certificate, we place the new determination date in the lower right hand corner of the form. Certificates revised by map revisions will reflect the new determination date in the lower right hand corner of the form, in addition, a summary report containing critical changes is provided.

LandAmerica is in full compliance with the OCC recommendations for flood determinations. If you have any questions about our flood determination procedures, please contact us.

Sincerely,

A handwritten signature in black ink that reads 'Cody Tillack'.

Cody Tillack
Executive Vice President and Chief Operating Officer