

December 3, 2020

William A. Newman
Chief Executive Officer
Home Point Capital Inc.
2211 Old Earhart Road, Suite 250
Ann Arbor, MI 48105

Inc.
Statement on Form S-1
6, 2020

Re: Home Point Capital
Draft Registration
Submitted November
CIK No. 0001830197

Dear Mr. Newman :

We have reviewed your draft registration statement and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting an amended draft registration statement or publicly filing your registration statement on EDGAR. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to these comments and your amended draft registration statement or filed registration statement, we may have additional comments.

Draft Registration Statement on Form S-1 Submitted November 6, 2020

Industry and Market Data, page iii

1. We note references to third-party information and industry research throughout the prospectus, beginning with your reference to Inside Mortgage Finance on page iii. Please advise us as to whether any of these reports were commissioned or prepared for this filing. If any of these reports were prepared for use in connection with this registration statement, please file a consent acknowledging the use of the information in the prospectus.

Company Overview, page 1

2. Please briefly explain the term Wholesale lender the first time you use it, in order to

William A. Newman
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Capital Inc.
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distinguish that business from other forms of mortgage origination. Clarify your disclosure that you are "the third largest wholesale lender by origination volume in 2020 through June 30" by explaining the relationship between the wholesale channel and other forms of residential loan origination. Also, please clarify the

distinction between your
wholesale channel and the overall wholesale channel.

3. Please substantiate that you are currently the third largest and
fastest growing wholesale
lender as of June 30, 2020.

4. We note statements throughout the summary regarding your plans and
expectations for
continued growth. Please discuss in greater detail any additional
funding needs you will
have to drive this growth, where you expect to source the funding, and
the time frame and
any material milestones.

5. Please provide support for the statement on page 16 that the wholesale
channel is
fragmented below the top three participants. Explain why you believe
that this creates
substantial opportunity to gain market share.

6. Please provide more detail regarding the reasons that you believe that
growth in the
company's platforms implies that they are scalable. Balance disclosure
regarding
scalability by referencing factors that would inhibit scalability,
such as the considerations
that appear in the risk factor on page 31.

Risk Factors, page 27

7. In the risk factor that discusses financing arrangements, please
disclose the number of
warehouse lenders on which your business relies, as well as the number
of funding
facilities that expire in 2021 and the terms of the uncommitted
facilities. Explain your
plans, if any, to replace the expiring facilities.

8. Please expand the risk factor on page 52 to state explicitly the risks
associated with a
falling interest rate environment. We note in this regard the
disclosure on page 75 of the
impact of changes in interest rates on your business.

Management's Discussion and Analysis of Financial Condition and Results of
Operations, page
73

9. Please expand your discussion of the proprietary Home Ownership
Platform to explain
how the platform differs from those of your competitors and what
aspects of the platform
cause increased customer retention. Quantify the impact of the
platform on customer
retention and disclose the time period over which such retention has
occurred.

10. Please disclose here the number of loans enrolled in forbearance plans
and the percentage
of loans in your total serving portfolio this represents. Please
continue to update this and
your related liquidity disclosure as of the most recent practicable
date.

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Business, page 91

11. Please discuss how your highly componentized, flexible technology
infrastructure allows
you to "leverage nimble internal development teams and market leading
third-party
systems to provide a best-in-class experience for our partners and
customers." To the
extent that you believe that this infrastructure distinguishes you from
your competitors,
explain why.

12. Please expand your discussion of your broker partners on page 95 to
explain the
relationship between those partners and the company, particularly whether
the company
retains any liability for the actions of the brokers.
Description of Capital Stock, page 130

13. Please clarify, here or in a risk factor, that the distribution of any of
the convertible
preferred stock the board will be authorized to issue could be dilutive

to stockholders.
Exclusive Forum, page 135

14. You state that the exclusive forum provision will not apply to claims under the federal securities law. Please confirm that this will be explicitly stated in your certificate of incorporation or, alternatively, tell us how you plan in future filings to make investors aware that the provision is not applicable to these claims.

General

15. Please provide us with copies of all written communications, as defined in Rule 405 under the Securities Act, that you, or anyone authorized to do so on your behalf, have presented or expect to present to potential investors in reliance on Section 5(d) of the Securities Act, whether or not you retained, or intend to retain, copies of those communications. Please contact Julia Griffith at 202-551-3267 to discuss how to submit the materials, if any, to us for our review.

You may contact William Schroeder at 202-551-3294 or Amit Pande at 202-551-3423 if you have questions regarding comments on the financial statements and related matters. Please contact Julia Griffith at 202-551-3267 or J. Nolan McWilliams at 202-551-3217 with any other questions.

FirstName LastNameWilliam A. Newman
Corporation Finance
Comapany NameHome Point Capital Inc.

Sincerely,

Division of

Office of Finance

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cc: Joe Kauffman
FirstName LastName