

From: First Mortgage Funding Group, Sherry A Ellis
Subject: Reg Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
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Name: Sherry A Ellis
Affiliation: First Mortgage Funding Group
Category of Affiliation: Commercial
Address:

City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

This proposal may sound good on paper but it is going to effectively cost the consumer much more money while putting the small business owner out of business. YSP is the only way we can offer competitive rates to the consumer while keeping their out of pocket costs at a minimum. We primarily work with first time buyers and most of the time, these borrowers do not have a lot of money to pay closing costs. With YSP, we are able to reduce the upfront costs and still offer competitive rates. Without YSP, we would have to increase our fees or charge additional "points" or "origination fees". This is not how we want to do business. This is going to eliminate an entire pool of borrowers who will no longer be able to come up with the additional costs that will be incurred. If we don't charge these fees, then we will be unable to keep our office open and bear the expenses of running our operation. I am all for proper disclosure to the consumer--been doing that since I started in the business in 1986. Taking away YSP, however, is not consumer-friendly and will do irreparable harm to this industry as a whole. Thank you.