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Subject: Reg Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages

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Comments:

This comment is intended to outline the drastic effect the new Reg Z legislation would have on thousands of mortgage clients throughout the country. No Cost Loans: This is an option that I give my clients to help them save money and reduce the break even timeline on the costs initiated to finance a transaction. This option is good for both Purchase Loans as well as Refinance Loans. The client can use this type of financing to reduce their monthly payments without having any risk in losing money to do so. It is also a very good option for people that do not know how long they plan on staying in a home. They can reduce their payments and interest expense on a refinance without any concern of losing money in the transaction. Low Cost Loans: This is just another way for me to use the Yield Spread to cut down on closing costs for my client. If they do not want the interest rate that corresponds with a No Cost Loan, they can chose a more aggressive option that will reduce their interest rate a little further and still not pay the total costs associated with a "normal" mortgage transaction. By eliminating Yield Spread, you are essentially eliminating two thirds of the options customers will have for mortgage financing. Everyone will be required to pay full closing costs on every transaction. The HVCC requirements have already proven that the cost of mortgage financing has gone up, do not force it to go up even further with the passage of this bill. If you would like any other information or documentation regarding this issue I can be reached at or on email at

Thank you Andy Shier President ASSET Lending Group, LLC