From: Homeowners Financial Group, Brant Smith

Subject: Reg Z - Truth in Lending

Comments:

Public Comments on Truth in Lending:======

Title: Truth in Lending FR Document Number: E9-18119 Legacy Document ID: RIN: null Publish Date: Wed Aug 26 00:00:00 EDT 2009 Submitter Info:

first_name Brant last_name Smith address1 city country United States us_state zip email company Homeowners Financial Group

I am writing in regard to section E, page 10. I have been a mortgage banker/broker for 11 years. With respect to LO "steering" and compensation, it has been my experience that LO''s wrote subprime loans to borrowers as the subprime market had very relaxed underwriting guidelines, not that they offered higher compensation. As an LO I could make the same amount of money selling prime or subprime loans, the difference was what the lender required for documentation. Based on what has happened over the last year subprime mortgage products are no longer being offered a result of these loans not performing. The market in my opinion is correcting itself.

I am for regulation that makes sense, along with loan officer licensing. Proposing flat fees and eliminating YSP and SRP is like reducing an airline pilots pay because his airplane wasn"t properly maintained.

Underwriting guidelines loosened up so much over the last decade that it reached a point where if you had a job you could borrow hudreds of thousands of dollars to buy a house. The answer I believe, is ensuring a borrower is capable of repaying a loan, not reducing loan officer compensation. We work hard for the job we do. Banks need appropriate measures to ensure they are writing loans to borrowers who are qualified to own a home.