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Proposal: 1417 (RIN 7100-AD75) Reg Z - Mortgage Repayment Standards
Subject: Reg. Z

Comments:

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Comments:

The Board, once again, is attempting to subjugate the industry with changes that have not been thoroughly studied nor thoroughly vetted. With the definitions of "qualified mortgage" and "qualified residential mortgage" still undetermined, the Board should seek further direction through examination and study BEFORE proposing sweeping change. The CFPB is tasked with the regulation of the mortgage industry, including Regs X and Z. Let the CFPB do its job. With the CFPB's changes and requests for input on a revision to the GFE, it is prudent to leave this entire proposal to the CFPB and strike down this proposed FRB Rule. The FRB has proven its trend for overreaching and this Rule is no exception. This subject requires further and exhaustive study before subjecting the industry to such severe and reaching rules. Let the CFPB handle changes to the mortgage lending industry from here on out. It is evident that the CFPB is generally more interested in public comment, collaborative efforts for improvement, and the general interest for the public and industry good. From the 4/2011 FRB Rule on originator compensation and the FRB's Hon. Braunstein's "misstatements" in her testimony last week to the House Subcommittee, it is clear to me that the FRB's intentions are less than honorable. When the FRB reviews the origination studies from four resources, the FRB hires the authors of the two studies proving that brokers are less expensive than lenders (especially in lending to minorities), yet presents a Rule that goes directly against your own employees' published studies, that is completely disingenuous. When your FRB representative testifies before a Congressional Subcommittee and lies when directly questioned by a Representative, the entire foundation of the FRB is untrustworthy. The entire matter at hand needs to be tabled and transferred to the CFPB for further study and analysis, and, only then, an unbiased review. The industry and consumers do not need to be harmed again by a headstrong FRB Rule that does not consider broader implications nor enough data and analysis to formally make a Rule. Please table this Rule and defer to the CFPB.