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Subject: Reg. Z

Comments:

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Comments:

I have become very concerned over the new consolidation of the departments such as HUD and RESPA and the possible regulations that will affect a property owner's ability to develop and provide financing for unimproved lots intended for residential use. As of date, the owner financing of these types of unimproved lots intended for a single family dwelling have not been regulated beyond the bounds and responsibilities of a Registered Mortgage Loan Originator. It is my understanding that in the case of an 'unimproved owner financed' lot intended for a single family dwelling the requirements and/or criteria as imposed by the SAFE ACT or Dodd-Frank regarding financial underwriting does not apply. If these requirements such as the buyers 'ability to pay' as prescribed by the Dodd-Frank Act which amends the Truth in Lending Act are promulgated in so far as to included unimproved lots the impact upon consumers, homebuilders and developers would be catastrophic. Owner financing is one of the last paths to credit for many consumers who don't fit the criteria as prescribed in the aforementioned legislation or as mandated by the banking industry. The key to the process of providing what is now considered 'unconventional financing' is the simplicity in which the buyer and seller can conduct a transaction. These lots are paid for on an installment basis allowing for the accumulation of equity which can provide financial stability to consumer in offering it as equity for the eventual financing of a new home or clear title to a piece of land accommodating a manufactured home. There are numerous other advantages which elude the 'one size fits all' frame work as being implemented by SAFE ACT and the Dodd-Frank ACT. I strongly urge and respectfully request the exclusion of owner financing of unimproved lots intended for use for single family dwellings in regards to the ability-to-repay underwriting requirements when offering seller financing consistent with the Dodd-Frank Act which amends the Truth in Lending Act. It should be noted that there is no Federal money that is used in developing these unimproved lots and the only one at risk is the seller that provides the financing. I appreciate this opportunity to state my position on this matter and look forward to assisting you with any questions you may have. Sincerely, Scot Campbell