

**From:** "Michael Aning" <mike@turnkeyms.com> on 04/08/2008 07:15:04 PM

**Subject:** Regulation Z

*I am a mortgage broker in San Jose, California and sending comments about Reg. Z and proposed changes.*

*I support consumer protection and do not see how singling out mortgage brokers is going to solve the problem that amendments to Reg. Z are expected to fix. Wouldn't the competitive spirit that provides the best terms available on the market be compromised if one party is not required to disclose compensation while another is forced to?*

*I think it is unfair that Mortgage Bankers or Large Banks are not required to disclose SRP build in on their warehouse lines nor any of the YSP. Shouldn't consumers know what a lender is making on thier business?*

*I believe in, and would support, standardized licensing or requirements for mortgage originators and further that this is the only way to gain the consumer protection that you are looking for. The process that applies to some people one way and another set of people another is flawed. As a professional, I educate myself in my field to be an expert in personal finances and build my business around customer loyalty. I find myself competing with an "Employee" at a large bank who is giving mortgage advice without any first hand knowledge of what the process is like.*

*You are kidding yourselves if you believe that a bank "Employee" who is paid on commission will not earn more YSP if they do not have to disclose nor the customer ever know.*

*The bigger problem is lack of oversight and education requirements required to provide the largest DEBT and largest ASSET. Horrible advice is equally provided by untrained brokers and bankers alike. Customers cannot tell the difference and most homeowners expect their loan to be sold in the furture to some bank they have never talked to. This does not convey security or protection from the borrowers point of view. That's why I get the calls before their banks do when my client have questions. They know I'll be here for them and that the personal attention I provide they cannot expect from a large institution.*

*If you are looking at eliminating "Smoke and Mirrors" tactics that is fine by me. Start with DITECH advertising on national TV that they are offering 5.375% 30 year fixed with Some APR and noting in the 2 second fine print that there are TWO DISCOUNT POINTS required to get that rate. I'm fine with disclosure to my clients and I do not spend millions of dollars presenting something in the best light hoping that people won't questions.*

*Also, how can I quote rates and fees without having vital information about the customer? The process is confusing enough.  
If you want to do something good, standardize the process across the board so consumers can expect the same information regardless who they speak to.*

*Additionally, I support and agree with the comments submitted by the CMPS Institute which can be found at:*

*<http://www.cmpsintitute.org/pdf/CMPSCommentsforFRB.pdf>*

*I would like to thank the Board of Governors of the Federal Reserve for considering my comments,*

*Respectfully,*

Michael Aning