

August 14, 2007

Ms. Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th and Constitution Ave NW
Washington DC 20551

RE: Docket No. OP 1288

Dear Ms. Johnson,

Westchester Residential Opportunities, Inc., (WRO) a not for profit organization whose mission is to promote equal, affordable and accessible housing opportunities for all residents of our region, and a member organization agrees with NCRC. We urge the Federal Reserve to expeditiously implement strong protections against abusive lending per the Federal Reserve's authority under the Home Ownership and Equity Protection Act (HOEPA). The State of New York along with millions of other homeowners are standing on the edge of a mortgage tsunami of massive foreclosures. In Westchester County, New York, we are averaging 50-60 foreclosures a week. By the end of 2007, we may reach an additional 3000 foreclosures!

Our Mortgage Default Department serves hundreds of homeowners annually, seeking restitution from foreclosure victims. The devastation wrought by predatory lending is frustrating because stronger federal regulation and legislation would have avoided much of the abusive lending and replaced the predatory lending with responsible prime and subprime loans. WRO supports the suggestions from NCRC regarding:

Steering Prohibition-FRB must declare that steering borrowers qualified for prime loans into subprime loans is an unfair and deceptive practice.

Lender Liability-FRB must hold lenders liable for deceptive and fraudulent practices committed by brokers with whom they do business. Lenders and brokers must face serious financial penalties if they intimidate or pressure appraisers to meet certain home values. Fraudulent appraisals have contributed significantly to the rise of delinquencies and defaults.

WRO suggests that we obtain comprehensive Congressional legislation on Predatory Lending activities and implement strong HOEPA reform.

Sincerely,

Veronica L. Raphael

Veronica L. Raphael
Foreclosure Prevention Specialist
cc: NCRC