

From: "creative lending" <creativelending@verizon.net> on 03/31/2008 12:35:02 PM

Subject: Regulation Z

03/31/08

To Whom It May Concern:

In regards to docket NO. R-1305 "proposed rule amending reg Z", I support most of the disclosures addressed but as a mortgage broker, feel criminalized by the proposal to restrict compensation for mortgage brokers. I have been in business for over 4 years and have zero complaints against my name and business name. Why are we being singled out as the only mortgage originator mandated to a disclosure overhaul? There is a place for mortgage brokers in this market. As an example, many banks will not underwrite "manual" FHA loans. I can find the lender a customer needs saving them time and effort that would be waited if they needed to shop around themselves. The transaction benefits both the lender and the customer and I have represented neither. This expedites the customer's needs and insures healthy competition. For that service, I receive compensation in the form of fees and yield spread.

The payments I receive cover costs associated with the loan (office overhead, licensing taxes and fees, appraisals, overnight fees, ect.) I have no problem disclosing how much I make to a client but to put the burden on only the mortgage broker and not the lenders originating deals is discrimination. Under this proposal, If a customer sees a yield spread premium on a disclosure and compares it with a lender's disclosure having nothing said about additional compensation it seems like the mortgage broker's deal costs more yet we could be providing a **less** costly loan in both fees and rate!

We are not the cause of the financial crisis that is happening right now. We could only fund loans that were approved by lenders under THEIR guidelines. If the governing body feels that the solution to future credit crunches is a disclosure issue, make these disclosures equal to all mortgage originators, not just brokers.

Thank you for considering these comments. I have faith in our system and hope The Board of Governors of the Federal Reserve can approve a sweeping measure that blankets ALL mortgage origination and not based on what kind of business is originating them.

Sincerely,

Michael Messineo
Mortgage Broker