

From: "Lynne Borden" <Lynne@paradigm mortgagecorp.com> on 04/01/2008 11:35:05 AM

Subject: Regulation Z

To Whom It May Concern:

My name is Lynne Borden from Palm Beach Gardens, Florida...

I am a mortgage broker and have been since 1987 in Florida. I also own my own company as a correspondent lender. I support the consumer protections act of the Federal Reserve Board's proposed amendments to Regulation Z BUT oppose the proposal to restrict compensation for mortgage brokers.

We have the ability to compare programs and rates with many lenders. I used to work for PNC Mortgage Company and many times had to turn borrowers away because PNC did not have all the programs and rates to help my borrowers. I can now do a rate comparison and give my borrowers the best terms available.

Some borrowers have limited cash and we are able to use some of our premium to help them buy their dream home. Some borrowers would rather take a higher rate with less closing costs. Others who might be in their home a long time elect to buy the rate down. Premium give us the ability to do this. I remember bank in the 70's and 80's where we had only one rate to give the borrower. Because of this we were not able to pay any of their closing costs. Do we really want to go back to that??

Upon loan application the borrower is asked if they want to lock in their loan or float it. It is explained to them at loan application that by not locking in the rate it could get worse - better or stay the same. Many time the borrower wants to play the game to see if we can get them a lower rate. If they elect to float we then estimate the premium we might get and put it on the GFE and Florida Lender Disclosure. Upon locking in the lock we now RE-DISCLOSE the rate and premium to the borrower within 3 days of the actually lock. It is impossible to be exact if the borrower themselves tells us NOT to lock in the rate.....

I believe it is unfair that loan originator's working for the BANK are not obligated to do the same. They advertise more or as much as we do- and on top of that most banks package their loans and sale them. **WHY ARE THE RULES DIFFERENT FOR THEM!!!!**

Most borrowers can not distinguish between brokers and lenders as we all have similar names, use similar signage and rely on similar advertising.

ALL loan originators and mortgage brokers should use the same disclosures. We should all be equal in our representation to the borrower. In the end we all help the borrowers buy their home.

Florida has been very aggressive in our disclosure's especially with the rate and

premium to the borrower. I believe that Florida has done a good job with this except for the fact that banks (loan originators) are exempt. Doing this nationally would be a great idea BUT again it should be uniform to include all loan originator and brokers even if they work for a bank.....!!!!!!!!!!!!!!

I hope that the FED consider alternatives to the proposed regulation that would protect the consumer and encourage competition on price and service. In other words be fair to ALL.

Thank you for considering by comments.

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