

From: "Valerie Seiwert" <v_seiwert@mail.com> on 04/04/2008 09:50:04 AM

Subject: Regulation Z

To Whom It May Concern:

These proposals are absurd. If this is truly the proposal, how can any Originator determine that the borrower has the ability to repay the mortgage for at least 7 years. We can only look at past history of a borrower and make a sound decision, but there is no way to predict any unforeseen occurrences in ones life that may show otherwise.

The additional changes should be looked at very closely before substantial rules are set in place.

- A new category of "higher-cost" loans, which will eliminate stated and no-doc loans under any circumstance.

.. New APR triggers of 3% (1st mortgages) and 5% (subordinate mortgages) above the 10-year U.S. Treasury, causing nearly every mortgage made in America to be classified as a "higher cost" loan. As such, the provisions of the Fed Rule will make financing nearly impossible.

.. A new disclosure for Mortgage Brokers only that will require you to disclose, before application, what your mortgage brokerage fee (front end AND back end fees) will be on the loan and this cannot change.

.. The Originator to determine that the borrower has the ability to repay the mortgage for at least 7 years.

Sincerely,

Valerie Seiwert, Mortgage Broker State of Florida