From: "Rob English" <robenglish@earthlink.net> on 04/04/2008 02:41:25 PM

Subject: Regulation Z

While I understand and support the spirit of the proposed amendments to Regulation Z, I have some practical issues with some of its components.

I believe that both banks and brokers should disclose yield spread premium to the consumer.
As I see it, full disclosure to the consumer only helps them to make a more informed decision.
Why would banks not be held to the same guidelines as brokers? Nowhere have I ever seen this addressed. I've worked on both sides of the business, as a banker and a broker. I understand the compensation structure of both - they are the same. You can call it YSP or SRP, they are both premiums paid to the originating institution. Spin doesn't change the facts.

Quoting exact compensation before application is absurd. The best that anyone can do is estimate.
I would support a tolerence threshhold of some sort. Pricing is in a constant state of flux, and most educated consumers float waiting for rates to dip. Can we quote ysp to the exact dollar amount without knowing where exactly pricing will be for a given rate? Of course not.
Additionally, there are so many variables that come into play during process - after an application is originated.
Allowable income, market value, overall credit profile... There are just too many examples to list.

I consider myself a very good originator and always work in the best interest of the client. I agree that work needs
to be done in this industry. I believe that **all** originators should be required to pass a difficult test. The test
administered by Illinois was a step in the right direction, but it was too easy.

We are dealing with peoples homes - I don't think passing an easy multiple choice test on the 3rd try is setting the
bar very high. I believe those originators working for banks should be required to pass the test as well.

Whatever the decision in the end, I hope we are all on an even playing field. Brokers serve the citizens in many good
ways. It seems all new legislation is geared to give an upper hand to the banks. I don't think that serves the best
interests of the public.

Thank You,

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