

From: "Lawrence Lee Sullivan, CFS, CLTC" <llsullivan@gmail.com> on 04/02/2008 05:25:02 PM

Subject: Regulation Z

Attn: Board of Governors - Federal Reserve System
Proposed Fed Rule - Reg Z - TILA

Docket No. R-1305

Dear Sirs:

I very much understand that early and understandable disclosures are the key element to consumer protection both under TILA and RESPA as well as other federal laws. A second key component is a reconciliation of those disclosures with the final product being delivered at closing.

I do take major exception to the proposed Rules requirement that (only) Mortgage Brokers and their Loan Originators must disclose, commit to and get borrower agreement to a total compensation amount for a transaction, before they can begin to accept an application.

Currently, Banks, S and Ls, credit unions, captive loan originators with finance companies, mortgage bankers, and all other originators are exempt from this requirement.

This unique requirement can be expected to distort consumer perceptions. The FTC has shown in earlier tests of an equal mortgage disclosures that the consumer frequently makes a bad choice. This is especially true when indirect compensation is treated as if it is a direct out of pocket cost.

If the board of governors truly desire to protect the consumers, then all loan originators need to be required to adhere to the same standards and disclosure practices.

Sincerely,

Lawrence Lee Sullivan, CFS, CLTC

Senior Partner, Express Home Loans, LLC

99-080 Kauhale St, C-19, Aiea, HI 96701

(808) 487-6509 (Office) (808) 487-6510 (Fax) (808) 255-9627 (Mobile)