

From: "gary" <gary@loansbyapex.com> on 04/02/2008 05:35:03 PM

Subject: Regulation Z

Dear Board of Governors,

My name is Gary Tomljenovich and I have been a licensed mortgage broker for 20 years, currently owning my own business. I would like to comment on the proposal that affects the disclosure of our yield spread premium.

First, I would like to know why we have to disclose the amount of money we get paid in the transaction. What business do you go to that tells you how much they are making for their services? The auto industry doesn't tell you, the last car I bought my dealer didn't tell me how much they made. It was up to me to negotiate the best deal I could. My grocer doesn't post how much his eggs are costing him before his markup, but I do have other stores in which I can buy eggs. I just had new counters installed in my home and I have no idea how much the materials are costing my contractor and what is his cost of labor. I did however shop until I felt I had made an informed decision. I thought we still operated in a free enterprise system. If I don't keep my fees and rates competitive I won't survive in this industry. How much is a gallon of gas costing Exxon these days?

Second, If the disclosure does go into effect I would hope you look at this as an industry matter and not a mortgage broker issue. This is an issue that should apply to all mortgage originators, banks, credit unions, mortgage lenders and brokers. To say the brokers have to disclose their compensation while not requiring the other institutions is an unfair trade practice. Banks are getting paid just like brokers and don't have to disclose any of their compensation they receive for their SRP. If one has to disclose, all should. Many banks and lenders are currently selling their loans to the same sources brokers are and they receive the same kind of compensation. If you really want to protect consumers, please look at this as an industry issue!

Thank you for considering my comments in your decision making process.

Gary Tomljenovich
Billings, Montana
406-259-0877