

The logo for Vision Mortgage Company, Ltd. features the word "Vision" in a large, elegant, cursive script. To the left of the "i" in "Vision" is a small icon of a house with a chimney. Below "Vision" is the text "Mortgage Company, Ltd." in a bold, sans-serif font.

Vision
Mortgage Company, Ltd.

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April 3, 2008

Board of Governors of the Federal Reserve System

RE: Docket No. R-1305

Dear Board of Governors:

I have been a mortgage broker in the San Antonio area since 1997 (*I have been in the mortgage business since 1979*). You may note that my license number is #90—there are thousands of brokers now.

I applaud your efforts in championing the cause of consumer protection but respectfully oppose the aforementioned proposal as written. I do not agree with the section that specifically restricts compensation to mortgage brokers.

The function of a mortgage broker is to act as a vehicle that takes the needs and interests of the consumer to a corresponding Lender set up in a free market environment to meet those needs. As a group we serve both parties but do not represent either of them.

Having come from a mortgage banking back ground, I am familiar with the role of the *big banks* and institutional Lenders. We compete against them daily. In my opinion, we likely never be on a level playing field (with respect to consumer disclosure and policy) --perhaps that is a good thing. Competition should motivate to self-police, to ensure that the consumer gets "*the best deal possible*", especially if the broker is in this business for the long haul.

I would support any action that is deemed to be in the best interest of consumer as long as the dissemination of this action is across the board. If all bankers, credit union loan officers, mortgage bankers, and mortgage brokers are required to disclose similar formatted information, the consumer can be assured a fair shake.

For years I have heard that brokers should unequivocally disclose yield spread. I do not particularly have issues with this...as long as it is required of all financial mortgage service companies. I am reminded of the mortgage banker "abuses" that existed in the

early '80's and actually continue to exist in the FHA 203K market. Mortgage bankers were "earning" 5-9 points on the origination of these rehab loans with the customer ultimately being faced to pay a higher rate. These "*yield spread*" abuses continue today as a normal mode of business in the FHA 203k market.

I would be glad to lend my personal support to any research team or committee exploring this issue with genuine interest. This is one broker you can call on and feel comfortable that you will get straight answers and authentic decisions.

I give you my sincere thanks for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Armando G. Barbosa', with a long horizontal line extending to the right.

Armando G. Barbosa
Broker/Owner
Vision Mortgage Company, Ltd.
Texas Broker Number #90