

From: "David Egerton" <degerton@1atmc.com> on 04/04/2008 08:45:02 AM

Subject: Regulation Z

Dear Sirs,

I am writing to add my comments to the above referenced Legislation.

Primarily, I have three concerns. First, the assumption of the bill is that all of the mortgage industry problems were created by the Mortgage Broker Community. How absolutely ridiculous an assumption! Are only Broker originated loans in default at this time? Are all of the loans originated by direct lenders such as Bank of America, Wells Fargo Chase and so on all performing and current today? Are all of the directly employed loan officers of these institutions angels?

Second, the new "yield spread disclosures" requirements...why only the brokers? Again, the directly employed loan officers of the large banks, etc... are they not compensated by the Bank in making the loans? Does this compensation not influence what loan programs to offer? What if lender "A" can not offer an appropriate loan program the borrower needs, but lender "B" or a Broker can, whose loses? The borrower, of course!

Finally, the timing of these "yield spread premium" disclosures is a real problem. We can not disclose this compensation during the pre-approval part of a home purchase transaction until we lock the loan. We may not lock a loan at the borrower's direction until just prior to closing! How do we disclose on this scenario? And again, why only include Brokers in this disclosure! Are the Bank employees working for free? Are they not incentivized by the lender to sell/push certain loan programs based on the Bank's cost of money?

I am all for an informed consumer choice but let's at least both be fair and honest in these disclosure requirements! Mortgage Origination problems are not the sole responsibility of brokers. There is plenty of blame to share by all parties in the home mortgage industry!!!!

Thank You,
David

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