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Subject: Reg Z - Truth in Lending

Comments:

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Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
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I have been in the mortgage industry for the past 25 years and after reviewing the new proposal R-1366 I believe ultimately it will not help the consumer. This proposal would lead to the Broker having to create an agreements with all the different Lenders thus creating potential steering issues based on which Lenders has the best compensation, not best terms. In order to enforce improper steering, law suits will be became popular which will increase the Brokers liability to the point where many, if not all Broker companies will be forced to close, thus leaving less competition and choices for the consumer. This proposal also will put an unfair burden on the Banks to do business with Brokers in their wholesale divisons, which in return will cause fewer choices for the consumer at higher prices. In closing, although the intent of this proposal is good, the the actual pracitice of this proposal will result in less choices and higher costs to the consumer