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Subject: Reg Z - Truth in Lending

Comments:

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Comments:

I believe that the goal of the proposed changes is to better serve the consumer and make sure that they receive the best possible product concerning their mortgage. YSP is one tool they we as brokers have to structure new proposals for the consumer. In some cases, receiving YSP from the lender is the only way to structure the new loan giving the particular situation. For example, there have been many cases in such that the borrower has an adjustable rate, interest-only loan. The equity/LTV, in most cases, is very tight due to the recent market conditions, and receiving YSP from the lender, while providing a broker credit to the borrower to help with the settlement charges, would be the only way to structure that particular deal. With these new proposed changes, we, as originators, may have to turn down the loan that would otherwise get put together. So in the end, that borrower would be forced to remain in that adjustable rate, interest-only loan, most likely won't be able to afford the higher payment, and be forced to foreclose. As I believe the intentions are very good, it will prevent originators from offering the best possible terms and conditions. Also, I believe the fear that the "unscrupulous broker" will take advantage is inaccurate. My feeling is that there have been many things already in place that have eliminated the "unscrupulous broker", and many of them are already out of the profession. As an experienced originator, I have seen many things be put in place that make originating very challenging, so I ask that this idea not be enforced so that we can continue to originate and provide the best options for our clients.