

From: Tracy L Castagna
Subject: Reg Z - Truth in Lending

Comments:

Date: Dec 04, 2009

Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages
Document ID: R-1366
Document Version: 1
Release Date: 07/23/2009
Name: Tracy L Castagna
Affiliation:
Category of Affiliation: Other
Address:
City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

I have been a mortgage broker for twelve years. My clients are told up front how I as a broker make my money and they are also told and notified again by the lender exactly what my compensation will be. YSP has allowed my clients to avoid paying closing costs and that has been a very helpful tool in allowing them to buy homes, refinance, etc. We as brokers are capped at a certain threshold for what we are allowed to make and again it is disclosed several times through the application process. We have had a very difficult climate these past two years, with less lenders, tighter underwriting and unfair publicity against brokers. I work on referrals only and I am able to price my loans at very competitive rates and closings costs. The new proposed flat fee compensation would put my company out of business. I have worked very hard to stay afloat these past two years, and this new regulation would not only be unfair, but would hurt the borrowers who will be left with less choice. We all benefit with more competition in any market and brokers not only offer very competitive rates, but exceptional service that absolutely is not found at your typical banks. My borrowers have never had a problem with the ysp I have made and disclosed to them. It comes down to rate and closing costs. The lowest rate and best service is a winning combination. Please do not allow this new proposal to take effect. This will not benefit the people in so many ways. Thank you for taking the time to read my thoughts. Sincerely, Tracy Castagna