

From: Providential Bancorp, Ltd., Rick Opper
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: Rick Opper
Affiliation: Providential Bancorp, Ltd.
Category of Affiliation: Commercial
Address:
City:
State:
Country: UNITED STATES
Zip:
PostalCode:

Comments:

Adoption of the proposed amendments to Reg Z would be a colossal mistake. Competition will be eliminated and the survivors will be free to raise pricing to levels heretofore unseen. The big banks must be salivating. They get exactly what they want under the guise of "consumer protection". If these amendments to Reg Z become law, it will be an unparalleled restraint of trade by an agency of the Federal government. To be fair, we would have to eliminate variable pricing on all goods and services sold in the US. No one will be compensated based on margins above "par". No one could charge more because they provide a higher level of customer service. etc. etc..... A "Flat Fee" representing profit would have to be applied to all sales. Absurd! I am all for consumer protection and support the measures requiring full disclosure. But, our obligation is to provide all the information necessary for the customer to make an informed decision. By fixing the price (sort of) we limit products and shortchange the customer by reducing his choices. In the name of "Consumer protection" we will have brought about a more costly lending environment which will be passed on to the people we are trying to protect.