

From: Hudson City Savings, Arthur Aranda  
Subject: Reg Z - Truth in Lending

---

Comments:

Date: Dec 06, 2009

Proposal: Regulation Z - Truth in Lending - Closed-end Mortgages  
Document ID: R-1366  
Document Version: 1  
Release Date: 07/23/2009  
Name: Arthur Aranda  
Affiliation: Hudson City Savings  
Category of Affiliation: Commercial  
Address:  
City:  
State:  
Country: UNITED STATES  
Zip:  
PostalCode:

Comments:

I am a Wholesale Account Executive and former mortgage broker for Hudson City Savings for the past 18 years. I think this bank has one of the best broker compensation programs in the industry. It's simple for the borrower to understand and easy for the broker to correctly follow. The bank's retail and wholesale rates and loan terms are the same however the bank pays a standard 1% of the loan amount to approved brokers when they originate a loan that the bank funds. The borrowers interest rate cannot be "bought up" for more compensation or the loan terms altered to their disadvantage so the broker can make more than the standard 1%. Furthermore the borrower does not get a "better deal" if they apply directly to the bank unless the broker charges additional fees which most do not. All brokers are carefully screened before they are approved and we require continual training of our brokers on our lending policy and procedures. Many of our brokers do most of their business with us. Eliminating this form of broker compensation would harm many borrowers who rely on the services of a mortgage broker to borrow money from the bank.