

From: Alex Venneri
Subject: Reg Z - Truth in Lending

Comments:

Date: Dec 08, 2009

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

Comments:

Dear Ben Bernanke, Eliminating YSP compensation is the wrong solution if you are trying to prevent loan officers from steering clients into high cost and/or high commission loans without regard to the clients' best interest. Question, "how are lender/investors able to incentivize" loan officers with high commission mortgages." The answer is the credit rating agencies! Fitch, Standard and Poor's, and Moody's have been given a pass on this whole financial mess. These credit rating agencies made a combined \$3,000,000,000 by rating JUNK mortgages as AAA. And, it was no secret in the secondary mortgage markets that this was standard practice for several years. Question, how were loan officers paid \$25,000 commissions on \$400,000 loans? AAA ratings on those products made it possible for investors to pay those YSP's. The free market has already corrected this problem and now it is up to you to make sure that it does not happen again. If you believe in free markets, then give clients a choice to choose a direct lender or a mortgage broker and decide between a no point, points, or a no cost loan. Do not limit the consumer choices by eliminating YSP, as this type of response will only exacerbate the problems within the mortgage industry as a whole. The free markets already have eliminated the subprime loan officers' YSP abuse in that area of the market. They are out of business! You are well intentioned and changes are required in the mortgage industry, but eliminating YSP is not the answer. Just maybe you should consider the credit rating agencies as the source of YSP abuse!

Sincerely,

Alex A. Venneri
Real Estate Mortgage Exchange