

From: Homestate Mortgage Company, Kathleen A. Broquet  
Subject: Reg Z - Truth in Lending - HELOCs

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Comments:

Dear Federal Reserve Board:

I have been in the mortgage industry since I was eighteen and have been involved in the many changes over the years. I understand that you are trying to protect the consumer against unfair lending practices. Since what has been termed the "mortgage meltdown" the unsavory lenders have all but disappeared. I have recently received training on the disclosure practices for the "Good Faith Estimate". A borrower is going to have a difficult time understanding two very important items: What is my payment and how much do I have to bring to closing? It is my understanding that we will have to provide an additional disclosure with those items.

In addition, the other concerns over the APR definition without a corresponding change in high cost loan calculations will trigger more high cost loans. Borrowers also want to close their home loan in the expected time frames not when additional waiting periods are required. As more and more restrictions are imposed only the most seasoned, experienced and concerned originators will be able to adjust to the new regulations, by imposing a salary restriction you are going to end up with unskilled and uneducated originators due to the time and monetary investment required, not to mention the liability exposure. I tell all of my customers you need to be working with an originator with at least ten years of experience and the commitment to quality loans. I am one of those originators.

Thank you, Kathleen.

Kathleen A. Broquet  
Sr. Loan Originator  
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